



Environmental Impact Statement

Smeaton Grange Waste Recycling and Transfer Facility
52 Anderson Road, Smeaton Grange

Prepared for Benedict Recycling Pty Ltd
June 2016

Environmental Impact Statement

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Smeaton Grange

Prepared for Benedict Recycling Pty Ltd | 17 June 2016

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Environmental Impact Statement

Final

Report J15135RP1 | Prepared for Benedict Recycling Pty Ltd | 17 June 2016

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Approved by **Philip Towler**

Position Associate Planner

Position Associate Director

Signature



Signature



Date 17 June 2016

Date 17 June 2016

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ENVIRONMENTAL IMPACT STATEMENT CERTIFICATION

For submission of an environmental impact statement (EIS) under Part 4 of the NSW *Environmental Planning and Assessment Act 1979*.

EIS prepared by

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Proponent

Benedict Industries Pty Limited

Proposed development

Development and operation of a waste recycling and transfer facility, Smeaton Grange.
Refer to to Chapter 2 of the EIS for a detailed description of the proposed development.

Land to be developed

52 Anderson Road, Smeaton Grange, Lot 319 DP 1117230

Certification

In relation to this EIS (25 May 2016) we certify that:

- it has been prepared in accordance with Schedule 2, Clauses 6 and 7 of the NSW Environmental Planning and Assessment Regulation 2000;
- it has been prepared with all available information that is relevant to the environmental assessment of the development to which this EIS relates; and
- the information contained in this EIS is nether false nor misleading.

A handwritten signature in blue ink, appearing to be 'P. Towler'.

Philip Towler
Associate Director

A handwritten signature in blue ink, appearing to be 'V. Blair'.

Verity Blair
Associate Planner

Executive Summary

Benedict Recycling Pty Ltd (Benedict Recycling) proposes to construct and operate a waste recycling and transfer facility (the facility) at 52 Anderson Road, Smeaton Grange (the site). The proposal will process up to 140,000 tonnes per annum of non-putrescible waste including building and demolition waste, selected commercial and industrial waste, soils, vegetation, virgin natural excavated material, excavated natural material, rail ballast and spoil.

The area surrounding the site is experiencing rapid residential and industrial growth, which is creating significant demand for mixed waste recycling services. There are currently no mixed waste recycling facilities in the region except for The Spring Farm Advanced Resource Recovery Park (ARRT), formerly the Macarthur Resource Recovery Park. The proposed Smeaton Grange facility will complement the activities of the Spring Farm ARRT by accepting waste from businesses and the general public and, allowing additional waste generated in the Narellan/Camden/Harrington Park area to be efficiently recycled, particularly as the ARRT does not recycle commercial and industrial waste or building and demolition waste.

The facility will import inert pre-classified general solid waste (non-putrescible), such as construction and demolition wastes, and selected commercial and industrial wastes, for processing (screening and sorting) to produce saleable recycled materials.

All of the materials brought onto the site will be taken from the site as products, recyclable residues needing further processing or as non-recyclable residues for disposal at a licensed landfill. There will be no materials land-filled or otherwise disposed anywhere within the site as a result of the proposal.

The site, is zoned IN1 General Industrial under the Camden Local Environmental Plan 2012 and the proposal is permissible with consent.

The site is ideally suited for the development of a waste recycling and transfer facility because it is: in an industrial area centrally located in Narellan area; readily accessible to light and heavy vehicles; and there are existing utilities and stormwater connections. Development of the proposal will provide an ongoing economic and social benefit from the site.

This environmental impact statement has been prepared in accordance with the Secretary's environmental assessment requirements Clauses 71 and 72 of the Environmental Planning and Assessment Regulation 2000 and advice provided by Camden Council following a pre-development application meeting. It describes the existing environment, the proposal, the legislative and policy context, proposed environmental management measures and the impacts of the proposal. Given the location and condition of the site, the proposed activities will only have minor environmental impacts.

The proposal is considered to be in the public's interest for the following reasons:

- the proposal provides an environmentally beneficial means of dealing with non-putrescible general solid waste by recycling up to 90% of the materials processed at the site, that would otherwise go to lower order uses such as landfill;
- the proposal provides recycled products for use in the construction industry, amongst others, and thereby helps reduce the amount of 'new' products required;
- the proposal provides a suitable use for an vacant industrial site;

- the proposal will provide socio-economic benefits through employment and stronger regional industrial activity; and
- the proposal's environmental and social amenity impacts are negligible with the implementation of the recommended mitigation and management measures.

It is, therefore, recommended that the proposed waste recycling and transfer facility is approved subject to the mitigation measures outlined in this EIS.

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1 Introduction

1.1 Proposal overview

Benedict Recycling Pty Ltd (Benedict Recycling) proposes to construct and operate a waste recycling and transfer facility (the facility) at 52 Anderson Road, Smeaton Grange (the site) that will¹ process up to 140,000 tonnes per annum (tpa) of pre-classified general solid (non-putrescible) waste including building and demolition waste, selected commercial and industrial waste, soils, vegetation, virgin natural excavated material, excavated natural material, rail ballast and spoil. The waste will be processed (screened and sorted) to produce saleable recycled materials.

Ready-to-use recycled products will include soils and a range of recyclable materials. Segregated recycled materials that will be transported to other Benedict recycling sites or sold to other recycling firms for further processing will include ferrous and non-ferrous metals, dry paper/cardboard, masonry (concrete, bricks, tiles, asphalt, gyprock etc) and plastics. All of these products will meet recycled feedstock specifications while recovering a range of materials that would otherwise be disposed to landfill. It is not proposed to compost, crush or shred any waste onsite.

Only 'pre-classified general solid waste (non-putrescible) waste' as defined by the *Waste Classification Guidelines - Part 1: Classification of Waste* (Environment Protection Authority (EPA) 2014a) will be accepted by the site. No special, liquid, hazardous, restricted solid waste or general solid waste (putrescible), as defined in EPA (2014a), will be accepted at the facility.

All of the materials brought onto the site will be taken from the site as products, as recyclable residues to a waste recycling and transfer facility or as non-recyclable residues for disposal at an EPA licensed landfill. There will be no materials land-filled or otherwise disposed of anywhere within the site as a result of the proposal.

The waste recycling and transfer facility will service the wider Narellan region and surrounding area, which is characterised by rapid residential and industrial growth which generates significant demand for waste disposal. The proposal provides an environmentally beneficial means of dealing with non-putrescible general solid waste by recycling 90% of the materials processed at the site.

¹ The project is a development proposal and its implementation is conditional on receiving relevant approvals. For reason of style however, the project and related proposed activities have been described in the active mood 'will' rather than 'would'.

1.2 The applicant

The applicant is Benedict Recycling which is part of Benedict Industries Pty Ltd, a New South Wales (NSW)-based group of companies with quarrying, resources and recycling businesses. Established in 1966, it is one of the largest producers of quarried materials in NSW and continues to be family owned and managed. The group supplies a range of sands, soils, sandstone, decorative aggregates and recycled products to customers in the greater Sydney Region and across NSW. It owns operations in Menai, Newcastle, Chipping Norton, Moorebank, Menangle, Belrose, Mittagong, Appin and Cowra. Major customers include Roads and Maritime Services (RMS), Sydney Water, Holcim, Boral Concrete, Concrete, Fulton Hogan, Hanson and most major construction and infrastructure companies as well as numerous local councils.

Benedict Recycling currently operates recycling facilities at Chipping Norton and Belrose, with operations in Newcastle and Canberra opening shortly.

1.3 Site description

1.3.1 Location and characteristics

The site is located at 52 Anderson Road, Smeaton Grange and is legally described as Lot 319 in DP 1117230. It is in the Smeaton Grange industrial estate and covers approximately 6,862 square metres (m²) (refer to Figure 1.1). The site is flat, approximately 88 m Australian Height Datum (mAHD), and devoid of vegetation other than grass (Photograph 1.1).

The site is situated on former agricultural land that has been rezoned, subdivided and is in the process of being developed for industrial purposes. Benedict Recycling has entered into a joint venture (JV) with the land owner to purchase the site to develop the waste recycling and transfer facility so it has secure tenure to meet Narellan's and the surrounding area's needs for many years to come.

1.3.2 History

The site was previously used for agricultural purposes and has recently been rezoned and redeveloped by Investa Property Group for industrial purposes.

1.3.3 Surrounding environment

The site is located at the southern most end of Anderson Road at the end of a cul-de-sac. Land immediately to the south-west is developed with a large transport depot operated by Coles Logistics (Coles). It is noted that all vehicle traffic associated with this development uses the access points on Hartley Road to the south and the Coles site has no direct traffic connection to Anderson Road. A colourbond fence, about 2 m high, runs along the southern boundary of the Coles site at the top of an embankment.

Land to the west of the site is currently under construction for industrial purposes, including Axis Constructions on land immediately to the west, while land further to the west on Lone Pine Place is now completely developed with industrial buildings.

The north-east boundary of the site abuts a vegetated creek corridor (Kenny Creek), with vegetation generally identified as re-vegetated dry sclerophyll forest (shrub understorey) (Photograph 1.4). Land on the northern side of the corridor is currently under development for industrial purposes, including Endeavour Energy and a number of large scale industrial developments.

There is an easement running north-east to south-west approximately 100 m east of the site, separating industrial land within Smeaton Grange from residential land at Currans Hill. Immediately to the south-east of the site is an area of vacant land, some 7,760m² in area, which forms part of the adjoining Coles lot. Land immediately to the south of the site is elevated some two to three metres higher than the site and is sparsely vegetated.



Site location plan

Smeaton Grange waste transfer station
Environmental Impact Statement

Figure I.1



Photograph 1.1 View across the site from Anderson Road



Photograph 1.2 View north-west across site from embankment to the rear of the southern boundary



Photograph 1.3 View south-west to rear of adjacent Coles site



Photograph 1.4 **View along eastern site boundary to vegetated corridor beyond**



Photograph 1.5 **View to southwest of site and Coles depot beyond**

1.4 Project justification and alternatives

1.4.1 Project justification

Recycling in Australia results in a wide variety of tangible and measurable environmental benefits compared with landfill disposal. These include energy savings, avoidance of greenhouse gas emissions, water savings, avoidance of waste, and significant reductions in natural resource use, eutrophication² and airborne pollutants. The environmental benefits are most apparent in the two significant stages of the waste process which are avoided: extraction of raw materials and disposal of waste to landfill.

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 increasing 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.”

As an established recycling business in NSW, Benedict Recycling supports these strategies and their ongoing implementation. The waste recycling and transfer facility will contribute to meeting the NSW Government’s recycling strategies and targets.

The area surrounding the site is one of Sydney’s fastest developing residential areas (.id 2011) and the Smeaton Grange Industrial Estate has experienced rapid, large scale industrial development, particularly in the last five years. This development in the vicinity of the site has created a significant demand for mixed waste recycling facilities.

There are currently no mixed waste recycling facilities in the region except for the Spring Farm Advanced Resource Recovery Park (ARRT), formerly the Macarthur Resource Recovery Park and originally Jacks Gully Waste and Recycling Centre. The proposed Smeaton Grange facility will complement the activities of the Spring Farm ARRT, by accepting waste from businesses and the general public and, allowing additional waste generated in the Narellan/Camden/Harrington Park area to be efficiently recycled.

The proposal has many benefits from an economic, social and environment perspective. Specifically the waste recycling and transfer facility will:

- divert recyclable and reusable wastes from landfill, including co-mingled waste for which there are few recycling alternatives in the area;
- divert wastes from landfill to preserve space for less recyclable materials, thereby extending the life of landfills;
- produce ready-to-use recycled soil materials to assist construction firms and government agencies (including councils) to meet their environmental commitments to use recycled materials;
- produce segregated recycled materials (eg ferrous and non-ferrous metals, gyprock, timber and plastics) for further processing;
- produce ‘crusher ready’ materials for recyclers of masonry (bricks, concrete, tiles, asphalt);

² ‘eutrophication’ is the the artificial, often detrimental, enrichment of an aquatic system by the addition of nutrients of waterways.

- provide storage for vehicles and bins owned by small to medium sized waste contractors away from residential areas and with appropriate environmental controls such as surface water runoff controls;
- provide a commercial return, thereby contributing to the economy of NSW; and
- provide employment for eight people within the waste recycling and transfer facility and potentially further employment associated with ancillary waste activities.

The *NSW Waste Avoidance and Resource Recovery Strategy 2014–21* (EPA 2014b) provides a framework for actions to minimise environmental harm from waste generation through to disposal, as well as maximising efficient resource use. The strategy sets targets for preventing waste generation, increasing the recovery and use of secondary resources, reducing toxic substances in products and materials, and reducing litter and illegal dumping. The strategy aims to increase the recovery and use of materials from the construction and demolition sector. The waste recycling and transfer facility will assist to achieve this aim through recycling construction and demolition waste.

1.4.2 Site location

Benedict Recycling entered into a joint venture (JV) agreement with the landowner to purchase the site at Smeaton Grange for the sole purpose of developing a waste recycling and transfer facility. The site is ideally suited for the development of such a facility because:

- it is centrally located in within the Narellan area;
- the region is experiencing rapid residential and industrial growth and the site is well located to meet the resulting demand for waste recycling;
- Anderson Road is not a designated main road or ‘spine’ road, it is readily accessible from roads suitable for heavy vehicle use; and
- there are existing utilities and stormwater connections.

1.4.3 Consideration of alternatives

i Do nothing

The site is currently undeveloped. If it is not developed with a waste recycling and transfer facility, it will be developed for some alternative industrial purpose. Under this scenario, waste will need to be processed at Spring Farm ARRT or another waste facility.

ii Alternative land use

The land is zoned industrial, thereby preventing residential and/or commercial development. The proposed waste recycling and transfer facility is classed as industrial use and is therefore a suitable use for the site.

1.5 Purpose of report

This EIS accompanies a development application (DA) for the proposal under Part 4 of the *NSW Environmental Planning and Assessment Act 1979* (EP&A Act). The consent authority for the DA is the Minister for Planning and the determining authority is anticipated to be the Planning Assessment Commission (PAC).

This EIS has been prepared in accordance with the EP&A Act and Environmental Planning and Assessment Regulation 2000 (EP&A Regulation), and addresses the requirements of the relevant government agencies as described in the SEARs and matters raised during consultation with Camden Council (CC), agencies and surrounding neighbours that are likely to be impacted by the proposal.

A development application (DA) was lodged with Camden Council for site establishment works with the intention that site establishment works could be commenced while approval for the waste recycling and transfer facility was being sought.

In order to streamline the approvals process and mitigate inconsistencies that may arise from having multiple consents, Benedict has now withdrawn the site establishment DA with CC and seeks consent for both the construction and use of the waste transfer and recycling facility through this state significant development (SSD) application (SSDA).

1.6 Camden Council requirements

The CC letter (dated 9 December 2015) regarding the pre-lodgement meeting held on 7 December 2015 lists issues to be addressed in the assessment of the proposal. A copy of the letter is provided in Appendix A. At this stage, it had not been determined that the proposal would be an SSD. These requirements, and where they are addressed in this EIS, are summarised in Table 1.1. It is noted that development control plans do not apply to SSD (refer to Section 3.3) and therefore the Camden Development Control Plan (DCP) 2011 has not been specifically considered.

Table 1.1 Camden Council requirements

Assessment requirement	Reference in EIS
- Relevant EPI's and DCP's including: - SEPP (State and regional development) 2011; - SEPP 33 Hazardous and Offensive Development; - SEPP (Infrastructure) 2007; - SEPP 55 Remediation of Land; - SEPP 20 Hawkesbury-Nepean River; - Camden LEP 2010; and - Camden DCP 2011. - Designated development – the proposal constitutes designated development, requires SEARs from Department of Planning and Environment (DPE) for the EIS.	- Section 3.3.2 - Section 3.3.2 - Section 3.3.2 - Section 3.3.2 - Section 3.3.2 - Section 3.3.2 - Section 1.6 - Section 3.2.2
Nominated integrated development – within 40m of a watercourse, Controlled Activity Approval required.	Section 3.2.3
Integrated development – referral to NSW EP&A required.	Section 3.2.3

Table 1.1 Camden Council requirements

Assessment requirement	Reference in EIS
- DCP including: - setback must be 10 m of which 5 m must be utilised for landscaping - D4.5.2 of the Camden DCP 2011; - building height maximum height is 11 m; - fencing to form important security role and compliment development; - maximum fence height 2.1 metres; and - location of future signage and identification of signage zones.	N/A
Acoustic assessment in accordance with Council's Environmental Noise Policy.	N/A
Bushfire report by qualified bushfire consultant demonstrating consideration and management of bushfire in accordance with NSW RFS ' <i>Planning for Bushfire Protection</i> ' 2006, requirement for an Asset Protection Zone.	Section 6.4 and Appendix F
Air quality – assessment of air quality and odour impacts.	Section 6.8 and Appendix I.
Traffic report – addressing traffic impacts, frequency and types of vehicles, impacts on intersection queuing lengths and times.	Section 6.2 and Appendix E
Swept paths for the largest vehicle for service entry.	Section 6.1 and Appendix D
Drainage/water quality – stormwater management plan in accordance with Council's engineering specifications.	Site establishment DA
A construction and operational waste management plan addressing waste types, generation rates, storage and collection and disposal.	Section 6.5.3 and Appendix G
	N/A

1.7 Secretary's environmental assessment requirements

This EIS accompanies an SSDA for designated development as defined in Schedule 3 of the EP&A Regulation. The EIS has been prepared to address specific requirements provided by the DPE and other relevant agencies. These Secretary's Environmental Assessment Requirements (SEARs) were issued on 16 December 2015 (reference SSD 7424) and are provided in Appendix B. As required under Section 78A of the EP&A Act, this EIS has been prepared in accordance with the SEARs. The SEARs and where they are addressed in this EIS are summarised in Table 1.2.

Table 1.2 Secretary's environmental assessment requirements

Assessment requirements	Reference in EIS
Strategic context:	
a detailed description of the development;	Chapter 2
a demonstration that the proposal is consistent with all relevant planning strategies, environmental planning instruments, DCPs, or justification for any inconsistencies;	Chapter 3 and throughout the EIS
a list of any approvals that must be obtained under any other Act or law before the development may lawfully be carried out;	Section 3.2.3
a consolidated summary of all the proposed environmental management and monitoring measures, highlighting commitments; and	Table 7.1
A capital investment value report from a quantity surveyor.	Appendix J

Table 1.2 Secretary's environmental assessment requirements

Assessment requirements	Reference in EIS
Waste management:	
• details of the type, quantity and classification of waste to be received at the site;	Section 2.3
• details of the resource outputs and any additional processes for residual waste;	Sections 2.4 and 2.5
• details of waste handling including, transport, identification, receipt,	Sections 2.4 and 2.5
• stockpiling and quality control; and	Section 2.3.4
• the measures that would be implemented to ensure that the proposed development is consistent with the aims, objectives and guidelines in the NSW Waste Avoidance and Resource Recovery Strategy 2014-2021.	Section 1.4.1 and Chapter 2
Traffic and transport	
• details of road transport routes and access to the site;	Section 6.1 and Appendix D
• road traffic predictions for the development during construction and operation; and	Section 6.1.2 and Appendix D
• an assessment of impacts to the safety and function of the road network; and the details of any road upgrades required for the development.	Section 6.1.2 and Appendix D
Air quality and odour	
• an air quality impact assessment in accordance with EPA Guidelines;	Sections 6.2.1 and 6.2.2 and Appendix E
• details of buildings and air handling systems, justification for any material handling, processing or stockpiling external to a building;	Chapter 2 and Appendix E
• greenhouse gas assessment; and	Section 6.3 and Appendix E
• a description and appraisal of air quality impact mitigation and monitoring measures.	Sections 6.2.1 and 6.2.2 and Appendix E
Noise and vibration	
• a description of all potential noise and vibration sources during construction and operation, including road traffic noise;	Section 6.4.1 and Appendix F
• a noise and vibration assessment in accordance with the relevant Environment Protection Authority Guidelines; and	Sections 6.4.1 and 6.4.3 and Appendix F
• a description and appraisal of noise and vibration mitigation and monitoring measures.	Section 6.4.2, Table 7.1 and Appendix F
Soil and water	
• a description of local soils, topography, drainage and landscapes;	Sections 1.3 and 3.3.2 and Appendix H
• the details of stormwater and wastewater management;	Section
• the details of sediment and erosion controls;	Appendix H
• the details of water usage including water supply and licences;	Appendix H
• an assessment of impacts to surface and groundwater resources, flooding impacts, and impacts to groundwater dependant ecosystems; and	Sections 6.5.3 and 6.5.4 and Appendix H
• a description and appraisal of impact mitigation and monitoring measures.	Section 6.6 and Appendix H

Table 1.2 Secretary's environmental assessment requirements

Assessment requirements	Reference in EIS
Hazards and risk	
the Environmental Impact Statement must include a preliminary risk screening completed in accordance with <i>State Environmental Planning Policy No. 33 - Hazardous and Offensive Development</i> and Applying SEPP 33 (Department of Planning (DoP) 2011a), with a clear indication of class, quantity and location of all dangerous goods and hazardous materials associated with the development. Should preliminary screening indicate that the project is "potentially hazardous" a Preliminary Hazard Analysis (PHA) must be prepared in accordance with Hazardous Industry Planning Advisory Paper No.6 - Guidelines for Hazard Analysis (DoP 2011b) and Multi-Level Risk Assessment (DP&I 2011).	Chapter 5
Visual	
an assessment of the potential visual impacts of the project on the amenity of the surrounding area	Section 6.9

2 Project description

2.1 General

Benedict Recycling proposes to construct and develop a waste recycling and transfer facility on the site and undertake ancillary activities. The proposal will have two main components:

- waste recycling and transfer; and
- ancillary activities including temporary storage of commercial vehicles, bins and containers.

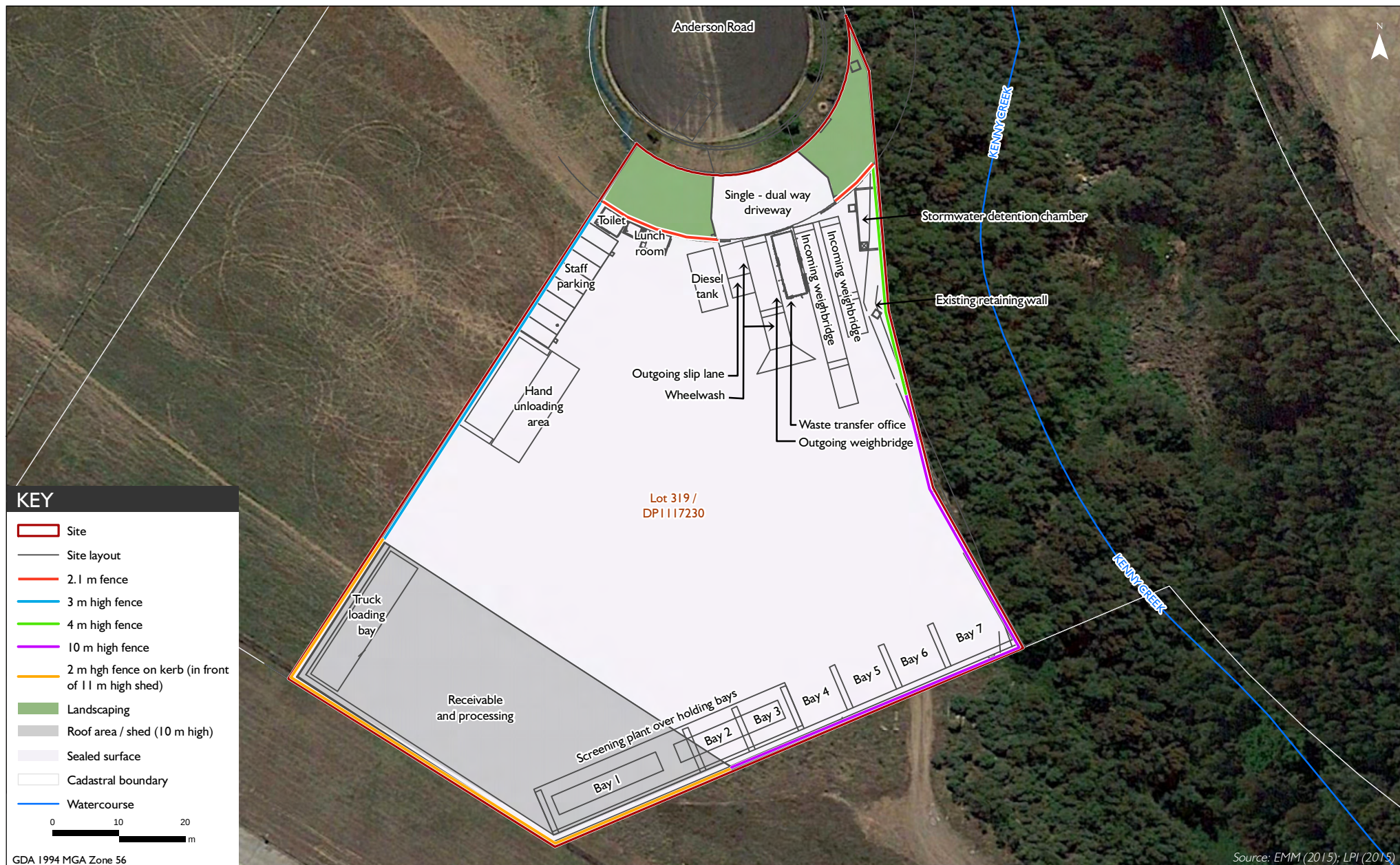
This chapter describes the proposed waste recycling and transfer facility and the activities that are proposed. It also introduces site-wide environmental controls. A plan showing the intended site layout is provided in Figure 2.1 while full plans for the project are provided in Appendix C. A flowchart outlining the key steps in the proposed waste recycling and transfer process are provided in Figure 2.2.

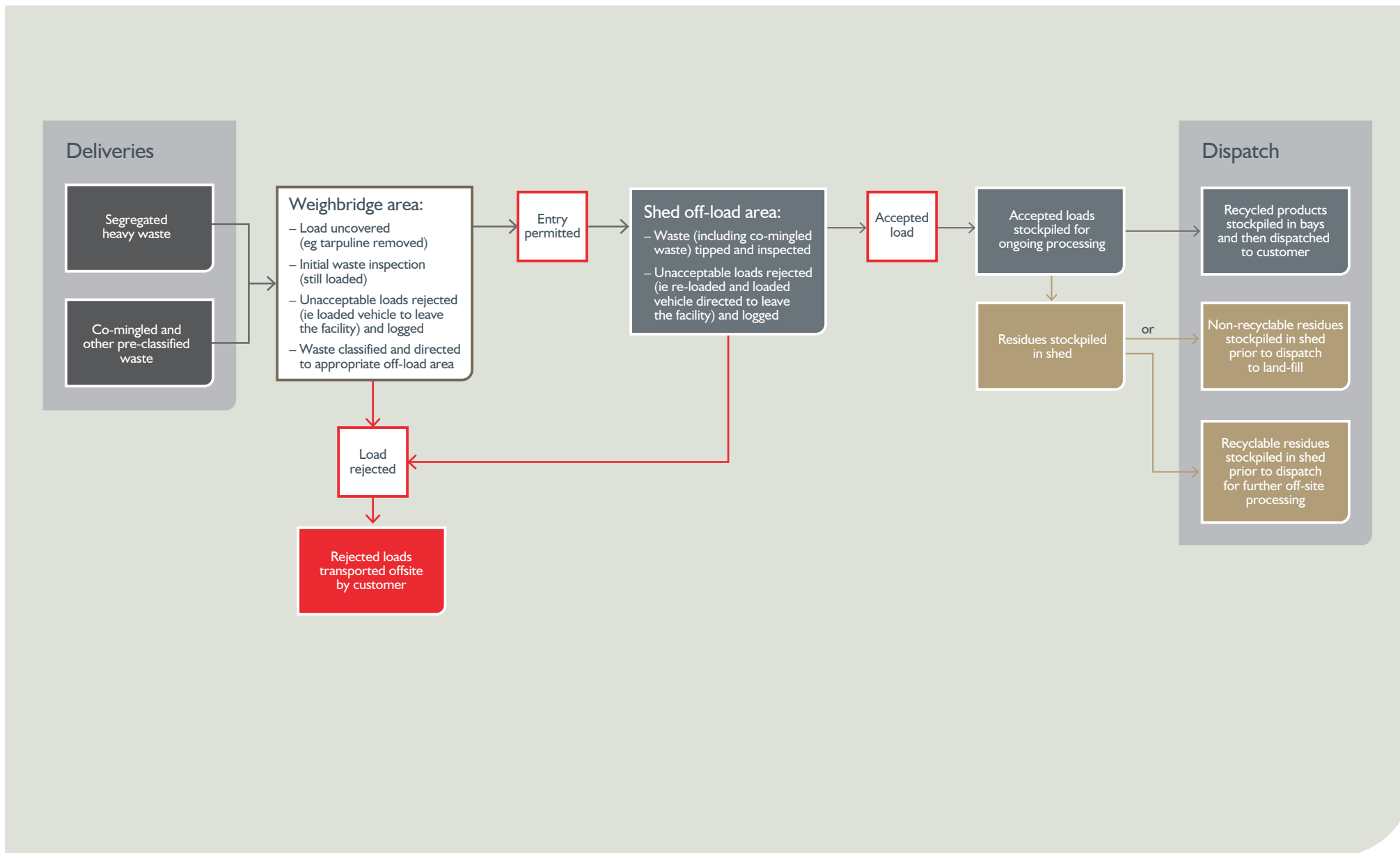
2.2 Site components

This SSDA seeks consent for the following components:

- a shed, constructed in colourbond, between approximately 45.67 m and 61.96 m in length, 24 m in width and 11 m high with a floor area of approximately 1,300 m²;
- a concrete slab for the shed;
- hard surfacing of the site in a material such as concrete or asphalt, with a perimeter curb;
- a surface water management system;
- landscaping;
- eight on-site parking spaces for staff, including one disabled space;
- connection to services;
- a weighbridge area with weighbridges;
- wheel washes for outbound vehicles;
- a demountable office;
- demountable amenities including lunch room and toilets;
- seven product bays, which will be four metres high and blockwalled;
- an enclosed, above ground bunded diesel storage tank (approximately 30,000 L);
- establishment of hand unloading area (to replace 'waste storage area' under site establishment DA);
- a sprinkling site irrigation system to minimise airborne dust;

- a flip-flow screen waste sorter (housed in main shed);
- an enclosed picking line inside the main shed that extends outside along a portion of the southern boundary;
- boundary fencing to a maximum height of 10 m on the south-eastern boundaries, 4 m along a portion of the eastern boundary, 3 m on the western boundary and 2 m at the rear and sides of the shed (see Figure 2.1);
- 2.1 m high metal palisade fence with automatic colourbond gates at the ingress and egress point;
- waste/product stockpiles; and
- out-of-hours bin storage and waste truck parking.





2.2.1 Weighbridge and office area

i Site establishment

The weighbridge and office area in the north of the site will contain weighbridges, wheel washes, the site office in addition to an automatic gate for ingress and egress, and amenities and on-site parking as approved as part of the site establishment DA.

ii Recycling and waste transfer facility

Initially, two above-ground weighbridges will be used for incoming and outgoing vehicles. It is anticipated that a third above-ground weighbridge will be installed as demand requires, to improve servicing of incoming vehicles.

An above-ground self-contained wheel wash will be provided in front of the weighbridge for trucks leaving the site in addition to an additional wheelwash should the second outbound weighbridge/exit become utilised. Water used in the wheel wash will be lost through evaporation, and on tires leaving the wash, so periodic replenishment will be required. Sediment in the wheel wash will be regularly removed using an excavator.

2.2.2 Main processing shed

The majority of waste storage, processing and product storage will occur within the main processing shed, to be constructed as part of the site establishment works. The shed will be built in colourbond steel, in 'windspray' colour (refer to Figure 4.1), and enclosed on three sides (along the north-west, south-west and southern boundaries). The side facing the interior of the site will be open.

The main processing shed forms part of the site establishment DA.

The shed will be approximately between 45.67 m and 61.96 m long and 24 m wide. It will have a maximum wall height of 10 m, a maximum roof height of 11 m, and a floor area of around 1,300 m². The floor of the shed will be level concrete with an internal block wall, around 4 m in height, following the length of the three external walls (as per the site establishment DA).

The main processing shed will contain:

- a concreted tipoff/inspection area;
- a flip-flow screen waste sorter (eg Finlay 883 flip flow screen or similar);
- an enclosed picking line with product bays, which will be 4 metres high and block walled; and
- waste/product stockpiles.

Processing within the shed is described in Section 2.4.

Diesel for plant and equipment used on the site will be stored in an external above-ground tank (approximately 30,000 L) located in accordance with the relevant Australian Standard/s. The tank will be within a bund with a capacity of 10% more than the tank's capacity. The tank and bund will be covered by a roof to prevent rain falling into the bund. The tank will be enclosed by colourbond (or similar) walls to prevent leaks in the site of the tank spraying outside of the bund.

Plant and vehicle diesel tanks will be filled from a bowser located next to the diesel tank. The filling area will also be bunded so that any fuel spilled during plant refuelling will be captured and will drain to an interceptor trap. There will be a diesel spill kit stored next to the bowser. This will be used in the case of a spill. Used absorbent material will be disposed at an appropriately licensed waste facility. Further details regarding the management of diesel on the site are provided in Table 7.1.

2.2.3 Site access

Sealed access and egress points, with dual entry and exit lanes located within a single crossover, will be created at the site's frontage on Anderson Road, as part of the site establishment works. This will not require modification to Anderson Road.

2.2.4 Site surfacing

The site's surface will be sealed, apart from the landscaped area at the front. All vehicle movement inside the site, as well as access and egress, will be strictly controlled. A surface water management system to mitigate the release of untreated stormwater runoff will be installed, with the site's surface graded towards the sediment control pit located in the north-east corner.

2.2.5 Car parking

Eight car parking spaces, including one designated space for persons with a disability, will be provided within the site, in the north-west corner. Car parking spaces will be dimensioned in accordance with the relevant standards.

It is noted that given the industrial nature and generous width of Anderson Road, there are generally no kerbside parking restrictions which apply in the vicinity of the site, including along the site frontage. A traffic management plan and vehicle turning certification are provided the TIA (refer to Appendix B).

2.2.6 Traffic

The site has been designed with separate access and egress points in order for all traffic to enter and exit the site in a forwards direction. Apart from the shed columns, waste store and two demountable buildings, traffic movement around the site will be largely unrestricted.

2.2.7 Landscaping

The verge between the site and Anderson Street will remain turfed and the existing street trees retained, with the exception of one small tree located within the proposed site access. The site's frontage will be landscaped to a high standard in accordance with landscape plans prepared by Greenland Design. Landscaping will comprise native species, with water gums set behind a garden bed wrapping around the site's frontage. Groundcover and shrubs will be planted around the visitor car parking spaces.

It is noted that landscaping for that part of the site identified as bushfire prone land will be in accordance with the *Planning for Bushfire Protection Guidelines* (Rural Fire Service (RFS) 2006).

2.2.8 Site security

i Site establishment

Site establishment works will include landscaping of the site's frontage and installation of 2.1 m high metal palisade fence with automatic gates, also 2.1 m high.

ii Recycling and waste transfer facility

This SSDA seeks to increase the 3 m high colourbond perimeter fence along the southern boundary (extending approximately half way along the south-east boundary) to a height of 10 m, except where the shed walls abut the boundary. In these locations the existing 2 m high chain mesh fencing will be retained.

iii Signage

Signage will include a sign at the entrance to the site on Anderson Road with the name of the facility, opening hours and a telephone number for a phone that will be attended whenever the site is accepting waste or operating.

2.3 Waste materials, sources and quantities

2.3.1 Waste materials accepted

The waste recycling and transfer facility will accept 'Pre-classified general solid waste (non-putrescible)' as defined by EPA (2014a) (see Section 2.3.2). This will mainly consist of the following wastes:

- co-mingled and segregated construction and demolition waste, including tiles, bricks, concrete, glass, metal, wood, asphalt, gyprock and vegetation and uncontaminated soils;
- co-mingled and segregated commercial and industrial waste from factories and commercial premises such as paper/cardboard, cloth, plastics, rubber, wood, suitable slags, concrete and asphalt batching wastes and the like;
- excavated natural materials (ENMs) including virgin natural excavated material (VENM) such as sand and sandstone which are generated during bulk earthworks and road and infrastructure construction and repair;
- garden waste;
- wood waste;
- metals; and
- rail ballast and spoils.

No special hazardous restricted solid waste (including asbestos) will be accepted at the site.

2.3.2 Waste classification

Wastes accepted by the site will be classified according to the *Waste Classification Guidelines - Part 1: Classification of Waste* (EPA 2014a).

The following wastes will not be accepted:

- special waste (including clinical and related waste; asbestos waste; whole loads of waste tyres; or anything classified as special waste under an EPA gazettal notice) as defined in EPA (2014a) Step 1;
- liquid waste as defined in EPA (2014a) Step 2;
- wastes pre-classified as hazardous waste as defined in EPA (2014a) Step 3;
- general solid waste (putrescible) as defined in EPA (2014a) Step 3;
- waste possessing hazards as defined in EPA (2014a) Step 4; or
- waste that requires chemical assessment to determine its classification as defined in EPA (2014a) Step 5.

Waste that is pre-classified as General solid waste (non-putrescible) as listed in Table 2.1 will be accepted by the site.

Table 2.1 Pre-classified 'General solid waste (non-putrescible)' as defined by EPA (2014a)

The following wastes (other than special waste, liquid waste, hazardous waste, restricted solid waste or general solid waste (putrescible)) are pre-classified as 'general solid waste (non-putrescible)':

- glass, plastic, rubber, plasterboard, ceramics, bricks, concrete or metal;
- paper or cardboard;
- household waste from municipal clean-up that does not contain food waste;
- waste collected by, or on behalf of, local councils from street sweepings;
- grit, sediment, litter and gross pollutants collected in, and removed from, stormwater treatment devices and/or stormwater management systems, that has been dewatered so that they do not contain free liquids;
- grit and screenings from potable water and water reticulation plants that has been dewatered so that it does not contain free liquids;
- garden waste;
- wood waste;
- waste contaminated with lead (including lead paint waste) from residential premises or educational or child care institutions;
- containers, previously containing dangerous goods, from which residues have been removed by washing [The cleaning method must be as good as or better than the triple-rinsing method outlined in Appendix 2 of EPA (2014b)] or vacuuming;
- drained oil filters (mechanically crushed), rags and oil-absorbent materials that only contain non-volatile petroleum hydrocarbons and do not contain free liquids;
- drained motor oil containers that do not contain free liquids;
- non-putrescible vegetative waste from agriculture, silviculture or horticulture;
- building cavity dust waste removed from residential premises or educational or child care institutions, being waste that is packaged securely to prevent dust emissions and direct contact;
- synthetic fibre waste (from materials such as fibreglass, polyesters and other plastics) being waste that is packaged securely to prevent dust emissions, but excluding asbestos waste;
- virgin excavated natural material;
- building and demolition waste;
- asphalt waste (including asphalt resulting from road construction and waterproofing works);
- cured and uncured concrete waste from a batch plant;

Table 2.1 Pre-classified 'General solid waste (non-putrescible)' as defined by EPA (2014a)

- fully cured and set thermosetting polymers and fibre-reinforcing resins;
- fully cured and dried residues of resins, glues, paints, coatings and inks; and
- any mixture of the wastes referred to above.

In assessing whether waste has been pre-classified as general solid waste (non-putrescible), the following definitions apply:

Building and demolition waste means unsegregated material (other than material containing asbestos waste or liquid waste) that results from:

- the demolition, erection, construction, refurbishment or alteration of buildings other than:
 - o chemical works;
 - o mineral processing works;
 - o container reconditioning works; and
 - o waste treatment facilities.
- the construction, replacement, repair or alteration of infrastructure development such as roads, tunnels, sewage, water, electricity, telecommunications and airports;

and includes materials such as:

- bricks, concrete, paper, plastics, glass and metal; and
- timber, including unsegregated timber, that may contain timber treated with chemicals such as copper chrome arsenate (CCA), high temperature creosote (HTC), pigmented emulsified creosote (PEC) and light organic solvent preservative (LOSP).

but does not include excavated soil (for example, soil excavated to level off a site prior to construction or to enable foundations to be laid or infrastructure to be constructed).

Garden waste means waste that consists of branches, grass, leaves, plants, loppings, tree trunks, tree stumps and similar materials, and includes any mixture of those materials.

Virgin excavated natural material means natural material (such as clay, gravel, sand, soil or rock fines):

- that has been excavated or quarried from areas that are not contaminated with manufactured chemicals, or with process residues, as a result of industrial, commercial, mining or agricultural activities; and
- that does not contain sulfidic ores or soils, or any other waste.

and includes excavated natural material that meets such criteria for virgin excavated natural material as may be approved from time to time by a notice published in the NSW Government Gazette.

Municipal waste consisting of household domestic recycling that is set aside for kerbside collection or delivered by the householder to the waste facility (eg glass, plastic, cardboard, paper, aluminium and steel).

Wood waste means sawdust, timber offcuts, wooden crates, wooden packaging, wooden pallets, wood shavings and similar materials, and includes any mixture of those materials, but does not include wood treated with chemicals such as CCA, HTC, PEC and LOSP.

2.3.3 Waste deliveries

The site will accept inert waste from councils, contractors and businesses and the general public. Accordingly, waste will be delivered to site by a variety of vehicles including:

- light vehicles such as cars with box trailers and utilities;
- single or dual axle heavy vehicles such as 'Daihatsus' and skip-bin trucks; and
- multiple axle combination heavy vehicles.

Vehicles will access the site from Anderson Road via Anzac Avenue, Narellan Road and Camden Valley Way. Narellan Road, Camden Valley Way and Anzac Avenue are major heavy vehicle routes. Anderson Road and Anzac Avenue are located wholly within the Smeaton Grange industrial area and are suitable for heavy vehicles. The vehicle movements associated with the proposed operations are described in Section 6.1 and Appendix D.

All vehicles delivering waste will be directed to the weighbridge where the load will be inspected for potential contaminants and classified. A ticket will be issued and the driver will be instructed where to deliver the waste within the site. The driver will then deliver the waste to the appropriate area where it will be tipped and will be closely inspected prior to the vehicle being directed back to the weighbridge area. Light vehicles will proceed to the designated 'hand unloading area' (refer to Appendix C) so that they can be safely unloaded by hand in a location that is away from trucks, heavy machinery etc. Vehicles will be re-weighed as they leave the site to determine the mass of the load delivered. Any rejected loads will be immediately reloaded for removal from the site and recorded in a 'rejected load' register.

All incoming waste will be inspected according to the incoming waste quality management plan (see Section 2.3.4) prior to being accepted.

2.3.4 Incoming waste quality plan

General waste (non-putrescible) can contain materials (eg hazardous materials, including asbestos) that are not pre-classified general solid waste (non-putrescible) as defined by EPA (2014a) (see Table 2.1). An incoming waste quality plan will be prepared in accordance with the NSW WorkCover *Management of Asbestos in Recycled Construction and Demolition Waste Guide* (NSW WorkCover 2010).

Incoming waste will be inspected in two stages:

1. a preliminary inspection of the incoming waste on the vehicle at the weighbridge; and
2. an inspection of the incoming waste after it is tipped off but before it is added to the appropriate feed stockpile. The customer will be required to wait until the waste has passed the inspection.

Any incoming waste loads that are suspected to contain contaminants (ie loads that contain wastes that are not listed in Table 2.1) will be rejected and the customer will be required to take the contaminated load out of the waste recycling and transfer facility immediately.

The plan will include:

- Prevention actions such as:
 - a 'no asbestos' clause in supplier contracts, advising suppliers that asbestos containing materials will not be accepted;
 - installing warning signage;
 - training workers on waste inspection and asbestos awareness and management; and
 - education programs at material source locations to minimise the risk of asbestos containing materials such as fibro entering the supply chain and being imported onto the premises.
- Contingency actions if potential asbestos containing materials are identified, including a rejected load register and reporting to the EPA.

- Empowering waste inspectors to reject loads considered 'suspect' or odorous.

Products produced for direct sale will be tested in accordance with requirements of the relevant resource recovery exemption.

2.4 Waste processing

Waste recycling and transfer facility processing will include the following steps:

- 1) Waste will be inspected prior to being accepted on site and any loads suspected to contain material that cannot be accepted by the site will be rejected (see Section 2.3.4).
- 2) Wastes will generally be stored undercover in the main processing shed prior to processing. However, some segregated heavy materials (eg separated concrete, screen soils, VENM, ENM and timber) will be stored in the bays along the southern boundary.
- 3) Waste processing will include sorting, screening and picking. There will be no shredding or crushing on site.
- 4) Waste deposited in the hand unloading area will be collected at the end of each day and taken to the main shed for processing.
- 5) Sorting will mostly occur within the main processing shed. A range of mobile plant (eg excavator, front-end loader) and a screening/picking line, will be used to handle and process the waste and products in the shed.
- 6) Some waste (less than 20%) will not be able to be recycled onsite (referred to as 'non-recyclable residues'). Non-recyclable residues will be stockpiled undercover prior to being sent for further offsite recycling or disposal at an EPA licensed facility.
- 7) Recycled products generally will be dispatched by heavy vehicle for sale or further processing at another facility.
- 8) Non-recyclable residues will generally be dispatched to a licensed landfill by heavy vehicle.

2.5 Non-recyclable residue

Not all of the material delivered will be able to be separated to allow it to be recycled onsite. This material, or 'non-recyclable residue', will be less than 20% (by mass) of the waste delivered to the waste recycling and transfer facility for processing. The non-recyclable residue will be stockpiled under cover prior to removal for disposal at a landfill.

Figure 2.3 **What really happens – from building site to recycled products**

Waste accepted by the site will typically be in skips from building sites or from homes disposing of unwanted materials in a skip hired for the purpose. A typical journey from one of these skips to recycled products is described below.

Filling a skip



Photograph 2.1 **Example of co-mingled construction waste and a typical skip bin truck**

Builders generally hire skip bins during a construction or demolition project. These skips are used for disposing of a range of inert wastes (ie material that cannot be re-used or that does not require specific handling such as asbestos). For example, a builder undertaking an office refurbishment will dispose of waste from the demolition phase including concrete; bricks; tiles; plaster-board; glass; office partitions; plastic and metal pipes; timber, carpet and synthetic flooring; and plastic and cardboard packaging. Further waste from the construction phase will include excess concrete; wood and metal off-cuts; empty cement bags; cardboard; plastic packing straps and plastic film wrapping. Soil and vegetation could be excavated as part of the construction works for an extension or a new construction.

On many occasions, particularly on smaller construction sites, all of these materials are placed in the site skip bin. When full, the skip is picked up by the waste contractor and the co-mingled waste is generally delivered to a recycler or a landfill for disposal. With the development of this proposed waste recycling and transfer facility, this co-mingled waste can be processed into useful products.

Arrival at the waste recycling and transfer facility



Photograph 2.2 **Examples of wastes accepted (left-to-right: segregated masonry, segregated timber and co-mingled pre-classified waste)**

A skip truck (or other vehicle) entering the waste recycling and transfer facility site will first stop to remove the tarp covering the load. The vehicle will then proceed to the weighbridge area. Here, the full truck will be weighed and the waste will be inspected visually. If the waste contains material that cannot be accepted by the facility (eg asbestos sheeting or closed containers) the driver will be instructed to leave the facility with the load and a record is kept with the particulars of each rejected load. Otherwise, if the load is acceptable the driver will be issued with a docket and will be directed to where the waste is to be unloaded within the facility.

For example, in the case of a construction or demolition project, the skip will contain co-mingled waste. The driver will be issued with a docket stating this and will be directed to the appropriate feed stockpile location in the main processing shed.

Unloading the waste

The waste will be emptied onto clear hardstand adjacent the appropriate feed waste stockpile. The delivered waste will then be inspected while the truck waits. If the waste is accepted, it will be added to the appropriate stockpile. Otherwise, it will be reloaded onto the vehicle that delivered the waste and the driver will be instructed to leave the facility with the load.

Vehicles will leave the site via the wheel wash and weighbridge.

Waste processing

The waste processing will depend on its level of segregation when delivered.

The waste will first be sorted by an excavator using a grab to remove large non-recyclable components.

The co-mingled waste will then be loaded onto the flip-flow screen using an excavator. The flip-flow plant uses a series of conveyors, picking lines, fans and a vibrating screen to separate waste based on size and density. There will be two outputs from the flip-flow:

- rubble (coarse material) and mid-size material finds its way onto the -picking line; and
- <6 mm fines that will be dispatched (after testing and approval) as a natural soil substitute that replaces virgin top soils in a wide range of landscape applications.

The operation of a flip-flow is shown in the following clips:

- <https://www.youtube.com/watch?v=e6d0MWFQCUw>
- <https://www.youtube.com/watch?v=JEU6e2L9A0U>
- <http://www.blue-group.com/en/recycling/fines-cleanup/>

Waste fed onto the picking line will be sorted by hand. Workers standing along the picking line conveyor pick out material that is not suitable for export to a crushing facility.

These wastes will be further sorted as required eg metals will be sorted into ferrous and non-ferrous metals.

Products



Photograph 2.3 Examples of ready-to-use products (left-to-right: building aggregate, shredded timber and soil substitute)



Photograph 2.4 Example recycling feed products (left-to-right: paper/cardboard, plastic and mixed metals)

The wastes will be sorted into ready-to-use products and feeds for further recycling.

For example, the co-mingled waste the construction site skip bin would yield may include:

- Ready-to-use products, including:

- building aggregates from the masonry following sorting, crushing and screening (these would be produced at a Benedict crushing facility at an alternative location);
- mulches and soil substitutes from the screen; and
- timber mulches from the timber following shredding at an alternative Benedict facility.

- Recycling feed products, eg:

- clean, dry paper and cardboard from packaging;
- ferrous and non-ferrous metals from pipes and office fittings; and
- various plastics from packaging and fittings.

These products will be stored in bays. Masonry, soil or timber products will be stored outside while all other products will be stored within the shed.

Dispatch

Products like soil will be dispatched to retailers (eg construction and landscape suppliers); customers (eg local councils) requiring soils; or other Benedict sites for further processing. This will be by a combination of customer and contractor trucks. Non-recyclable residues will be delivered to a licensed landfill by contractor trucks.

2.6 Waste and product storage

It is proposed to accept up to 140,000 tpa of waste at the waste recycling and transfer facility. The proportions of each waste type are unknown and will be variable according to local waste demographics. Therefore, a number of conservative assumptions have been adopted for determining the potential impacts of the waste recycling and transfer facility, as described in Chapter 6.

There will be two primary stockpile types:

- waste feed stockpiles; and
- product stockpiles.

There may also be some intermediate stockpiles formed during processing. These will be located in the external bays along the southern boundary.

Table 2.2 Indicative stockpiles

Type ¹	Waste classification ²	Stockpile location	Comments
Concrete, bricks and tiles Rail ballast and spoils Slags and concrete batching waste Recycled construction materials	Pre-classified general solid waste (non-putrescible)	External bay	Maximum individual stockpile size ³ : 2,500 t, up to 5 m high
Wood	Pre-classified general solid waste (non-putrescible)	External bay	Maximum individual stockpile size ³ : 300 t, up to 5 m high
Screened soil	EPA exempted after testing	External bay	Up to 2,000 t
Co-mingled waste	Pre-classified general solid waste (non-putrescible)	Internal (in shed)	Up to 2,000 t
Green waste	Pre-classified general solid waste (non-putrescible)	External bays	Maximum individual stockpile size ³ : 150 m ³ up to 3 m high

Notes: 1. Actual stockpile types will vary depending on the waste received.

2. EPA (2014b).

3. Multiple stockpiles may be required.

With the exception of segregated inert ‘heavy’ wastes, such as concrete, screened soil and wood and products derived from these materials, all wastes and products will be stored in bins or stockpiles in the shed, including:

- co-mingled wastes; and
- non-recyclable residues.

The inert ‘heavy’ wastes will be stored in external bays prior to quality testing and dispatch. It is noted that the materials for storage will be specifically designated for internal or external storage in order to ensure that environmental impacts, such as the possible release of leachate from paper when it gets wet, are avoided.

2.7 Plant and equipment

Indicative equipment to be used at the waste recycling and transfer facility is listed in Table 2.3. This information has been used in noise and air quality assessments. The actual equipment used may vary but Benedict Industries will ensure that noise and air quality compliance requirements are met.

Table 2.3 Indicative equipment and activities

Plant (or equivalent) ¹	Number	Typical activities
Equipment used across the site		
Front end loader (eg Volvo L150 or equivalent)	1	Unloading and loading trucks Moving waste and products
Trucks (customers)	4–5	Delivering waste and dispatching products Returning to/leaving the site
Equipment used in main shed		
13 t excavator	1	Sorting waste using a variety of excavator attachments Loading trucks
Screening plant inside shed	1	Sorting co-mingled waste
Picking line	1	Sorting co-mingled waste from screening plant

Note: 1. As modelled in the air quality assessment (Appendix E) and noise assessment (Appendix F).

2.8 Internal traffic

Traffic movements within the site are largely un-restricted with the entire site consisting of a hard sealed surface. Figure 3.1 of the TIA (Appendix D) shows the proposed arrangements for internal traffic circulation across the site. The public vehicle access area, providing access to the hand-unloading facility, will be delineated from the heavy vehicle area using road-pavement markings and appropriate signage.

Public pedestrian access is limited to the hand-unloading area only, which will be appropriately signed to ensure members of the public remain within this area at all times. Pedestrian access is also provided along the X boundary of the site, between the office/employee facilities and the main processing shed.

2.9 Workforce and hours of operation

The waste recycling and transfer facility will normally accept waste deliveries (from businesses and the public) and dispatch materials between 6 am and 10 pm Monday to Friday and between 6 am and 5 pm on Saturday. It will also normally accept deliveries from 8 am to 4 pm on Sunday, providing an additional day on which the public could deliver recyclable waste to the facility if there is sufficient demand.

This application seeks approval for the facility to accept (but not process) waste 24 hours per day on occasion, for example to accept waste from major infrastructure projects such as road and rail works that require waste disposal at night. It is anticipated that Council will be given 48 hour notice when waste will be delivered between 10 pm and 6 am (ie outside day-to-day operating hours). It is envisaged that this requirement could be enforced through the inclusion of a relevant condition on any consent granted.

Waste processing will normally only occur at the site from 7 am to 4 pm Monday to Saturday. These hours will be extended to 6 pm weekdays if demand is sufficient. There will be no processing on Sundays or public holidays.

The waste recycling and transfer facility is expected to be operated by approximately 8 employees. There are no contractors expected to work onsite except for maintenance and repair works.

2.10 Waste management

Putrescible waste generated by the operation of the waste recycling and transfer facility, such as rubbish from employee lunches and office waste, will be put in a 2 m³ front-lift bin located next to the hand unloading area. Any recyclable waste will be deposited in a commercial recycling wheelie bin in the same location. Both bins will be emptied regularly by a private contractor.

2.11 Construction activities

Construction associated with the proposal will include installing the weighbridges and demountable office and extension of the boundary fence.

No significant ground excavation is anticipated although there may be very minor ground disturbance such as installing anchors for the demountable office as well as installation of footings for fencing.

An initial estimate indicates that the Capital Investment Value of the proposal is around \$2,541,096.00 (refer Appendix J).

2.12 Development contributions

Consultation with the relevant Planning Officer at Camden Council (Jessica Mesiti) on 2 and 5 May 2016, confirmed that the S94 Contributions were addressed and paid as part of the wider subdivision application and that there is no further requirement in this respect.

3 Statutory framework

3.1 Introduction

This chapter provides an overview of the statutory framework relevant to the proposal including State and Commonwealth legislation, and State, regional and local plans and policies.

3.2 Environmental Planning and Assessment Act 1979

The EP&A Act defines the statutory framework for planning approval and environmental assessment in NSW. The EP&A Act is administered by the Minister for Planning, statutory authorities and local councils.

3.2.1 State significant development

The project is a SSD under the *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP) (refer to Section 3.3.2ii). Division 4.1 of Part 4 of the EP&A Act relates to the assessment of SSD. Applications made under Division 4.1 are required by Section 89H to take into consideration the relevant matters referred to in Section 79C of the Act which include:

- (a) the provisions of:
 - (i) any environmental planning instrument, and
 - (ii) any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Secretary has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and
 - (iii) any development control plan, and
 - (iiia) any planning agreement that has been entered into under Section 93F, or any draft planning agreement that a developer has offered to enter into under Section 93F, and
 - (iv) the regulations (to the extent that they prescribe matters for the purposes of this paragraph), and
 - (v) any coastal zone management plan (within the meaning of the Coastal Protection Act 1979).that apply to the land to which the development application relates,
- (b) the likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality,
- (c) the suitability of the site for the development,
- (d) any submissions made in accordance with this Act or the regulations,
- (e) the public interest.

The above matters are considered below and throughout the EIS.

3.2.2 Designated development

Designated development, for the purposes of Section 77A of the EP&A Act, is defined in Schedule 3 of the EP&A Regulation. Schedule 3 of the EP&A Regulation includes particular waste management facilities or works described in Clause 32, including:

- (1) Waste management facilities or works that store, treat, purify or dispose of waste or sort, process, recycle, recover, use or reuse material from waste and:
 - (a) that dispose (by landfilling, incinerating, storing, placing or other means) of solid or liquid waste:
 - (i) that includes any substance classified in the Australian Dangerous Goods Code or medical, cytotoxic or quarantine waste, or
 - (ii) that comprises more than 100,000 tonnes of “clean fill” (such as soil, sand, gravel, bricks or other excavated or hard material) in a manner that, in the opinion of the consent authority, is likely to cause significant impacts on drainage or flooding, or
 - (iii) that comprises more than 1,000 tonnes per year of sludge or effluent, or
 - (iv) that comprises more than 200 tonnes per year of other waste material, or
 - (b) that sort, consolidate or temporarily store waste at transfer stations or materials recycling facilities for transfer to another site for final disposal, permanent storage, reprocessing, recycling, use or reuse and:
 - (i) that handle substances classified in the Australian Dangerous Goods Code or medical, cytotoxic or quarantine waste, or
 - (ii) that have an intended handling capacity of more than 10,000 tonnes per year of waste containing food or livestock, agricultural or food processing industries waste or similar substances, or
 - (iii) that have an intended handling capacity of more than 30,000 tonnes per year of waste such as glass, plastic, paper, wood, metal, rubber or building demolition material, or
 - (c) that purify, recover, reprocess or process more than 5,000 tonnes per year of solid or liquid organic materials, or
 - (d) that are located:
 - (i) in or within 100 metres of a natural waterbody, wetland, coastal dune field or environmentally sensitive area, or
 - (ii) in an area of high watertable, highly permeable soils, acid sulphate, sodic or saline soils, or
 - (iii) within a drinking water catchment, or
 - (iv) within a catchment of an estuary where the entrance to the sea is intermittently open, or
 - (v) on a floodplain, or

- (vi) within 500 metres of a residential zone or 250 metres of a dwelling not associated with the development and, in the opinion of the consent authority, having regard to topography and local meteorological conditions, are likely to significantly affect the amenity of the neighbourhood by reason of noise, visual impacts, air pollution (including odour, smoke, fumes or dust), vermin or traffic.

The proposal meets the definitions of designated development as it is (among other criteria) defined as 'Waste management facilities or works' that would have 'an intended handling capacity of more than 30,000 tonnes per year of waste such as glass, plastic, paper, wood, metal, rubber or building demolition material' and would involve 'crushing, grinding or separating works' that 'have an intended processing capacity of more than 150 tonnes per day or 30,000 tonnes per year'.

Clause 79 of the EP&A Act details specific requirements for public participation that apply to an SSDA for designated development.

- (1) Public exhibition and notification
 - As soon as practicable after a development application is made for consent to carry out designated development, the consent authority must:
 - (a) place the application and any accompanying information on public exhibition for a period of not less than 30 days (the submission period) commencing on the day after which notice of the application is first published as referred to in paragraph (d), and
 - (b) give written notice of the application in accordance with the regulations:
 - (i) to such persons as appear to it to own or occupy the land adjoining the land to which the development application relates, and
 - (ii) if practicable, to such other persons as appear to it to own or occupy land the use or enjoyment of which, in its opinion, may be detrimentally affected if the designated development is carried out, and
 - (iii) to such other persons as are required to be notified by the regulations, and
 - (c) cause notice of the application to be exhibited in accordance with the regulations on the land to which the application relates, and
 - (d) cause notice of the application to be published in accordance with the regulations in a newspaper circulating in the locality.

3.2.3 Integrated development

Integrated development is development that requires one or more of the approvals identified in Section 91 of the EP&A Act. The proposal is integrated development as it requires an environment protection licence (EPL) under the *Protection of the Environment Operations Act 1997* (POEO Act) (see Section 3.4.1). Although the proposal includes works within 40 m of a waterbody, under Section 89J of the EP&A Act, an activity approval (other than an aquifer interference approval) under Section 91 of the *Water Management Act 2000* (WM Act) is not required for SSD that is authorised by a development consent (refer to Section 3.4.2).

Section 91A of the EP&A Act applies to the determination of an SSDA for integrated development.

...

- (1) Before granting development consent to an application for consent to carry out the development, the consent authority must, in accordance with the regulations, obtain from each relevant approval body the general terms of any approval proposed to be granted by the approval body in relation to the development. Nothing in this Section requires the consent authority to obtain the general terms of any such approval if the consent authority determines to refuse to grant development consent.
 - (2) A consent granted by the consent authority must be consistent with the general terms of any approval proposed to be granted by the approval body in relation to the development and of which the consent authority is informed. For the purposes of this Part, the consent authority is taken to have power under this Act to impose any condition that the approval body could impose as a condition of its approval.
 - (3) If the approval body informs the consent authority that it will not grant an approval that is required in order for the development to be lawfully carried out, the consent authority must refuse consent to the application.
 - (4) If the approval body fails to inform the consent authority, in accordance with the regulations, whether or not it will grant the approval, or of the general terms of its approval:
 - (a) the consent authority may determine the development application, and
 - (b) if the consent authority determines the development application by granting consent:
 - (i) the approval body cannot refuse to grant approval to an application for approval in respect of the development, and
 - (ii) an approval granted by the approval body must not be inconsistent with the development consent, and
 - (iii) Section 93 applies to an approval so granted as if it were an approval the general terms of which had been provided to the consent authority,
- despite any other Act or law.
- (5) If a development application is determined, whether or not by the granting of development consent, the consent authority must notify all relevant approval bodies of the determination.

3.3 Relevant provisions

This Section gives consideration to the relevant provisions of the regulations and environmental planning instruments as required by Section 79C(1)(a) of the EP&A Act. No proposed instruments, planning agreements or coastal zone management plans are relevant to the project. Further, Clause 11 of the SRD SEPP (refer to Section 3.3.2 ii) states that development control plans do not apply to SSD and therefore, the Camden DCP 2011 has not been considered specifically.

3.3.1 NSW Environmental Planning and Assessment Regulation 2000

Part 6 of the EP&A Regulation details procedures relating to SSDAs. Schedule 2 of the EP&A Regulation relates to the preparation of EIS's and in particular, clauses 6 and 7 of this schedule prescribe the form and content of an EIS. The Schedule 2 requirements, and where they are addressed in this EIS, are set out in Table 3.1.

Table 3.1 **Schedule 2 requirements for an EIS**

Requirement	Where contained in the EIS
Name, address and professional qualifications of the person(s) who prepared the EIS	Certification page
Name and address of the responsible person (the applicant)	Certification page
Address of land	Section 1.3
Description of development	Chapter 2
Assessment of the environmental impact	Chapter 6
Declaration that the EIS has been prepared in accordance with this Schedule, contains all available information that is relevant to the environmental assessment of the development and that the information contained in the statement is neither false nor misleading	Certification page
Summary of the EIS	Executive summary
A statement of the objectives of the development	Section 1.4.1
An analysis of feasible alternatives, having regard to its objectives, including the consequences of not carrying out the development	Section 1.4.3
A full description of the development	Chapter 2
A general description of the environment likely to be affected by the development	Section 1.3
The likely impact on the environment of the development	Chapter 6
A full description of the measures proposed to mitigate any adverse effects of the development	Chapter 6
A list of any approvals that must be obtained under any other Act or law before the development, activity or infrastructure may lawfully be carried out	Sections 3.2.2 and 3.2.3
A compilation of the measures proposed to mitigate any adverse effects of the development	Table 7.1
The reasons justifying the carrying out of the development, activity or infrastructure in the manner proposed, having regard to biophysical, economic and social considerations, including the principles of ecologically sustainable development	Section 1.4

3.3.2 Environmental planning instruments

i State Environmental Planning Policy (Infrastructure) 2007

Part 3, Division 23 of the *State Environmental Planning Policy (Infrastructure) 2007* (the Infrastructure SEPP) relates to waste or resource management facilities. Under Clause 121, development for the purpose of waste or resource management facilities is permissible with consent in a prescribed zone. A prescribed zone includes land zoned IN1 General Industrial. The site is zoned IN1 General Industrial under the Camden LEP 2010. Therefore, the project is permissible with consent.

Schedule 3 of the Infrastructure SEPP details traffic generating development that is to be referred to the Roads and Traffic Authority (RTA) (now RMS) and includes recycling facilities of any size or capacity. Clause 104 of the Infrastructure SEPP requires the RMS to be notified of an application for traffic generating development.

Consultation with the RMS is outlined in Table 4.1.

ii State Environmental Planning Policy (State and Regional Development) 2011

The SRD SEPP, amongst other matters, defines certain development as SSD. Clause 8 of the SRD SEPP states:

- (1) Development is declared to be State significant development for the purposes of the [EP&A] Act if:
 - (a) the development on the land concerned is, by the operation of an environmental planning instrument, not permissible without development consent under Part 4 of the Act, and
 - (b) the development is specified in Schedule 1 or 2.

The project is permissible with consent by virtue of the Infrastructure SEPP.

Schedule 1 of the SRD SEPP defines a range of general SSDs, including waste and resource management facilities. Clause 23 Waste and resource management facilities includes the following:

...

- (2) 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.

...

- (3) Development for the purpose of resource recovery or recycling facilities that handle more than 100,000 tonnes per year of waste.

The project will handle up to 140,000 tpa of waste and is therefore development specified in Schedule 1.

The proposal meets both the requirements of clause 8 of the SRD SEPP and is therefore deemed to be SSD. Development consent for the project will be sought from the Minister for Planning.

Clause 11 of the SRD SEPP states in relation to the exclusion of application of development control plans:

Development control plans (whether made before or after the commencement of this policy) do not apply to:

- (a) State significant development, or
- (b) development for which a relevant council is the consent authority under section 89D (2) of the Act.

The proposal has not therefore been assessed against the requirements of Camden DCP.

iii State Environmental Planning Policy No. 33 – Hazardous and Offensive Development

Under SEPP 33 a preliminary hazard assessment (PHA) prepared in accordance with the current circulars or guidelines must be submitted with a SSDA for potentially hazardous or offensive development. The guideline *Applying SEPP 33* (DoP 2011a) includes a checklist and a risk screening procedure to determine whether a development is potentially hazardous or offensive.

An assessment against *Applying SEPP 33* found that the project is not potentially hazardous (see Section 5.4). Further, the project will not pose a significant risk to or have a significant adverse impact on human health, life, property or the biophysical environment (see Chapter 5). The project is not a potentially hazardous or offensive industry and therefore, a PHA is not required.

iv State Environmental Planning Policy No. 55 – Remediation of Land

A desktop study has been undertaken by EMM to determine whether or not the site is potentially contaminated under *State Environmental Planning Policy 55* (SEPP 55).

a. Development controls and planning policies

Planning certificates, obtained under section 149 of the EP&A Act, specify the development controls and planning policies that apply to the land, including contamination issues.

Planning Certificate ref.20160465 for the site, issued on 16 February 2016, was reviewed for contamination issues. There are no references to contamination issues or audits applicable to the site.

b. NSW EPA contaminated land: record of notices

The EPA's Contaminated Land Public Record register (under Section 58 of the *Contaminated Land Management Act 1997* (CLM Act)) lists sites for which the EPA has issued regulatory notices under the CLM Act. The register includes the details of current and former regulatory notices issued.

A search of this register (undertaken on 24 March 2016) did not identify any reported contamination or any regulatory notices issued for suburbs of Smeaton Grange, Mount Annan, Currans Hill and Narellan in the Camden LGA.

c. NSW EPA contaminated land: sites notified

NSW EPA's register of contaminated sites notified to the EPA under Section 60 of the CLM Act, provides an indication of the management status of that particular site. Under Section 60 of the CLM Act, properties must be registered with EPA if there is reason to suspect the land is contaminated, and one or more of the notification triggers in the Duty to Report guidelines exist at the site. Upon receipt of a Section 60 notification, the EPA assesses the contamination status of the site to determine whether the contamination is significant enough to warrant regulation by the EPA.

A search of this public register, (dated 27 October 2015), for Smeaton Grange did not return any records of reported contamination or any regulatory notices. There were no notified sites in the suburbs of Mount Annan and Currans Hill that were within 5 km of the site.

Narellan had three listed sites, 2-3 km to the south-west of site: a former landfill, and two Caltex service stations. The service stations are under assessment and the landfill does not require regulation under the CLM Act. Groundwater flow from these notified sites is likely to the north, consistent with the topographic gradient. Therefore the potential for contamination migration via groundwater flow to Anderson Road is considered low, if groundwater contamination is even present.

d. **NSW EPA: environmental protection licences**

The NSW (POEO Act requires EPLs, issued by the EPA, to be held by owners or operators of premises where the activities being undertaken are potentially contaminating activities listed in Schedule 1 of the POEO Act. An EPL typically includes conditions that relate to pollution prevention, monitoring and reporting.

A search of the EPA's POEO public register (dated 3 July 2015) was undertaken for the Camden LGA, with focus on the suburbs of Smeaton Grange and Narellan and Mount Annan.

Endeavour Energy has a waste storage facility 800 m to the south south-west of site, where hazardous and restricted solid and liquid wastes are stored. Review of this facility indicates that the site is sealed with all waste storage contained indoors, meaning the potential for environmental contamination and subsequent off site migrations is low.

No other EPLs were listed within a 4 km radius of site listed.

e. **Conclusion**

State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55) provides for a statewide planning approach to the remediation of contaminated land. Under clause 7(1) of SEPP 55, prior to granting consent to the carrying out of any development on land, a consent authority is required to give consideration as to whether land is contaminated and, if the land is contaminated, whether the land is suitable for the purpose of the development or whether remediation is required.

Clause 6 of SEPP 55 states the following in relation to rezoning:

(1) In preparing an environmental planning instrument, a planning authority is not to include in a particular zone (within the meaning of the instrument) any land specified in subclause (4) if the inclusion of the land in that zone would permit a change of use of the land, unless:

- (a) the planning authority has considered whether the land is contaminated, and
- (b) if the land is contaminated, the planning authority is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for all the purposes for which land in the zone concerned is permitted to be used, and
- (c) if the land requires remediation to be made suitable for any purpose for which land in that zone is permitted to be used, the planning authority is satisfied that the land will be so remediated before the land is used for that purpose.

Given that the site is located within a recently approved industrial subdivision and the land was formerly used for agricultural purposes, it is assumed that the land would have been rezoned and that such a planning proposal to rezone the land would have given due consideration to the requirements of clause 6. There is also no evidence of contamination at the site or immediate surrounds based on a review of the relevant EPA registers.

Further, a DA would also have been granted for subdivision of the land at which stage the requirements of clause 7 of SEPP 55, relating to contamination and remediation to be considered in determining development application, would have been met.

Therefore, by virtue of the rezoning and subdivision of land in which the site is contained, it is considered that if the land had been contaminated, sufficient remediation would have been undertaken to render it suitable for industrial purposes.

Notwithstanding, there will be minimal soil disturbance and no groundwater interaction during the construction of the waste recycling and transfer facility (refer to Section 2.9), and the majority of the site will be sealed during operation. Therefore there is very minimal potential for exacerbation of any potential soil contamination, associated with the construction phase only. The construction contractors will adhere to the procedures set out in Table 7.1 on finding potentially contaminated material.

Given this, the proposal is in accordance with the requirements of SEPP 55.

v [Sydney Regional Environmental Plan No 20—Hawkesbury-Nepean River \(No 2—1997\)](#)

The Sydney Regional Environmental Plan No 20—Hawkesbury-Nepean River (No 2—1997) (SREP 20) applies to land within Camden local government area (LGA). Part 2 of SREP 20 identifies the considerations, policies and strategies that are to be taken into consideration by the consent authority when determining an SSDA to which the plan applies. Further, Part 3 of SREP 20 identifies additional matters for consideration specific to the type of development. The matters for consideration for waste management facilities or works include:

- (a) Any potential for groundwater contamination.
- (b) The adequacy of the proposed leachate management system and surface water controls.
- (c) The long-term stability of the final landform and the adequacy of the site management plan.
- (d) If extraction of material is involved in the creation or other development of the waste management site, whether the extractive operation will have an adverse impact on the river system.

The above matters have been considered in Sections 6.5.3 and 6.5.4 of this EIS.

vi [Camden Local Environmental Plan 2010](#)

The site is zoned IN1 General Industrial under the LEP. Development for the purposes of a '*waste or resource transfer station*' and '*waste or resource management facility*' are permissible with consent within the IN1 zone. The project is consistent with the objectives of the IN1 zone which are:

- to provide a wide range of industrial and warehouse land uses;
- to encourage employment opportunities;
- to minimise any adverse effect of industry on other land uses;
- to support and protect industrial land for industrial uses;
- to enable other land uses that provide facilities or services to meet the day to day needs of workers in the area; and
- to enable non-industrial land uses that are compatible with and do not detract from the surrounding industrial and warehouse land uses.

The proposal's compliance with relevant standard and provisions of the LEP is detailed in Table 3.2. As previously noted, development control plans do not apply to SSD and therefore the Camden DCP 2011 has not been specifically considered.

Table 3.2 Camden Local Environmental Plan 2010 provisions

Provisions	Compliance
4.3 Height of Buildings The LEP specifies a maximum building height for the site at 11 m.	The project complies with this standard as shown in Appendix C.
4.4 Floor Space Ratio The LEP specifies a floor space ratio for the site of 1:1.	Yes
5.9 Preservation of trees	No trees are to be removed.
5.11 Bush fire hazard reduction Bush fire hazard reduction work authorised by the <u>Rural Fires Act 1997</u> may be carried out on any land without development consent.	n/a
7.1 Flood planning (3) Development consent must not be granted to development on land to which this clause applies unless the consent authority is satisfied that the development: (a) is compatible with the flood hazard of the land, and (b) is not likely to significantly adversely affect flood behaviour resulting in detrimental increases in the potential flood affectation of other development or properties, and (c) incorporates appropriate measures to manage risk to life from flood, and (d) is not likely to significantly adversely affect the environment or cause avoidable erosion, siltation, destruction of riparian vegetation or a reduction in the stability of river banks or watercourses, and (e) is not likely to result in unsustainable social and economic costs to the community as a consequence of flooding.	Flooding is not an issue for the site because the drainage channels in the subdivision have capacity to convey the 100 yr ARI flood flows with freeboard. The proposal does not introduce structures which will be sensitive to flood damage. The proposed development conforms to the Council and State Government flood management requirements.

3.4 Other State legislation

3.4.1 Protection of the Environment Operations Act 1997

The POEO Act is the principal NSW environmental protection legislation and is administered by the EPA. Section 48 of the POEO Act requires an EPL to undertake scheduled activities at a premise. Scheduled activities are defined in Schedule 1 of the POEO Act and include the following premise-based activities that apply to the project:

- resource recovery – having on site at any time more than 1,000 tonnes or processing more than 6,000 tonnes per year of general waste;
- waste processing (non-thermal treatment) – having on site at any time more than 1,000 tonnes or processing more than 6,000 tonnes per year of general waste; and
- waste storage – received from off-site and storing of more than 1,000 tonnes of waste at any time or more than 6,000 tonnes per year.

As the project involves scheduled activities it will require an EPL under the POEO Act. Under Section 89K of the EP&A Act, an EPL cannot be refused if it is necessary for carrying out SSD that is authorised by a development consent, and is to be substantially consistent with that development consent.

3.4.2 Water Management Act 2000

The WM Act regulates the use and interference with surface and groundwater in NSW where a water sharing plan has been implemented. Section 91(2) of the WM Act requires an activity approval for the carrying out of a controlled activity in, on or under waterfront land.

The project includes works within 40 m of a watercourse. Under Section 89J of the EP&A Act, an activity approval (other than an aquifer interference approval) under Section 91 of the WM Act is not required for SSD that is authorised by a development consent.

Notwithstanding, Department of Industry Water (DPI Water) have been provided with details of the proposal and will continue to be consulted (refer to Table 4.1).

3.4.3 Contaminated Land Management Act 1997

The NSW *Contaminated Land Management Act 1997* is administered by the EPA. It establishes a process where the significant contamination of land is investigated and, where appropriate, remediated.

The site is not identified as 'contaminated' under the Act (refer to Section 3.3.2iv).

3.4.4 Rural Fires Act 1997

The NSW *Rural Fires Act 1997* (RF Act) aims to prevent, mitigate, and suppress bush and other fires in local government areas of the State. Section 63(2) of the RF Act requires the owners of land to prevent the ignition and spread of bushfires on their land. Under Section 89J of the EP&A Act, a bush fire safety authority under Section 100B of the RF Act is not required for SSD that is authorised by a development consent.

The site is partially mapped as bushfire prone according to Camden Council mapping (Camden Council 2013). A bushfire risk assessment has been prepared for the project and is included as Appendix I. The recommended measures in the bushfire risk assessment are described in Section 6.8 and will ensure that the risk of bushfire ignition and spread will be as low as practically possible.

3.5 Commonwealth legislation

Under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), actions that may have a significant impact on a matter of national environmental significance (MNES) are 'controlled actions' and require approval from the Commonwealth. MNES include world heritage properties, wetlands of international importance, and listed threatened species and ecological communities.

The proposal will not have any significant impacts on any MNES and, accordingly, a referral to the Commonwealth Minister for the Environment has not been made.

4 Consultation

4.1 Consultation to date

The SEARs for the proposal (refer to Appendix B) require consultation with the following stakeholders:

- EPA;
- OEH;
- DPI;
- DPI Water;
- RMS; and
- the surrounding landowners and occupiers that are likely to be impacted by the proposal.

Consultation with all the above stakeholders has been undertaken for the proposal. The method and outcomes of the consultation are detailed in Table 4.1.

Table 4.1 **Summary of consultation**

Stakeholder	Consultation methods	Outcomes
Government agencies		
AGL	Consultation letter sent 2 February 2016 inviting input into the EIS.	No response received.
EPA	A summary of the proposal was sent to the EPA and they provided input into the preparation of the EIS through the SEARs. A letter was sent to EPA on 2 March 2016 inviting further input.	This EIS has been prepared in accordance with EPA comments included with the SEARs. No response to consultation letter was received.
OEH	A summary of the proposal was sent to the OEH and they provided input into the preparation of the EIS through the SEARs. Consultation letter sent on 2 March 2016 inviting further input.	OEH responded that they had no further inputs regarding the proposal.
DPI	A summary of the proposal was sent to the DPI and they provided input into the preparation of the EIS through the SEARs. A letter was sent to DPI Geological Survey of NSW (GSNSW) on 2 March 2016 inviting further input.	This EIS has been prepared in accordance with EPA comments included with the SEARs. The GSNSW team of DPI responded by email on 7 March 2016 and has no concerns with the proposal as it has no impacts upon mineral or extractive resources, nor upon coal or petroleum production.
DPI Water	Consultation letter sent on 2 March 2016 inviting further input.	No response received.

Table 4.1 **Summary of consultation**

Stakeholder	Consultation methods	Outcomes
RMS	RMS were briefed and provided input into the preparation of the EIS through the SEARs. A summary of the proposal was sent to the RMS and they provided input into the preparation of the EIS through the SEARs.	This EIS has been prepared in accordance with RMS comments included with the SEARs. No response to consultation letter received.
Camden Council	Pre-DA meeting held 7 December 2015 .	Following the Pre-DA meeting, NCC issued preliminary planning advice and information for preparation of a DA (9 December 2015). The EIS has been prepared to address this advice.
Surrounding landowners/occupiers		
Coles Logistics (contact: Tony Glogowski)	Applicant's representative met with the contact at Coles Logistics on 22 March 2016 and briefed about the proposal.	No objection to the proposal.
Axis Building Group (contact: Clive Jacobsen)	Applicant's representative met with the contact at Axis Building Group on 22 March 2016 and briefed about the proposal.	No objection to the proposal.
3 Ashford Circuit, Currans Hill, NSW	Door knock by applicant's representatives on Saturday 23 April. Residents home.	Benedict information fact sheet supplied, resident offered no concerns.
11 Linton Road, Currans Hill, NSW	Door knock by applicant's representatives on Saturday 23 April. Residents home.	Benedict information fact sheet supplied, resident offered no concerns.
9 Linton Road, Currans Hill, NSW	Door knock by Benedict representatives. Residents not at home.	Benedict information fact sheet left at premise together with Ian Collier's business card.
7 Linton Road, Currans Hill, NSW	Door knock by Benedict representatives. Residents not at home.	Benedict information fact sheet left at premise together with Ian Collier's business card.
5 Linton Road, Currans Hill, NSW	Door knock by Benedict representatives. Residents not at home.	Benedict information fact sheet left at premise together with Ian Collier's business card.
3 Linton Road, Currans Hill, NSW	Door knock by Benedict representatives. Residents not at home.	Benedict information fact sheet left at premise together with Ian Collier's business card.
1 Linton Road, Currans Hill, NSW	Door knock by applicant's representatives on Saturday 23 April. Residents home.	Benedict information fact sheet supplied, resident offered no concerns.
20 Chapman Circuit, Currans Hill, NSW	Door knock by Benedict representatives. Residents not at home.	Benedict information fact sheet left at premise together with Ian Collier's business card.
18 Chapman Circuit, Currans Hill, NSW	Door knock by Benedict representatives. Residents not at home.	Benedict information fact sheet left at premise together with Ian Collier's business card.

Table 4.1 **Summary of consultation**

Stakeholder	Consultation methods	Outcomes
16 Chapman Circuit, Currans Hill, NSW	Door knock by applicant's representatives on Saturday 23 April. Residents home.	Benedict information fact sheet supplied, resident asked if the development was going to "be a tip". Ian Collier explained that no waste would be landfilled onsite but that the waste would be recycled. Materials such as soil, bricks & concrete, cardboard etc would be recycled for reuse. Resident said that was good and offered no further comments.
17 Chapman Circuit, Currans Hill, NSW	Door knock by Benedict representatives. Residents home.	Benedict information fact sheet supplied, resident offered no concerns.
79 Downes Cres, Currans Hill, NSW	Door knock by Benedict representatives. Residents home.	Benedict information fact sheet supplied, resident offered no concerns.

A copy of the fact sheet given to/left for local residents is provided in Appendix K. The twelve residences closest to the site have been consulted however, it is anticipated that as a minimum, the 22 residential receivers identified in the acoustic and air quality assessments will be contacted by a representative of the applicant as soon as the application is publically exhibited (including re-consultation of the 12 residences already consulted).

4.2 Proposed consultation

This EIS will be placed on public exhibition. Benedict will respond to any submissions regarding the proposal. This may also highlight the need to consult with any individuals or groups with a particular interest in the proposal.

The ongoing consultation is planned with the following:

- CC: regarding this EIS, development approval and subsequent consents;
- EPA: regarding an EPL;
- agencies providing comment on this EIS;
- one-on-one consultation regarding the EIS and upcoming activities at the site if requested by neighbours/adjoining occupiers; and
- utilities (water, sewerage and power) regarding reconnecting services to the site.

5 Hazards

5.1 Introduction

This chapter considers whether the proposal is a potentially hazardous or offensive development according to SEPP 33 and whether a PHA is required. It references *Applying SEPP 33* (DoP 2011a) and the *Hazardous Industry Planning Advisory Paper No 4: Risk Criteria for Land Use Safety Planning* guidelines (DoPc 2011).

5.2 Hazardous materials

5.2.1 Applying SEPP 33 risk screening method

i Hazardous materials stored, processed or handled

Potentially hazardous or offensive development is defined by SEPP 33 as development which poses a significant risk to, or which would have a significant adverse impact on, human health, life, property or the biophysical environment, if it were to operate without employing any control measures. This includes developments for the handling, storing or processing of hazardous materials. A development is classified as a hazardous or offensive development if the thresholds in *Applying SEPP 33* — which compare the quantities of stored or used hazardous materials to the distance from publicly accessible areas — are exceeded. The hazardous materials classifications in the *Australian Code for the Transport of Dangerous Goods by Road and Rail* (National Transport Commission 2007) (the Dangerous Goods Code) are used in *Applying SEPP 33*.

The hazardous materials that are proposed to be stored and used under the proposal are diesel, oils and grease. The storages, quantities and hazardous properties of the materials are provided in Table 5.1. These materials will be stored in a sealed shipping container with the exception of diesel which will be stored in a purpose built 30,000 L tank in accordance with Australian Standards.

No hazardous wastes will be accepted onto the site.

Table 5.1 Dangerous goods and other potentially hazardous materials to be stored onsite

Classification	Name	Storage conditions	Approximate quantity
Dangerous Goods			
Class 2.1 Flammable Gas	Battery terminal spray	Purpose built container, in enclosed storage room	0.4 L
	Hi press spray grease	Purpose built container, in enclosed storage room	0.4 L
	Acetylene	Three size G bottles (for 9.3 m ³ of gas at atmospheric pressure)	30 kg

Table 5.1 Dangerous goods and other potentially hazardous materials to be stored onsite

Classification	Name	Storage conditions	Approximate quantity
Class 2.2 Non-flammable, non toxic gas*	Oxygen	Five size G bottles (for 8.9 m ³ of gas at atmospheric pressure)	12 kg
	Contact cleaner aerosol	Purpose built container, in enclosed storage room	0.4 L
Class 3 Flammable Liquid PG II	Plumbers priming fluid	Purpose built container, in enclosed storage room	0.5 L
	Unleaded petrol	Purpose built container, in enclosed storage room	20 L
	Grip base	Purpose built container, in enclosed storage room	0.4 L
	Gasket sealant	Purpose built container, in enclosed storage room	0.05 L
	Quick dry enamel	Purpose built container, in enclosed storage room	3 L
Class 3 Flammable Liquid PG III	Hi-Tec heavy duty degreaser	Purpose built container, in enclosed storage room	20 L
Class 8 Corrosive substances PG III	Chemtech Heavy Duty Degreaser	Purpose built container, in enclosed storage room	20 L
Class 9 Miscellaneous dangerous substances PG III*	Diesel**	30,000 L metal tank kept in bunded and roofed storage container	30,000 L
Other hazardous materials			
	Flocculent	Purpose built plastic container	1,000 L
	Oils (engine, hydraulic, and diesel)	Purpose built containers, in enclosed storage room	840 L
	Penetrant spray	Aerosol container, in enclosed storage room	4 L
	Concentrated traffic film remover	Purpose built container, in enclosed storage room	20 L
	Lubricant	Purpose built container, in enclosed storage room	0.5 L
	Anti-bacterial soap	Purpose built container, in enclosed storage room	20 L
	Grease	Purpose built container, in enclosed storage room	15 kg
	Coolant	Purpose built container, in enclosed storage room	40 L

Notes: *Exempt from "Applying SEPP" risk screening test.

**The Dangerous Goods Code states that diesel is not subject to the code as it has a flash point of more than 60°C. The Work Practice Data Sheet provided by Chemwatch identifies Diesel as a Dangerous Good Class 9.

Based on the information provided in Table 5.1, a screening test against the thresholds in SEPP 33 for dangerous goods is provided in Table 5.2. All Class 3 PG II and III flammable liquids have been grouped together as Class 3 PG II which has a more stringent screening distance. The term 'sensitive' in the table refers to residential or other more sensitive land uses and 'other' applies to all other land uses (eg commercial or industrial).

The screening test determines that the hazardous materials are not potentially hazardous.

Table 5.2 *Applying SEPP 33 screening test*

Dangerous goods classification	Total quantities	SEPP 33 screening threshold	Potentially hazardous
Class 2.1 (LPG only)	8 t*	10 t	No
Class 2.1 (liquefied excluding LPG)	30 kg	Greater than 500 kg at specified distance	No
Class 3 PG II	50 kg	Greater than 5 t at specified distance	No
Class 8 PG III	20 kg	50 t	No

Notes: *Conversion used for LPG 1 L = 0.53 kg.

ii *Transport of hazardous materials*

Applying SEPP 33 also sets threshold limits for the transportation of hazardous materials to and from a site.

The number of weekly and annual deliveries and the approximate quantities per load to the site are below the SEPP 33 transport screening thresholds as shown in Table 5.3.

Table 5.3 *Applying SEPP 33 transportation screening test*

Hazardous materials	Deliveries		Quantities per load	Potentially hazardous
	Weekly (peak)	Annual		
Class 2.1 Flammable Gas	1	6	7.5 kL	No
Other hazardous materials	4	54	15 kL	No

5.2.2 *Other risk factors*

Applying SEPP 33 requires an assessment of other hazards/risk factors outside the scope of the risk screening method. An assessment of other types of hazards associated with the proposal is provided in Table 5.4.

Table 5.4 *Other types of hazards*

Type of hazard	Comments
Any incompatible materials (hazardous and non-hazardous materials)	No
Any wastes that could be hazardous	No. Wastes delivered to site will be inspected and will not be accepted if they contain hazardous materials (see Section 2.3.4).
The possible existence of dusts within confined areas	No
Types of activities the dangerous goods and otherwise hazardous materials are associated with (storage, processing, reaction, etc.)	Only as indicated in Table 5.1
Incompatible, reactive or unstable materials and process conditions that could lead to uncontrolled reaction or decomposition.	No
Storage or processing operations involving high (or extremely low) temperatures and/or pressure.	No
Details of known past incidents (and near misses) involving hazardous materials and processes in similar industries.	No known incidents involving hazardous materials/processed at recycling industries.

There are no other hazards/risk factors outside the scope of the risk screening method associated with the proposal.

5.2.3 Hazard management

A range of hazard control measures will be implemented during construction and operation of the proposal. Each of these will be appropriate for the hazard they are designed to control and will generally follow the *Hierarchy of Hazard Controls* (WorkCover NSW not dated):

- engineering controls:
 - design: components will be designed and constructed to comply with relevant standards; and
 - enclosure: components will be enclosed as appropriate. For example, tanks will be bunded.
- administrative controls:
 - operating procedures;
 - scheduled maintenance; and
 - training and reinforcing correct work procedures.

The storage and use of hazardous materials will be in accordance with the following Australian Standards:

- *Australian Standard 1940:2004 The Storage and Handling of Flammable and Combustible Liquids;* and
- *Australian Standard 1596:2008 The Storage and Handling of LP Gas.*

5.3 Potentially offensive industry

The air, noise, and water emissions from the proposal have been assessed to determine if it is classified as a potentially offensive industry.

5.3.1 Air quality

Ramboll Environ assessed potential air quality impacts (see Section 6.1 and Appendix E). The assessment found that the particulate emissions of PM₁₀, total suspended particulates (TSP) and dust deposition from the proposal will comply with the relevant criteria at sensitive receptors and will not lead to any unacceptable impacts on the amenity of the area.

5.3.2 Noise

EMM assessed potential noise impacts from the proposal (refer to Section 6.4 and Appendix F). The assessment concluded that noise modelling results predicted that operational noise emissions will not exceed the relevant criteria and will not lead to any unacceptable impacts on the amenity of the area.

It is likely that noise emission from proposed construction activity will be above the recommended noise management level at the assessment locations. Due to this, recommendations have been provided regarding work practices to be considered to minimise construction noise from the proposal.

5.3.3 Water

Surface water from the proposal will be managed by the proposed surface water management system (refer to Section 6.6.3 and Appendices G and H). Any water released will have a suspended solids content of less than 50 mg/L. The proposal will not significantly increase runoff peak flows, discharge volume or the sediment load in runoff. Therefore, the proposal will not have a significant impact on flows or water quality in the receiving environment.

Project related ground excavations, including footings and an onsite detention/sedimentation basin/control device are expected to be less than 2 m deep (refer to Appendix G). These excavations are expected to be shallower than the depth to groundwater and therefore impacts to groundwater in the uppermost competent rock are not expected.

The site will be sealed and this will prevent any potential contamination from entering the groundwater.

5.3.4 Waste

Only inert pre-classified general solid waste (non-putrescible) will be accepted at the facility and no special, liquid, hazardous restricted solid or general solid waste (putrescible) wastes will be accepted at the site.

5.4 Conclusion: Is the proposal a potentially offensive industry?

An assessment of the storage and transport of hazardous materials against *Applying SEPP 33* determined that the proposal is not potentially hazardous.

The proposal will not result in unacceptable levels of pollution that will impact the amenity of the area. Therefore, the proposal is not a potentially offensive industry.

5.5 Other hazards

The following other hazards have been considered:

- Bushfire: the site is mapped as containing bushfire prone land (refer to Appendix I) A Section of the project will be on bushfire prone land and measures will be incorporated in the proposal to enable compliance with the objectives of *Planning for Bushfire Protection* (PBP). Specifically, an asset protection zone (APZ) will be provided and managed to enable fire fighter access, passage for evacuees and to reduce radiant heat at project buildings. The risk of the project initiating a bushfire will be minimised through the implementation of management measures.
- Flooding: flooding is not an issue for the site because the drainage channels in the subdivision have capacity to convey the 100 year ARI flood flows with freeboard. There is a constructed channel alongside the site which was designed, approved and constructed as part of the subdivision. The proposal does not introduce structures which will be sensitive to flood damages, other than the small offices. The proposed development conforms to the Council and State Government flood management requirements.

Camden Council's engineer has confirmed (in an email from Jessica Mesiti (Planning Officer at Camden Council) dated 16 May 2016) that the proposed main processing shed is located above Council's Flood Planning Level. They have also confirmed that the fence proposed along the boundary of the property is located above the 1% AEP flood level, which is in accordance with Section 4.9 of Council's Flood Risk Management Policy. Therefore, the proposed development looks to be acceptable in relation to flooding.

- Sea level rise: sea level rise will not impact on built elements of the site which are at least 8 m above AHD.
- Mine subsidence area: the site is not located within a mine subsidence area.