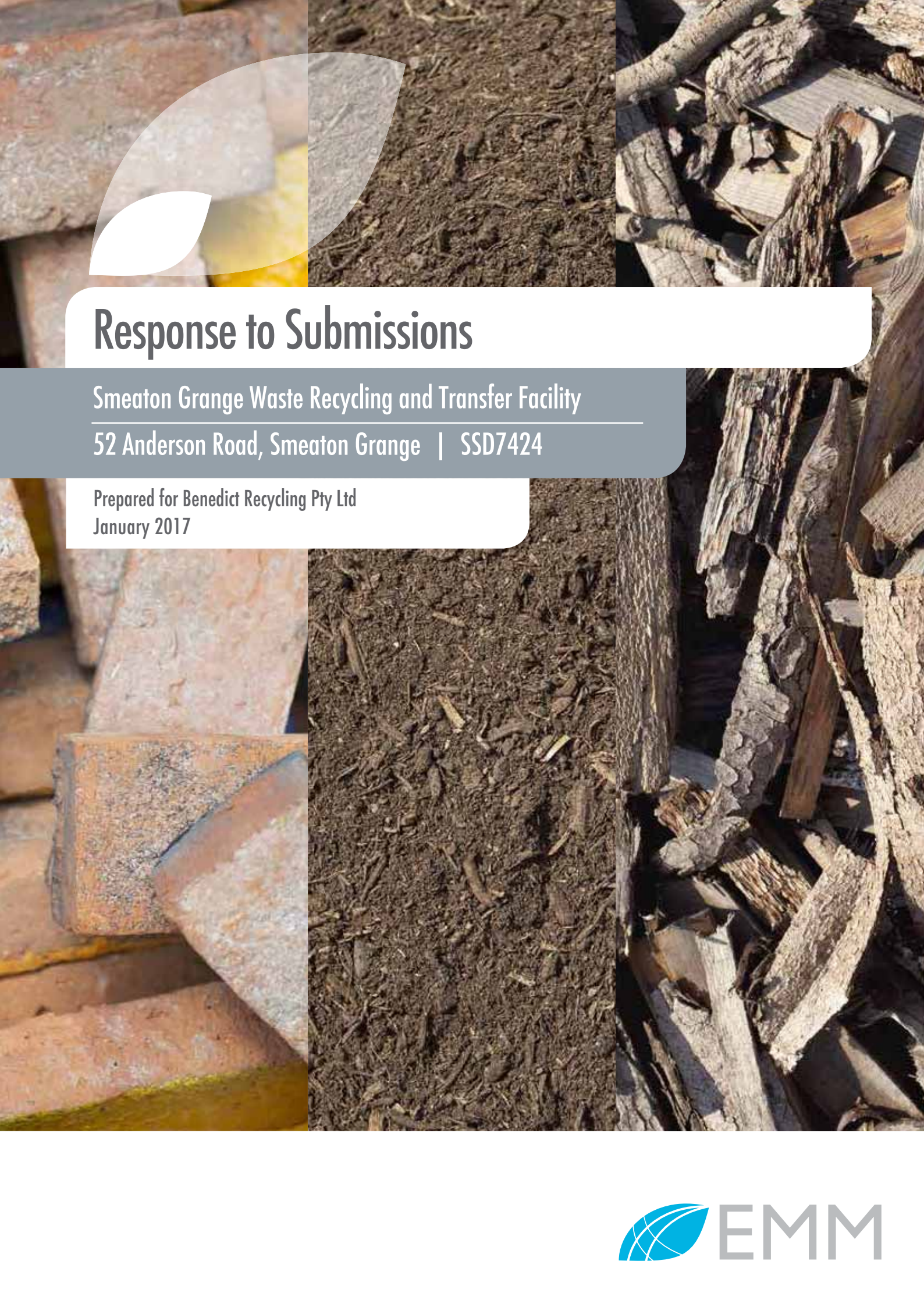




Response to Submissions

Smeaton Grange Waste Recycling and Transfer Facility

52 Anderson Road, Smeaton Grange | SSD7424

Prepared for Benedict Recycling Pty Ltd
January 2017

Response to Submissions

Smeaton Grange Waste Recycling and Transfer Facility | 52 Anderson Road,
Smeaton Grange | SSD 7424

Prepared for Benedict Recycling Pty Ltd | 10 January 2017

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Response to Submissions

Final

Report J15135RP9 | Prepared for Benedict Recycling Pty Ltd | 10 January 2017

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Signature



Date **10 January 2017**

Date **10 January 2017**

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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). The facility will¹ process up to 140,000 tonnes per annum (tpa) of pre-classified general solid (non-putrescible) waste including construction 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 other recycled 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, light materials (dry paper, cardboard, etc), masonry (concrete, bricks, tiles, asphalt, gyprock, fines, etc) and plastics. All of these products will meet recycled feedstock specifications while recovering a range of materials that would otherwise go to a lower order use or be disposed to landfill. It is not proposed to compost, crush or shred any waste onsite.

The facility will provide a convenient and cost effective recycling solution for the area. The 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 facility will provide an environmentally beneficial means of dealing with non-putrescible general solid waste by recycling 80–90% of the materials accepted at the facility.

Benedict Recycling's products are turned into valuable, sustainable products and sold back into the industry for use in variety of applications - timber, concrete, brick, soil and sand which in turn are processed to make recycled soil, aggregate, recycled bedding sand for pipe laying, wood mulch and road base. These products have been utilised in some of the major Sydney projects such as the Barangaroo Development, WestConnex M4 widening, M2 upgrade, NorthConnex, Wet 'n Wild Recreational Park, Sydney Olympic Park and thousands more.

1.1.1 Waste Recycling Process

The waste recycling process is straight forward and involves sorting using mobile equipment such as a grab, screening (ie sorting by size using an automatic screen) and a picking line where employees sort material on a conveyor by hand into different bins. The processing steps are described in EIS Section 2.4 and the box "What really happens – from building site to recycled products".

A waste flowchart is provided in EIS Figure 2.2. An updated flowchart including more details of the on-site activities is provided in Figure 1.1 below.

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'.

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

The sources and types of wastes will vary. An estimate of the proportion of wastes and the corresponding recycled products is provided in Table 1.1 based on the other inert waste recycling plants operated by Benedict Recycling.

All of the materials brought onto the site will be taken from the site as products, as recyclable materials requiring further processing, or as non-recyclable residues (eg rubbish or spoiled recyclables such as contaminated paper/cardboard) 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.

Table 1.1 Waste and products breakdown

Indicative waste → product	Estimated proportion
Soils and fines from excavated materials → off-site use or blending to form recycled topsoil	33%
Concrete, excavated materials, bricks, rail ballast and spoils ('fines' with a particle diameter of less than 8 mm) → off-site crushing and blending to form products such as bedding sands	26%
Concrete, excavated materials, rail ballast and spoils (material with a particle diameter of greater than 8 mm) → off-site crushing and screening to produce aggregates	19%
Clean timber - non-CCA[copper chrome arsenic]-treated, coarse vegetation → off-site shredding and blending to form mulch	5%
Metals (predominately steel) → dispatched to a metals recycler	2%
Rubbish to landfill (plastics, paper/cardboard, concrete-based building products (eg Hardiplank), minor amounts of plaster board, containers, carpet, synthetics, rags, etc)	15% ¹

Note: 1. Generally 10–20%.

1.1.2 Stockpiling of Waste

Indicative stockpile volumes are provided in EIS Table 2.2. Further information on the maximum amounts of waste (by volume rather than by mass) that will be stored on site at any one time is provided in Table 1.2 below.

It is now proposed that the screening area and External Bay 6 will be covered with a roof (approximately 5 m off the ground) to minimise moisture entering the timber stockpiles (Figure 1.2). The roof will be within the site and adjacent to the 10 m tall fence so will not be visible from offsite.

Table 1.2 Maximum stockpile sizes

Stockpile	Types	Maximum volume
Bay 1 (covered)	Fines (particles with a diameter less than 8 mm)	300 m ³
Bay 2 (covered)	Hand-picked light waste	180 m ³
Bay 3 (covered)	Timber	180 m ³
Bay 4	Recycled heavy materials, including concrete, bricks, masonry, tiles, rail ballast and spoils, slags and concrete batching waste	220 m ³
Bay 5	Recycled heavy materials, including concrete, bricks, masonry, tiles, rail ballast and spoils, slags and concrete batching waste	250 m ³ (up to 5 m high)

Table 1.2 **Maximum stockpile sizes**

Stockpile	Types	Maximum volume
Bay 6 (covered)	Timber	250 m ³ (up to 5 m high)
Bay 7	Virgin excavated natural material (VENM)/ excavated natural material (ENM)	800 m ³ (up to 5 m high)
Internal (in shed)	Co-mingled waste Bulk light waste (eg dry paper/cardboard and plastics)	Up to a total of 5,500 m ³ in the main processing shed
Internal (in shed)	Green waste/coarse vegetation	150 m ³ (equivalent to about 30 tonnes)
Skip bin adjacent to Bay 1	Ferrous waste	9 m ³
Skip bin adjacent to Bay 1	Non-ferrous waste	2 m ³

The stockpiles of inert products will be dispatched as quickly as possible, generally within one week of processing. However, with the exception of green waste, longer storage time will not result in any impacts so should not be restricted.

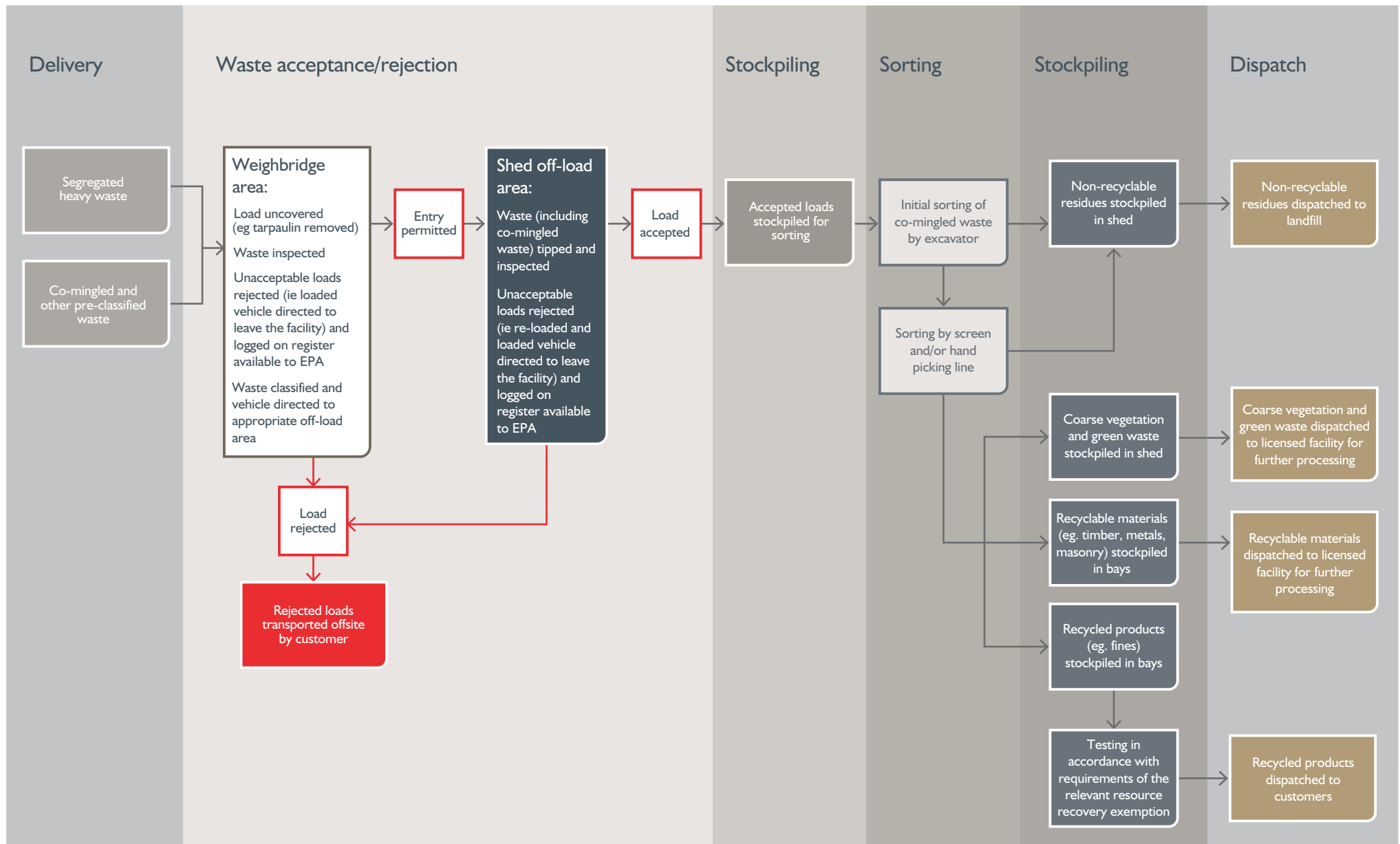
Waste that has a plant origin can be divided into:

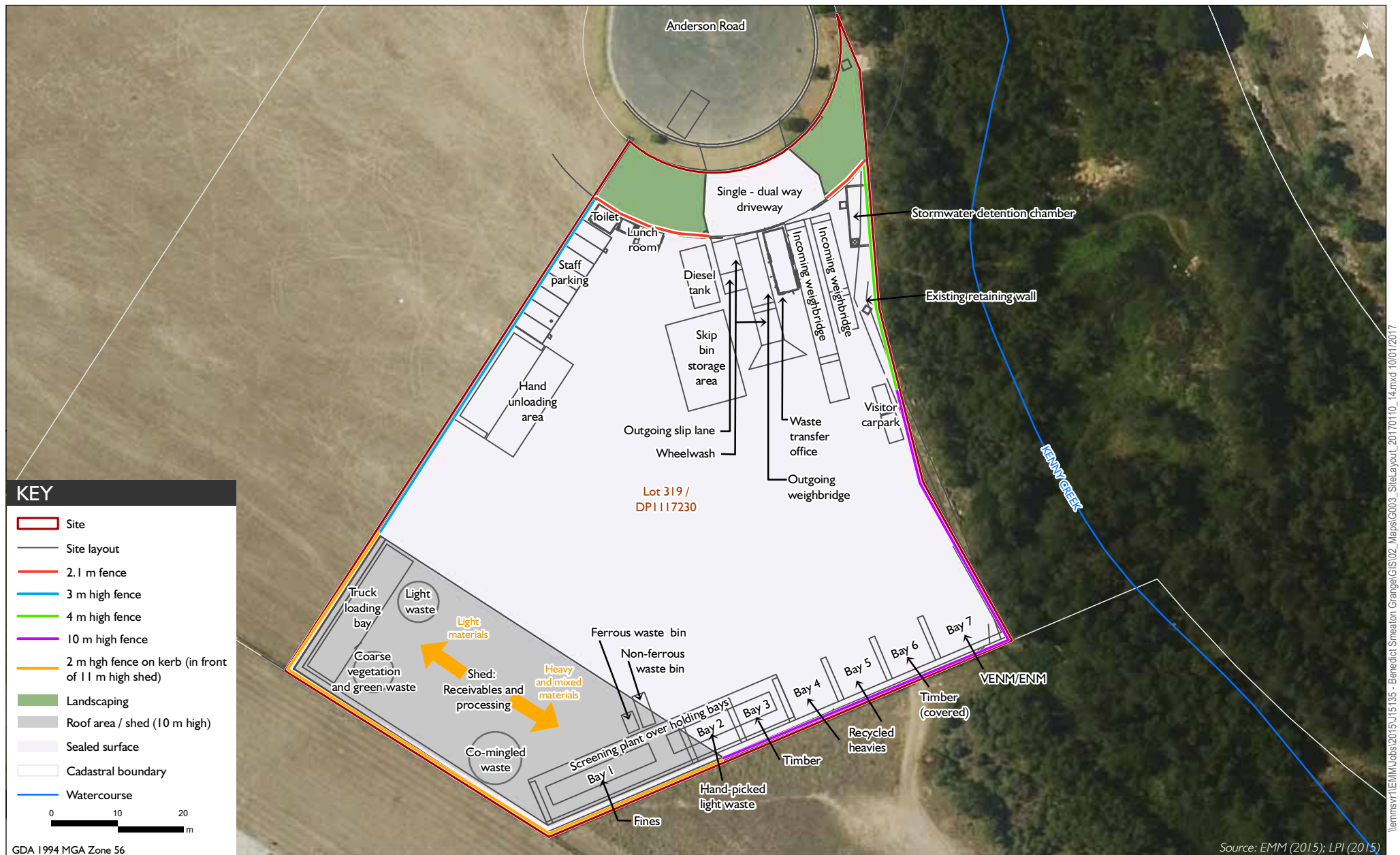
- timber - wood that has been milled and used in buildings, pallets, etc;
- coarse vegetation - unprocessed coarse vegetation waste such as large branches, stumps and roots that take weeks or months to start to decompose/compost; and
- green waste - unprocessed vegetation waste such as grass clippings, leaves, small branches and weeds that may start to decompose/compost almost immediately.

In this RTS report, 'vegetation waste' refers to coarse vegetation, green waste or a combination of both. The facility will receive much more coarse vegetation than green waste (see Section 3.1.7).

Storage of green waste is described in Section 3.1.2.

Kerbside green waste collected by the Camden and neighbouring councils is currently delivered to the Spring Farm waste facility by the councils. The Smeaton Grange Waste Recycling and Transfer Facility will not accept council kerbside green bin waste or putrescible waste.





1.2 Development application

Approval for the facility is being sought under Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A) Act as a state significant development (SSD).

Secretary's Environmental Assessment Requirements (SEARs, SSD 7424) for the proposed facility were first issued by the NSW Department of Planning and Environment (DPE) on 16 December 2015.

The *Smeaton Grange Waste Recycling and Transfer Facility Environmental Impact Statement* (EIS) was prepared by EMM Consulting Pty Limited (EMM 2016), with input from a range of specialists. It was prepared in accordance with the requirements of DPE and other government agencies, including Camden Council (the Council) as provided in the SEARs.

The EIS was placed on public exhibition for seven weeks from 14 July to 26 August 2016. Hard copies were displayed at DPE's Information Centre in Sydney, the Council's offices in Camden and Narellan, and Narellan Library. Electronic copies of the EIS were available from the DPE website.

This Response to Submissions (RTS) report responds to submissions received during, and immediately following, public exhibition of the EIS, including community submissions that were sent to Council directly and were appended to the Council's submission.

1.3 Submission process

Public and non-government organisation submissions were lodged through the DPE website (www.planning.nsw.gov.au), and directly to DPE from government agencies.

1.4 Submissions received

Submissions were received from the following government agencies, non-government organisations and individuals:

- NSW government agencies:
 - Environment Protection Authority (EPA);
 - Department of Primary Industries (DPI);
 - Roads and Maritime Services (RMS);
 - Office of Environment and Heritage (OEH);
 - Rural Fire Service;
- the Council;

- non-government organisations:
 - Frasers Property;
 - Goodman Property Services;
 - Young Academics;
 - Bujutsu Martial Arts; and
- community members (162 submissions, including two that were submitted to the Council but not DPE).

On 5 September, DPE requested a report be prepared that responds to the matters raised in the submissions regarding the facility. A draft RTS report was provided to DPE on 7 November 2016. On 20 December, DPE provided comments from relevant agencies regarding the draft RTS. This RTS report has been prepared to address comments from relevant agencies and stakeholders.

2 Consultation

Benedict Recycling consulted during the preparation of the EIS and has continued to consult regarding the facility since the start of the public exhibition of the EIS in July 2016. This consultation, consultation outcomes and ongoing consultation are described in this chapter.

2.1 Consultation during preparation of the EIS

Consultation during the preparation of the EIS is described in EIS Chapter 4. It included consultation with State government agencies, the Council and surrounding landowners. This included distribution of a factsheet (see EIS Appendix K).

2.2 Consultation following the start of the EIS public exhibition period

Consultation following the start of the EIS public exhibition period is summarised in Table 2.1.

Table 2.1 Summary of consultation following the start of the EIS public exhibition period

Stakeholder	Consultation methods	Outcomes
DPE (Director of Industry Assessment and assessment officer), EPA, the State Member for Camden, local resident representatives, Council (General Manager) and Macarthur Chronicle.	On-site meeting on 22 July 2016	Provided an overview of the proposal and answers to questions raised by Curran Hills residents.
Council	Benedict Recycling letters to individual Councillors on 26 July 2016, inc to the Mayor and Deputy Mayor	Provided information on the proposal and proposed management measures and requested an opportunity to brief each Councillor. Benedict Recycling had follow-up conversations with four Councillors.
	EMM letter to Council on 8 August 2016	Provided responses to draft Council submission to DPE.
	EMM presentation at Council meeting on 9 August 2016	Presentation responding to Council's concerns particularly, night-time operations, traffic and odour.
Currans Hill, Smeaton Grange and Gregory Hills residents and businesses	On site meeting (see above) A community factsheet (provided in Appendix A) was distributed around 21 August 2016 to the parts of Currans Hill and Smeaton Grange closest to the site (see Figure 2.1).	The community was widely informed about the proposal prior to the completion of the public exhibition.
Wider community	Website: www.smeatongrangerecycling.com.au	The website provides information to the wider community about the proposal.

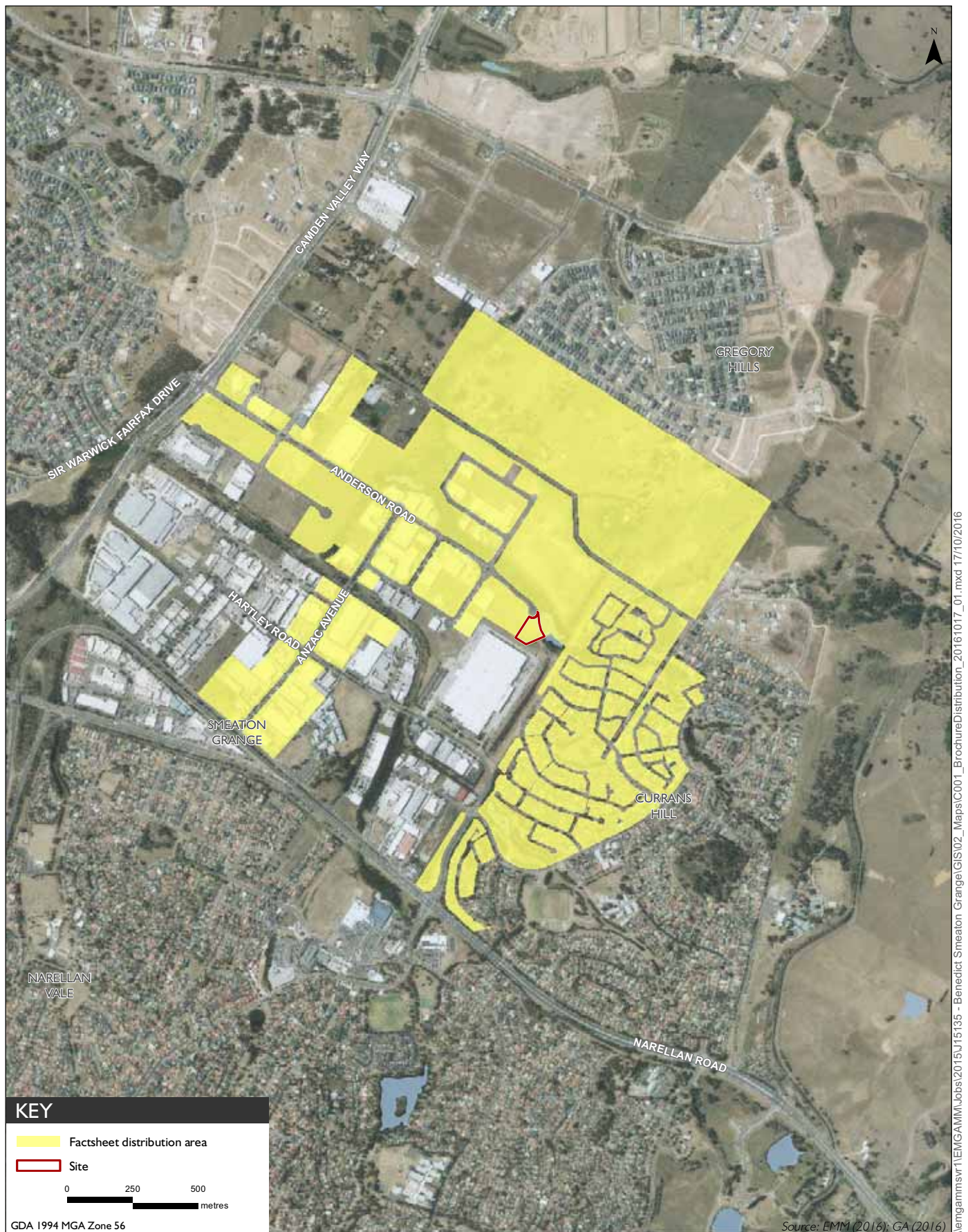
As a result of this consultation and submissions Benedict Recycling has:

- removed night-time operations, between 10 pm to 6 am;
- removed night-time use of Hartley Road;
- clarified that the facility will not accept any kerbside green or putrescible waste collected by councils;
- provided details of the measures that will be taken to prevent green waste composting; and
- committed to a range of other management measures to provide assurance that the facility will operate with minimal impacts.

2.3 Ongoing consultation

Ongoing consultation is planned with the following:

- the Council: regarding this RTS report;
- DPE: regarding this RTS report, to provide any further information required, and regarding the Planning Assessment Commission (PAC) determination process;
- EPA: regarding an Environment Protection Licence (EPL);
- other government agencies as required; and
- one-on-one consultation regarding the proposed facility as requested by neighbours/adjoining occupiers.



Community Factsheet distribution (August 2016)

Smeaton Grange waste transfer station
Response to Submissions

Figure 2.1

3 Government agency submissions

Responses to the government agency submissions, including the Council, are provided below.

3.1 Environment Protection Authority

The EPA did not object to the facility but stated that it was “[u]nable to support the proposal as currently presented”.

As described in Section 2.2, the proposal has been modified as a result of consultation and submissions received. The EPA submission considered the EIS with respect to noise and air quality.

3.1.1 Noise

i Operating hours

The EPA requested the following:

There does not appear to be clear rationale for why the abovementioned operating hours are nominated, particularly those that fall within the night time period.

The EPA is therefore seeking additional feedback from the Proponent justifying the proposed hours of operation. Such justification should include processing rates or other numerical information to support the need for activities to be undertaken during the night time period and why alternatives are not reasonable or feasible noting the comments below.

It is no longer proposed to operate between 10 pm and 6 am.

The hours described in Section 2.9 of the EIS are proposed (as summarised in Table 3.1 below).

Table 3.1 Operating hours

Activity	Hours
Accept waste deliveries and dispatch materials	6 am and 10 pm Monday to Friday 6 am and 5 pm Saturday 8 am to 4 pm on Sunday
Waste processing	7 am to 6 pm Monday to Saturday when there is sufficient demand but normally 7 am to 4 pm There will be no processing on Sundays or public holidays

The EIS assumed the worst-case scenario, that the site will continuously operate during the hours stated in Table 3.1 and found that noise levels will comply with the project specific noise levels (PSNLs) for the evening period (6 pm to 10 pm).

These hours are required in order to service works such as public infrastructure projects such as road and rail construction and maintenance. These types of works are generally scheduled to minimise delays to the public. As a result these often start in, or continue into, the evening. These works generate the types of wastes that would be accepted by the facility assisting the efficient delivery of these public works. The frequency that the facility will accept these wastes will therefore vary over the years depending on when and where the works occur.

Notwithstanding the above, the facility would normally operate from 6 am to 4 pm Monday to Saturday.

It is common for waste contractors carting waste from a construction and/or demolition site to collect a load towards the end of the day and to leave the covered load overnight before delivering it to a waste recycling and transfer facility early in the morning. Delivering the load between 6 am and 7 am allows the vehicle to arrive empty at a site when a construction site opens, generally at 7 am. Hence approval is sought to accept (but not process) waste between 6 am and 7 am.

The site will be shut between 10 pm and 6 am, on Sundays, and on public holidays.

ii Sleep disturbance

The EPA requested the following:

...a detailed analysis including, but not necessarily limited to, the following:

- i. how often the high noise level events above the sleep disturbance criteria will occur;
- ii. the likely distribution of events throughout the night time period;
- iii. whether there are times when there is a clear change in the noise environment (such as during early morning shoulder periods). This must be illustrated by presentation of the level and distribution throughout the night time period of current L_{Amax} (or L_{A1}(1min)) events; and
- iv. any other data or information as relevant.

As it is no longer proposed to operate from 10 pm to 6 am, the analysis of sleep disturbance only applies to the morning shoulder from 6 am to 7 am.

There will be no waste processing between 6 am and 7 am (see Table 3.1) to minimise noise emissions from the site. The wide range of noise management measures that will be implemented as part of the operation of the facility, including from 6 am to 7 am, is described in EIS Section 6.4.2 and summarised in RTS Section 3.6.5xi.

Residences will be shielded from noise levels that exceed project specific noise levels (Table 3.2) by the closed walls and roof of the shed and by the 10 m tall fence that will complete the south-eastern boundary of the site and the southern section of the north-eastern boundary (Figure 1.2).

Table 3.2 Project specific noise levels

Period	PSNL dB(A), L _{eq} (15-min)
Morning shoulder	39
Day	41
Evening	40

Source: Noise Impact Assessment (EIS Appendix F) Table 5.3.

Operational noise levels have been assessed for the daytime, evening and morning shoulder periods² during calm and adverse weather conditions. The noise modelling conservatively assumed that all plant operates simultaneously for the proposed operations, thereby reflecting the worst-case scenario.

Operational noise emission levels are predicted to meet the relevant criteria at all assessment locations for calm conditions during the daytime, evening and morning shoulder periods (*Noise Impact Assessment* Table 6.7). The only exceedence of the project specific noise level is predicted to occur at assessment location R22 when there is a temperature inversion (which only occur in the colder months) during the morning shoulder period (6 am to 7am). Under these circumstances, the noise level at this location is predicted to be 40 dB, which is 1 dB above the project specific noise level for the morning shoulder period (39 dB).

Background noise monitoring at a representative location in Currans Hill (see Section 4.1.1) found that ambient noise levels generally rise from 4 am Monday to Friday due to early morning activities in the Smeaton Grange industrial area. Noise data collected for the morning shoulder period from Monday to Saturday (refer to graphs in *Noise Impact Assessment* Appendix A) indicates that the existing average noise levels ($L_{Aeq,15-min}$) are about 44 dB for the entire morning shoulder monitoring period, which is 5 dB above the calculated project specific noise level for the shoulder period and 4 dB above the predicted noise level from the facility at R22 (40 dB). Therefore, noise levels from the facility are not expected to result in material impacts at this location.

Typical maximum noise events, ie events that are likely to cause sleep disturbance, are likely to include impacts associated with loading/unloading activities. These types of activities may occur as a result of waste deliveries in the morning shoulder period. The adopted rating background level (RBL) used in the *Noise Impact Assessment* (EIS Appendix F) for the morning shoulder period was 34 dB which infers a morning shoulder sleep disturbance screening level of L_{Amax} 49 dB. The highest noise levels from the facility were predicted to be 58 dB (L_{Amax}) at the nearest residences (9 dB above the screening level).

The results of background noise monitoring (provided in Appendix A of the *Noise Impact Assessment*) indicate that ambient noise levels in the area are steadily increasing from approximately 4 am each day and existing maximum noise levels between 6 am and 7 am are typically greater than 60 dB and above 80 dB on occasion, ie well above the highest predicted maximum noise level of 58 dB (L_{Amax}) from the facility. Therefore, the maximum noise levels from the facility between 6 am and 7 am will be within the levels already occurring in the area and the facility will not significantly increase the number of noise events during the morning shoulder period. Therefore, sleep disturbance as a result of the facility is unlikely.

The above information was provided to the EPA as part of the draft RTS. The EPA provided the following response in its letter dated 23 November 2016.

The EPA notes the proposed changes to operating hours outlined in the RTS (no work between 10pm to 6am). As discussed in the RTS, this limits the time for potential sleep disturbance to a one hour period during the morning shoulder period (between 6am and 7am). However, the remaining one hour period is still a concern due to some uncertainties in the noise monitoring data.

² Day: 7 am to 6 pm Monday to Saturday; 8 am to 6 pm Sundays and public holidays; Evening: 6 pm to 10 pm; Morning shoulder: 6 am to 7 am. (Night-time: 10 pm to 7 am Monday to Saturday, 10 pm to 8 am Sundays and public holidays).

In order to address the potential sleep disturbance issue, the EPA provided draft conditions to limit opening hours from 7 am onwards from Monday to Saturday. As noted above, the opening hour of 6 am is critical as it will enable the construction of infrastructure works.

Further, the *Noise Impact Assessment* indicated that maximum noise levels would likely be lower than existing maximum noise levels from 6 am and 7 am. As such, a permanent condition to limit opening hours as suggested is unlikely to achieve benefits for local residents.

As noted in Section 4.1.2, Benedict Recycling will commission noise verification monitoring at the closest residences to the south-east (R9) and to the north-east (R22) (or at equivalent locations) within 3, 6 and 12 months of the start of operations to confirm (or otherwise) the accuracy of the conservatively assessed noise predictions and the site's Environment Protection Licence.

3.1.2 Air quality impacts

The EPA requested the following:

- i. the maximum amount of garden waste proposed to be stockpiled at the site at any one time;
- ii. the maximum length of time garden waste will remain at the site before it is transferred offsite for disposal/recycling at another waste facility;
- iii. the proposed contingency measures that would be implemented should garden waste stockpiled at the facility begin to cause offensive odours; and
- iv. any other data or information as relevant.

If left under the correct conditions, vegetation may compost, producing odours. The time that it takes for composting (and odour generation) to start depends on the size and composition of the piles. Large piles with low oxygen penetration start to compost faster than smaller, open piles. Green waste, such as fine grass clippings can start composting immediately. Conversely, coarser vegetation such as branches and stumps take much longer to start to compost, if at all.

Benedict Recycling's facilities typically only receive coarse vegetation. This coarse vegetation is generally in skip bins mixed with waste from demolition sites.

Houses generating green waste almost always dispose of this material in the free green bin provided by their council rather than hiring a skip bin or otherwise paying for disposal. Businesses generating vegetation waste, such as landscapers, find that it is cheaper to dispose of this vegetation waste if it is not mixed with other wastes. It would be uneconomic for these businesses to deliver this segregated vegetation waste to the facility.

The following management measures will be applied so that vegetation waste will not start to compost or produce odours within the facility:

- no odorous waste will be accepted;
- the minor amounts of vegetation waste (including green waste) that will be accepted at the facility as part of mixed loads will be segregated and stored in the shed (see Figure 1.1);
- vegetation waste will not be stored on site for extended periods;

- vegetation waste will be dispatched to another facility licensed to accept vegetation, as soon as there is enough to fill a truck (see Table 1.2);
- vegetation waste will be monitored daily for any signs that composting is occurring (odour or increased temperature) and if this occurs, the stockpile will be broken apart and arrangements will be made immediately for the material to be dispatched from site in a smaller truck.

Effective procedures for handling of green waste has meant that Benedict Recycling has not received any odour complaints in over 30 years of operations at its facilities that except the same types of wastes as would be accepted by the Smeaton Grange Waste Recycling and Transfer Facility.

The above information was provided to the EPA as part of the draft RTS. The EPA provided the following response in its letter dated 23 November 2016.

The EPA notes the following commitments made by the Proponent in the RTS:

- vegetation waste will not be stored on the premises for extended periods and will be dispatched to another licensed facility as soon as there is enough to fill a truck; and
- vegetation waste will be monitored daily for any signs that composting is occurring (odour or increased temperature) and if this occurs, the stockpile will be broken apart and arrangements made immediately to dispatch the material in a smaller truck.

The EPA is satisfied that these controls, if implemented, will minimise the likelihood of offensive odours being generated by the development.

3.2 Department of Primary Industries

3.2.1 Soils

The DPI requested the following:

It is unclear how excavation into the alluvium will be avoided (EIS Appendix H). Insufficient supporting information has been provided to assess this. It is recommended the proponent provides additional information including:

- a geological map which differentiates the alluvium and the residual soil boundary at the site; and
- the location and details of the monitoring bores.

The proponent should amend Table 7.1 on page 80 of the EIS to include the following mitigation measure:

- excavation into the alluvium on the site is to be avoided, where feasible.

The site is part of the Smeaton Grange industrial estate which has been extensively developed and matters such as the presence of alluvium would have been considered when it was subdivided.

The location and details of the groundwater monitoring bores are provided in Appendix E.

There will only be minor excavations for foundations of supports for the shed and fence. The site will be sealed and any alluvium covered as part of the development.

Excavation into the alluvium on the site will be avoided where feasible.

3.2.2 Groundwater

The DPI requested the following:

Should excavation intercept groundwater at the subject site, and there is a requirement to extract groundwater or to dewater, including any ongoing take of groundwater, then DPI Water needs to be advised and a licence may be required.

As described EIS Section 6.5.4, groundwater is not expected to be intersected. While no significant dewatering is predicted to be required during the construction of footings, DPI Water will be notified and an aquifer interference licence will be obtained if more than 3 ML of groundwater needs to be extracted during construction.

There will be no ongoing groundwater extraction or take.

Further comment from DPI was provided in a letter dated 21 November 2016 in response to the information above, also included in the draft RTS:

The mitigation measure, which relates to water, should be amended to require an assessment to estimate the volume of groundwater likely to be dewatered prior to construction being undertaken. If more than 3 ML/year of groundwater is required to be extracted during construction a temporary dewatering licence under the Water Act 1912 must be obtained from DPI Water prior to construction.

Benedict Recycling will estimate the volume of groundwater likely to be dewatered prior to construction being undertaken.

3.2.3 Rainwater re-use

The DPI note the following:

The proponent may want to consider collecting rainwater in a dedicated rainwater tank instead of the sediment basin as this will not require consideration for licensing. If this water is collected in the sediment dam, then the proponent may require a water access licence if the volumes are in excess of the maximum harvestable right for the property.

The DPI-Water factsheet, *Dams in NSW, Do You Need a Licence?* (DPI 2015) states:

The following dams should not be included when you are calculating the capacity of dams allowed on your property under a harvestable right:

...

3. Dams for the capture, containment and recirculation of drainage and/or effluent that conform to best management practice or are required by regulation to prevent the contamination of a water source. The harvestable right is not intended to be contrary to initiatives to prevent pollution of water sources. Many landholders are required to install dams to capture contaminated water or to collect and re-use irrigation tailwater. These dams are not considered in assessing your harvestable right.

The sedimentation basin will be constructed according best practice as described in the *Water Management Report* (EIS Appendix G) and will be used for capture, containment and recirculation of drainage. Therefore, it is understood that the sedimentation basin meets the exception criteria. However, a water access licence will be obtained if required.

Further comment from DPI was provided in a letter dated 21 November 2016 in response to the information above, included in the draft RTS:

Clean roof water from the proposal should be collected in a rainwater tank rather than the sediment basin to conform with best management practice and to avoid the need for a water access licence from DPI Water.

As noted above, *Dams in NSW, Do You Need a Licence?* appears to exempt the proposed sedimentation basin from the water access license requirement. However, a water access license will be obtained, if required.

Water collected in the proposed sedimentation basin will be utilised after rainfall events for on-site services such as dust suppression and will be the preferred water source when available. The rate of usage after rainfall events will vary based on the particular needs on-site at the time.

As such, the sedimentation basin will serve the same purpose of a rainwater tank for the facility. Adding a secondary water source such as a rainwater tank will add an unnecessary complexity for management of the site.

3.2.4 Fence

The DPI notes the following:

The Ground Floor Plan (Appendix C of the EIS) shows a 4 m high and a 10 m high fence is located beyond the site boundary within the riparian corridor of Kenny Creek. The proponent should clarify whether the fence is an existing structure, or if the fence is to form part of the SSD project. If so, details are required as to why the fence is located within the riparian corridor and not along the site boundary.

All fences and site components will be constructed within Lot 319 DP 1117230. The lines outside of the site boundary in the Ground Floor Plan (EIS Appendix C) are lines indicating the dimensions of site components and do not show proposed structures.

3.3 Roads and Maritime Services

Roads and Maritime Services did not object to the proposal and provided no further comment.

3.4 Office of Environment and Heritage

The Office of Environment and Heritage (OEH) submission states:

After reviewing the relevant documents, OEH's Greater Sydney Planning Team has concluded that the matter does not contain biodiversity, natural hazards or Aboriginal cultural heritage issues that require a formal OEH response. We have no further need to be involved in the assessment of this project.

3.5 Rural Fire Service

3.5.1 Bush fire protection measures

The NSW RFS recommend the following bush fire protection measures:

- Appropriate and clear separation of buildings, combustible materials and fuels from bush fire hazards

Appropriate clearances will be provided as described in the *Bushfire Hazard Assessment* (EIS Appendix I, see Section 3.1, Asset Protection Zones (APZs)). The APZs for the facility are between 20 m and 25 m wide (see *Bushfire Hazard Assessment* Figure 3.1).

- The management of the entire site as an inner protection zone [IPA] as outlined within section 4.1.3 and Appendix 5 of *Planning for Bush Fire Protection 2006*;

It is assumed that this requirement is incorrectly worded as the APZs are not required to be wide enough to cover the entire site. Any request that they cover the whole site would be in conflict with the method for determining APZs in *Planning for Bushfire Protection 2006*.

It is assumed the intent is that the APZ over part of the site be managed as an IPA. Section 3.1 of the *Bushfire Hazard Assessment* states that the only vegetation on the site will be a small area of landscaping at the entry and Section 3.1.1 of the *Bushfire Hazard Assessment* states that this vegetation will be managed as an IPA.

- Construction standards in accordance with section 4.3.5 of *Planning for Bush Fire Protection 2006*;

Section 4.3.5 of *Planning for Bushfire Protection 2006* does not apply as the facility is classified as 'other development'. Section 4.3.6 of *Planning for Bushfire Protection 2006* applies to other development. This section states that there are no bushfire specific performance requirements under the Building Code of Australia for this type of development. It also states that the general fire safety construction provisions are taken as acceptable solutions. Section 4 of the *Bushfire Hazard Assessment* states that the office building, which is the only proposed structure in proximity to the bushfire hazard vegetation, will be constructed in accordance with the general bushfire construction requirements in Section 3 of AS 3959 – 2009. Therefore, an acceptable solution is provided in relation to construction standards.

- A defendable space and suitable perimeter access for fire trucks between the bush fire interface;

The eastern fence of the facility (about 100 m long) will be immediately adjacent to the vegetation corridor. The corridor is about 65 m wide at this point. The fence will be 4 m high at the northern end and 10 m high at the southern end. As demonstrated in Figure 3.1 of the *Bushfire Hazard Assessment*, there will be clear space within the facility to access the eastern fence, including the APZ.

The vegetation corridor is accessible from the north from Anderson Road and from the south from Chapmans Circuit via the easement south and east of the vegetation corridor for fire fighting purposes.

- Adequate water supply and pressure

The site is within the well established Smeaton Grange industrial estate and will be supplied by mains water. It is reasonable assumption that when services were installed during the construction of the eastern end of Anderson Road in about 2007, consideration was given to sizing water pipes to ensure that they could deliver adequate water supply and pressure for fighting fires. Sydney Water was contacted on 28 October 2016 to confirm this is the case. At this stage, no response has been received.

- Suitable development of emergency and evacuation management arrangements.

An emergency and evacuation plan will be prepared for the site that will include notification of neighbours in the event of a potential emergency.

The detail and extent of the aforementioned bush fire protection measures should be appropriately considered and determined by a bush fire consultant, whilst also having regard to the aim and objectives of *Planning for Bush Fire Protection 2006*.

Further comment from RFS was provided in a letter dated 18 November 2016 in response to the information above, included in the draft RTS:

The New South Wales Rural Fire Service has assessed the Applicant's response and advises that the comment as set out in our letter dated 14 September 2016 remain applicable.

This is noted.

3.6 Camden Council

3.6.1 Council resolution

The Camden Council submission cover letter, 24 August 2016, states:

Council at its meeting of 9 August 2016 resolved to endorse this submission with the inclusion of the following additional conditions:

- No entry via Hartley Road after 10pm and access to site after 10pm to be via Camden Valley Way and Anderson Road only;
- Green waste to be contained within an enclosed facility; and
- No odorous waste to be accepted on site. Green waste is not to be stored on site for an extended length of time so as not to generate odour.

The Council's resolutions are noted. Detailed responses to the Council's submission are provided below. However, it is important to note that as a result of community consultation and the feedback received the proposed activities have been amended so no trucks will use Hartley Road after 10 pm as the facility will be closed (see Table 3.1). No odorous waste to be accepted by the facility and a range of management measures will be implemented so that vegetation waste (including green waste) will not start to compost or produce odours (see Section 3.1.2).

3.6.2 Noise

i Noise impacts

The Council's submission states:

The acoustic report indicates that nearby residents will be impacted by noise above the maximum noise criteria. The nearest potentially affected noise sensitive receivers are residences located approximately 120m south east of the site. Concerns are raised regarding the night time and morning shoulder (between 6am and 7am) operations and exceedances of the sleep disturbance criteria (i.e. background +15db(A)). The acoustic report notes that the site specific criteria for sleep disturbance is 46dB(A) and it is predicted that the residents may receive up to a 58dB(A), which exceeds the maximum noise criteria of Council Environmental Noise Policy (ENP).

The *Noise Impact Assessment* (EIS Appendix F) was conducted in accordance with the *Industrial Noise Policy* (EPA 2000), based on conservative assumptions. This included background noise monitoring and the calculation of PSNLs based on this monitoring. With one exception, the noise levels at residences will not exceed the PSNLs determined according to the *Industrial Noise Policy*. The exception is a single assessment location (R22 - which is approximately 400 m north-east of the site) where during a temperature inversion during the morning shoulder period, a minor exceedance of up to 1 dB is predicted to occur. A 1 dB difference in noise level is indiscernible to the human ear.

Project specific noise limits will be met at residences further from the site than these representative receivers because of the attenuation of noise by increasing distance and due to the intervening residences.

Background noise monitoring in Currans Hill found that noise levels of up to 80 dB, well in excess of the 58 dB predicted from the facility, are already experienced in the area before 7 am. As described in Section 3.1.1ii, sleep disturbance as a result of the operation of the facility is unlikely.

ii Camden Council's Environmental Noise Policy

The Council's submission states:

The acoustic report assesses the noise impact against the EPA's RNP [Road Noise Policy] but not Council's ENP. Council's ENP [Environmental Noise Policy] must be used.

The *Noise Impact Assessment* (EIS Appendix F) was undertaken in accordance with the *Industrial Noise Policy* (EPA 2000) and associated application notes with reference to relevant information provided in the *Road Noise Policy* (EPA 2011) as required by the SEARs.

Further comment from Council was provided on 19 November 2016 in response to the information above, also included in the draft RTS:

Council reiterates that the proposal must comply with Council's Environmental Noise Policy (ENP).

As noted above, the *Noise Impact Assessment* (EIS Appendix F) was undertaken in accordance with the relevant EPA policies as required by the SEARs.

iii Equipment required - general

The Council's submission states:

The quantity of operational plant and equipment has been underestimated in Table 6.1 of the acoustic report, in particular the number of trucks entering and delivering to the site. As such, it is considered that noise generated from the site may exceed that which is stated in the report. This would result in a further exceedance of the sleep disturbance criteria.

As described in Section 3.1.1ii, sleep disturbance as a result of the operation of the facility is unlikely. The quantity of operational plant and equipment included in the noise model is representative of a typical operational scenario based on Benedict Recycling's extensive experience operating similar facilities. Notwithstanding, if the number of trucks were to increase this would not increase the predicted level of maximum noise events, only the frequency of such events.

iv Equipment required - night time

The Council's submission states:

The EIS identifies that the site will only accept and not process waste after 10pm. It is not clear if any machinery will be used in the night time for the acceptance of waste. The identification of all machinery proposed to be used and the nominated hours of use must be provided to determine further acoustic impacts.

It is no longer proposed to accept waste after 10 pm.

v Inadequate noise assessment

The Council's submission states:

In addition to the above concerns, the acoustic report has not considered the following and therefore is unsatisfactory for the purposes of understanding the full noise impact:

- Vehicle/truck ingress and egress to the site at night time;
- The re-loading of waste materials back into the trucks;
- Noise from the tipping of waste;
- Noise generated from the beeping of reversing trucks; and
- If there is any mechanical ventilation/plant equipment for the materials recycling and processing shed.

The *Noise Impact Assessment* lists the equipment that has been assumed to be operating during each proposed period of operation. Truck operations after 10 pm are no longer proposed.

The quantitative noise model includes:

- vehicle ingress and egress;
- the sound power level of the front end loader includes loading waste into trucks; and
- noise from the tipping of waste.

There is no ventilation plant or equipment for the shed which is open on the side facing onto the site.

vi 24-hour operations

The Council's submission states:

Council objects to the acceptance of waste deliveries 24 hours per day. The proposed development notes that Council will be given 48 hours notice when waste is to be delivered between 10pm and 6am. This is not acceptable given the exceedances of the sleep disturbance criteria.

In response to community feedback, it is no longer proposed to open the facility between 10 pm and 6 am on any occasion.

3.6.3 Air quality and odour

The Council's submission states:

Council staff have significant concerns regarding the potential air quality and odour impacts from the proposed development upon residential properties in Currans Hill to the east.

It is noted that data used in the odour report for air emissions associated with the recycling facility were sourced from the US EPA which do not related to the Australian guidelines. As such, the odour report is considered to be unsatisfactory for the purposes of understanding the full odour impact of the development.

In addition to the above, it is unclear how long waste will be stored on the site before its recycling and removal. Concern is raised that waste stored on the site for an extended period of time will decompose resulting in air quality or odour impacts upon surrounding properties (particularly residential properties).

The majority of material received by the facility will be inert construction, demolition, commercial and industrial wastes. The proposed facility will not accept odour generating materials, such as putrescible wastes, and will not generate odours onsite, such as through the composting of green waste (see Section 3.1.2). Only small amounts of green waste will be stockpiled and measures will be implemented to prevent vegetation waste (including green waste) composting (see Section 3.1.2). Therefore, very little or no odour will be emitted from the facility.

However, the SEARs require "a quantitative assessment of the potential air quality, dust and odour impacts of the development", so some level of odour emission needed to be assumed to enable a quantitative assessment to be prepared.

The air quality and greenhouse gas assessment was prepared by Ramboll Environ. Ramboll Environ is one of Australia's leading specialists with extensive experience with modelling the potential impacts of industrial facilities such as the proposed facility. The assessment uses methods that are accepted by the NSW EPA and are widely applied to environmental impact assessments in NSW.

The odour assessment used odour emission estimates based on Australian operations that accept putrescible waste and/or undertake composting. It is not based on emission estimates sourced from the US EPA. As described above, these activities will not occur as part of the proposed Smeaton Grange Waste Recycling and Transfer Facility so the findings of the assessment (odour levels at residences) are highly conservative. The assessment predicted "odour concentrations well below applicable impact assessment criterion." The highest odour level predicted was 0.1 Odour Units, compared to the most sensitive NSW EPA criteria of 2.0 Odour Units which applies to urban areas. In short, even with these highly conservative assumptions, there will be no offensive odours at any residences as a result of the facility.

Effective procedures for handling of green waste has meant that Benedict Recycling has not received any odour complaints in over 30 years of operations at its facilities that except the same types of wastes as would be accepted by the Smeaton Grange Waste Recycling and Transfer Facility.

Further comment from Council was provided on 19 November 2016 in response to the information above, also included in the draft RTS:

The facility should be managed to ensure that dust and odour are controlled at all times. Green waste should be stored and contained within an enclosed facility and should not be stored on site for an extended period of time.

As noted above, green waste will be managed odours originating from green waste with details provided in Section 3.1.2. The management measures do not require green waste to be contained within an enclosed facility, a measure which may accelerate the composting process. As noted in Section 3.1.2, green waste will be monitored on a daily basis and if signs that composting is occurring are found, arrangements for removal will be made.

3.6.4 Insufficient parking

The Council's submission states:

The proposed development does not demonstrate that sufficient car parking has been provided and is unacceptable. The proposed plans only identify 7 car parking spaces on the plans. The traffic report states that a total of 12 car parking spaces will be provided. 17 spaces are required. In addition, the location of the car parking spaces within the front setback/landscaped area is not supported due to the potential conflict with heavy vehicles accessing the site and cars entering/exiting the car parking spaces.

There will be eight employees at the site at any one time (as stated in the Project Description Chapter of the main EIS, Section 2.9). The *Traffic Impact Assessment* (EIS Appendix D) states that there will be 15 employees however this includes two shifts (with one less person on the later shift) to allow calculation of total light vehicle movements. The *Traffic Impact Assessment* states that sufficient parking will be required for 15 employees and 2 visitors (see *Traffic Impact Assessment* Section 4.3). This is an error. The assessment should have considered the parking requirements for the maximum 8 employees and 2 visitors on site at any one time (ie 10 parking spaces). The site plan in EIS Appendix C incorrectly shows 7 parking spaces.

Revised site plans (Revision E, 18 August 2016) are provided in Appendix C of this RTS. These show the locations of the 8 employee and 2 visitor car parking spaces. The parking spaces are outside of the general truck travel paths and swept paths which are used for access to the bin unloading and product delivery loading areas at the site.

There will be no requirement for street-side (cul-de-sac) parking by employees.

There will be no parking within the front setback/landscaped area.

3.6.5 Other matters

i Staff numbers

The Council's submission states:

Number of staff – discrepancies between the number of employees identified within the EIS (8) and the number identified within the traffic report (15).

This matter is addressed in Section 3.6.4.

ii Bushfire assessment

The Council's submission states:

Bushfire assessment – a bushfire hazard assessment was prepared for the proposal by EMM who do not appear to be accredited by the Fire Protection Association

The bushfire assessment was prepared by Mark Roberts. Mark has a Post-graduate Diploma in Planning for Bushfire and has prepared bushfire hazard assessments for a range of similar sites in NSW, many of which have been assessed and approved by the Rural Fire Service.

This matter was not raised by the NSW RFS (see Section 3.5).

iii Architectural plans

The Council's submission states:

Architectural plans – it is not clear if the proposed development fully complies with the 11 m maximum building height development standard that applies to the site

Revised site plans (Revision E, 18 August 2016) are provided in Appendix C. These plans provide all levels. The maximum height of the roof line will be 11 m or less from ground level. This could be specifically conditioned to give all stakeholders additional assurance that this height limit will not be exceeded.

iv Landscaping plans

The Council's submission states:

Landscaping plans – a detailed landscaping plan has not been provided which demonstrates the proposed landscaping, volume and maturity height

A landscaping plan was provided as part of the Draft RTS. Further comment from Council was provided on 19 November 2016 in response:

Landscaping plans - A landscape plan has been submitted. The landscape plan is deficient of the following information:

- The number of upper canopy trees should be increased from 4 to 8. The four additional trees can be *Eucalyptus tereticornis* (Forest Red Gum) or *Corymbia maculata* (Spotted Gum). Upper canopy trees minimum container size 45lts;
- Mid story shrubs (2 - 4m mature height) planted at 2 metre centres is required. Plant selection is to consist of two or more native species e.g. *Callistemon*, *Grevillea*, *Hakea*, *Leptospermum*, and *Melaleuca*. Shrubs minimum container size should be 5lts;
- The proposed groundcover species is acceptable; however, the grid is required to be reduced from 1.0m to 0.5m. Grow tube or similar size container;
- A detailed landscape plan should be prepared to include details consistent with D4.3.1(g) of Camden Council's DCP 2011, including detail on proposed planting specification, garden edge treatment, staking, irrigation, soil cultivation and improvement, mulch and establishment maintenance regime; and,
- The plan should also include reference to protection of existing Street trees to be protected during construction in accordance with AS 4970 Protection of Trees on Development Sites.

An amended landscaping plan is provided in Appendix D, addressing Council's comments. The landscape plan has been updated to reflect Council's request for additional trees and mid story shrubs and meets the requirements of D4.3.1(g) of Camden Council's DCP 2011. Further details will be prepared for submission at the construction certificate stage, including compliance with AS 4970 Protection of Tree of Development Sites.

It is noted that the amended landscaping plan has been updated to allow for a wider driveway than that shown in Figure 1.2 and Appendix C. The wider driveway is required to facilitate access as demonstrated in the swept path diagram at Appendix F, described below in Section 3.6.5v.

Should this approach be acceptable, the site plans presented in Appendix C will be updated as part of the construction certificate stage to reflect the increased driveway width.

v On-site vehicle manoeuvrability

The Council's submission states:

Manoeuvrability – the proposed plans do not demonstrate that all vehicles can enter and exit the site in a forward direction and are unacceptable. The proposed plans do not demonstrate the swept paths of the largest vehicle that will utilise the site.

All vehicles will be able to enter and exit the site while travelling forwards at all times.

A swept path diagram for a 19 m long articulated truck is provided in the *Truck Turning Paths, 52 Anderson Road, Smeaton Grange*, prepared by Varga Traffic Planning, Appendix C of EIS Appendix D. This swept path diagram is applicable for a semi trailer or truck and dog trailer travelling to and from the truck loading bay which is located in the south-western corner of the site. Additional swept path diagrams have been provided in RTS Appendix F for 19 m long articulate trucks (applicable to semi-trailers and truck and dog trailers), reversing to the shed. The diagrams demonstrate how these vehicles (and smaller trucks) will be able to enter and exit the site, as well as approach the bays and reverse into the receivable and processing areas.

Swept path diagrams (prepared by Varga Traffic Planning) for the largest vehicle that will enter the facility, a 25 m long B-Double truck, are provided in Appendix F. Some materials will be dispatched from the facility by B-Double trucks. No waste will be delivered by B-Double trucks. Side loading will be employed for B-Double trucks and reversing will not be necessary. The swept path diagram shows the B-Double truck approaches to the shed and bays for loading and how B-Double trucks will leave the site.

The other truck waste deliveries will normally be via rigid trucks which are up to 10 m long. These deliveries will normally be to the north-western corner of the site, and will include reversing to the bin unloading area. The truck travel paths for these types of trucks will be within those required for 19 m long trucks as shown in Appendix F.

Vehicles moving within the site will be directed by a traffic controller.

Generally, light vehicles will only be able to stop in the hand unloading area and parking spots (see Figure 3.1). Drivers and passengers will be able to safely exit their vehicles in these areas. If there is a 'surge' in light vehicle numbers at the facility at any time (see Section 3.6.5vi), drivers will be instructed by the traffic controller to wait in their vehicles in the light vehicle stacking area (see Figure 3.1). Drivers and passengers will be instructed to remain within their vehicles in this stacking area. Heavy vehicles will be directed around the light vehicle stacking area when it is occupied.

vi Traffic management

The Council's submission states:

Traffic management – Council does not permit the stopping or parking of vehicles on Anderson Road. The proposal does not indicate how waste vehicles attending the site will be managed to ensure that trucks do not attend the site outside of the approved operating hours and to ensure that vehicles do not queue within the cul-de-sac

The facility incorporates two weighbridges for incoming vehicles to allow vehicles to enter the site quickly, without the need for queuing within the cul-de-sac. The weighbridge will be operated in the same manner as the weighbridge at Benedict Recycling's Chipping Norton Recycling Facility. While on the weighbridge, the vehicle registration is recorded, the vehicle mass is recorded, and an initial inspection of the waste is made either from the weighbridge office directly or using a camera mounted overhead for larger vehicles. The vehicle is then directed to the appropriate tip-off point where the load is inspected in detail.

The vehicle takes less than a minute on the weighbridge before entering the site. A camera and number plate recognition software is used so that vehicles that have used the facility before are automatically recorded, further reducing the time required on the weighbridge.



Stacking capacity within the site
 Smeaton Grange Benedict Industries
 Response to Submissions
 Figure 3.1

There will be approximately 68 waste deliveries by light vehicles, 36 waste deliveries by heavy vehicles and 17 recycled product or residue dispatches each day (see *Traffic Impact Assessment* Table 3.1). As described in Table 3.1, the facility would normally operate from 6 am to 4 pm Monday to Saturday. Assuming an even distribution over 10 hours, this is an average of about 6.8 deliveries by light vehicle and 5.3 deliveries by heavy vehicles each hour. This represents one vehicle arriving at the site every five minutes. As there will be two weighbridges for incoming vehicles, about one vehicle will be able to enter the site each minute. Therefore, there will be sufficient weighbridge capacity for vehicles to enter the site at about five times the average demand.

Vehicles are typically processed on the site in 10–15 minutes. With an average of one incoming vehicle every five minutes there will be typically be two to three vehicles (a mix of light and heavy vehicles) on site delivering waste on site at a time. There may also be a large truck dispatching products and residue. However, trucks dispatching materials will be scheduled for times when there are less deliveries.

There is room within the site for five light vehicles and eight heavy vehicles (ie a total of 13 vehicles) to be stacked within the site awaiting unloading (Figure 3.1).

There is ample weighbridge capacity and vehicle storage capacity within the site to avoid the need for vehicles to queue in the cul-de-sac or on Anderson Road, even should there be a 'surge' of five times the average rate of vehicles arriving at the site. In the event of a surge, staff will be reprioritised from other duties to process incoming trucks. With these measures in place, it is predicted that there will be no vehicle queuing in the cul-de-sac and the efficiency of the road network at the eastern end of Anderson Road will be maintained.

The gates will be shut outside of operating hours to prevent trucks accessing the facility.

Trucks accessing the facility will be subject to exactly the same Council rules that apply to trucks accessing other businesses in the industrial area.

vii Bin storage and truck parking

The Council's submission states:

Bin storage and truck parking – the out of hours bin storage and waste truck parking area has not been identified on the proposed plans

Empty skip bins will be stored in a designated area west of the outgoing weighbridge (see Figure 1.2).

viii Signage

The Council's submission states:

Signage – the EIS identifies that the proposed development will include a sign at the entrance to the site on Anderson Road. The site plan also demonstrates a pylon sign at the front of the site. No further detail of the signage has been provided such as an elevation plan of the sign to demonstrate the height, width, colour and content of the proposed signage.

The draft RTS stated that further details regarding signage would be provided at the construction certificate stage. Further comment from Council was provided on 19 November 2016 in response:

Signage – details of signage should be provided at the DA stage and not the CC stage.

In order to address Council’s concerns, additional detail for the business identification signage in the front of the facility has been provided below, along with an assessment against the provisions of State Environmental Planning Policy No 64 – Advertising and Signage (SEPP 64) (Table 3.3)

The example signs shown in Photograph 3.1 will form the basis for the proposed sign in the front of the facility. The colours of the proposed sign will be the same as shown in Photograph 1. The sign will be of the same materials (ie painted metal sign with painted metal supports).

The plans included in the EIS show the position and size of the sign, although it may be moved about 2 m to the east so that it is further from the driveway. The sign will not exceed the height of the decorative masonry fence. The sign will be illuminated by localised lights so that it can be read when natural light levels are low. It will be turned off outside of the site’s operating hours.

The proposed sign will be limited to the business identification signage definition within SEPP 64. As such, it will comply with the relevant requirements of SEPP 64 Clause 3(1)(a) (Table 3.3) and Schedule 1. Additional signage details will be addressed at the construction certificate stage.



Photograph 3.1 Example signs – Benedict Recycling, 1a McIntosh Drive

Table 3.3 SEPP 64 Clause 3(a)(1) Assessment

Assessment Criteria Clause 3 Aims and objectives etc	Compliance	Comments
(a) to ensure that signage (including advertising): (i) is compatible with the desired amenity and visual character of an area, and	Yes	Business identification signs are common in the Smeaton Grange industrial area. They generally have simple in construction and content. The proposed signage is compatible with the level of amenity and the visual character of the area.
(ii) provides effective communication in suitable locations, and	Yes	The proposed signage will be simple, communicating the name of the business, opening hours and telephone contact as in the example signage (Photograph 1).
(iii) is of high quality design and finish, and	Yes	The proposed signage will be of high quality design and finish. The applicant has a history of maintaining these qualities in existing signage (Photograph 1).

Schedule 1 Assessment criteria

Character of the area

Is the proposal compatible with the existing or desired future character of the area or locality in which it is proposed to be located?

Is the proposal consistent with a particular theme for outdoor advertising in the area or locality?

The sign will be of a simple design compatible with the proposed facility and the character of the Smeaton Grange industrial area. The sign will be of high quality and will align with the aesthetic of the visible portions of the facility and of nearby businesses.

Special areas

Does the proposal detract from the amenity or visual quality of any environmentally sensitive areas, heritage areas, natural or other conservation areas, open space areas, waterways, rural landscapes or residential areas?

The proposed sign will be visible from the edge of the vegetated area around Kerry Creek to the east of the site. However, the proposed signage will not detract from the amenity or visual quality of the area and will be well integrated into the street facing portion of the facility.

Views and vistas

Does the proposal obscure or compromise important views?

Does the proposal dominate the skyline and reduce the quality of vistas?

Does the proposal respect the viewing rights of other advertisers?

The proposed sign will not obscure or compromise important views or interfere with the skyline, quality of vistas or viewing rights of advertising on neighbouring land. The viewing rights of existing and future advertisers will be respected.

Streetscape, setting or landscape

Is the scale, proportion and form of the proposal appropriate for the streetscape, setting or landscape?

Does the proposal contribute to the visual interest of the streetscape, setting or landscape?

Does the proposal reduce clutter by rationalising and simplifying existing advertising?

Does the proposal screen unsightliness?

Does the proposal protrude above buildings, structures or tree canopies in the area or locality?

Does the proposal require ongoing vegetation management?

The proposed sign will be appropriate in scale, proportion and form with the industrial character of Smeaton Grange. It will be of a high quality and will contribute to the visual amenity of the local area and visible portion of the facility without producing visual clutter.

The proposed sign will not protrude above buildings, structures and vegetation. It will be placed so that ongoing vegetation management will not be required.

Site and building

Is the proposal compatible with the scale, proportion and other characteristics of the site or building, or both, on which the proposed signage is to be located?

Does the proposal respect important features of the site or building, or both?

Does the proposal show innovation and imagination in its relationship to the site or building, or both?

The proposed sign will be compatible with the scale, proportion and character of the site and exterior wall. It will respect, complement and not dominate the visible portions of the Project.

Associated devices and logos with advertisements and advertising structures

Have any safety devices, platforms, lighting devices or logos been designed as an integral part of the signage or structure on which it is to be displayed?

The proposed sign will be nature not requiring moving parts, safety devices platforms or lighting as part of the structure of the signage. Logos have not been incorporated as an integral structural part of the signage.

Illumination

Would illumination result in unacceptable glare?

Would illumination affect safety for pedestrians, vehicles or aircraft?

Would illumination detract from the amenity of any residence or other form of accommodation?

Can the intensity of the illumination be adjusted, if necessary?

Is the illumination subject to a curfew?

Illumination of the proposed sign will consist of localised lights that will be positioned so there is not unacceptable glare. It will not affect the safety of pedestrians, vehicles or aircraft. Illumination will not be visible from any residence or accommodation. It will be turned off outside of the site's operating hours.

Safety

Would the proposal reduce the safety for any public road?

Would the proposal reduce the safety for pedestrians or bicyclists?

Would the proposal reduce the safety for pedestrians, particularly children, by obscuring sightlines from public areas?

The proposed signage will not impact the visibility or manoeuvrability of motorists, pedestrians or bicyclists to or from public areas.

ix Aboriginal heritage

The Council's submission states:

Aboriginal heritage – Aboriginal heritage has not been addressed which is included within the SEARs information to be included in the EIS

The site was previously an agricultural property. It has been subdivided, levelled and compacted for industrial development. The SEARs do not require Aboriginal heritage to be assessed.

x Waste management

The Council's submission states:

Waste management – insufficient information has been provided on how noise and dust will be managed during the processing and stockpiling of waste outside of the shed

Materials (waste, recycled products and residues) will be managed as follows:

- materials (waste, products and residues) will be stockpiled in the shed or in a marked bay (see Table 1.2); and
- wastes will be processed in the shed or within the screening plant area (see Figure 3.3) and will not be processed outside of these areas.

Details of dust management measures, are provided in EIS Section 6.2.1 and EIS Appendix E Chapter 10. These measures are included in the statement of commitments in EIS Chapter 7 and have been updated in RTS Chapter 5. The measures will include the use of water sprays at stockpiles, operational areas and the screening plant during material handling. The measures proposed are appropriate given the low levels of dust generation from the site.

Details of noise management measures are provided in EIS Section 6.4.2 and EIS Appendix E Chapter 9. These measures are included in the statement of commitments in EIS Chapter 7 and RTS Chapter 5. These will include:

- closing the site between 10 pm and 6 am (see Section 3.1.1);
- choosing quieter plant and equipment, including installing best-practice noise suppression equipment, based on the optimal power and size to most efficiently perform the required tasks;
- plant with high noise emissions will generally be located inside the shed or will be under cover;
- plant and equipment will be regularly maintained and serviced;
- low-frequency reversing alarms ("growlers") will be used rather than the standard high frequency beepers;
- the site layout has been adopted that minimises the need for mobile plant to reverse;
- plant and equipment will be switched off when not in use;
- any vehicle queuing will be on site rather than on public roads;

- material drop heights will be minimised and dragging materials along the ground will be minimised;
- site contact details will be provided on a board at the front of the site;
- any noise-related complaints will be handled promptly; and
- a complaints register will be maintained.

These are standard practices and are widely implemented. They include minimising material drop heights to:

- minimise noise emissions;
- maximise (fuel and time) efficiency by not lifting loads any higher than required;
- reduce wear and prevent damage to site surfaces that requires costly repair; and
- prevent damage to vehicle trays by lowering the load as far as possible before releasing or tipping - truck drivers are generally quick to highlight when drop heights are not minimised.

Similarly, it is inefficient to drag materials along the ground rather than lifting them and quickly damages the site surface leading to costly repairs.

xi Salinity

The Council's submission states:

Salinity – the EIS does not consider saline soils.

Salinity is addressed in EIS Appendix G Section 4.5.

Further comment from Council was provided on 19 November 2016 in response to the information above, also included in the draft RTS:

A salinity investigation still remains outstanding. It was mentioned in the Water management plan that Council's Strategy in the Growth Centres DCP will be adopted. Smeaton Grange does not fall within any of the NSW Growth Centres Precincts. Salinity should be investigated in accordance with the guideline for Salinity investigation for urban salinity. Alternatively, the salinity report undertaken for the parent subdivision which created the subject land should be updated to include the updated Australian Standards.

The *Salinity Potential Map* noted in EIS Appendix G Section 4.5 shows the facility is located on land with a 'Moderate Low Salinity Potential', with no evidence of soil salinity on the site. While the facility is not within the land to which Camden's Growth Centres DCP applies, the Camden Growth Centres DCP Salinity Management Strategy provides clear mitigation measures that are suitable for the site.

The Council's submission states:

The EIS notes that vehicles delivering waste to the site will be inspected for potential contaminants and classified thereby potentially allowing contaminants into the site. All vehicles making deliveries to the site must be inspected and classed as contaminant free prior to delivering any waste to the site. No contaminated material must be brought onto the site at any time.

Customers are obliged to check loads for contamination before attempting to deliver them to a licensed waste facility.

The EIS Section 2.3.4 describes the inspection of incoming waste. 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 of the EIS) will be rejected, reloaded (if it has been tipped) and the customer will be required to take the contaminated load out of the waste recycling and transfer facility immediately.

These inspections will occur on every single load and will occur within the waste facility as it is obviously inappropriate to conduct these checks on Council roads outside of the site.

As described in EIS Section 2.3.4, information on rejected loads (date, time, vehicle registration number and customer name) is entered into a register that is available for EPA inspection. EPA can follow-up regarding these rejected loads.

Benedict Recycling takes its responsibilities to the protection of its workforce very seriously, including preventing workers from being exposed to contaminated waste (including asbestos). It is also in Benedict Recycling's commercial interest that no contaminated waste is accepted onto the site that Benedict Recycling will then need to pay the high rates charged for it be removed and disposed in a facility licensed to accept contaminated material. The waste inspections measures therefore protect Benedict Recycling as well as their neighbours.

As it does at its other facilities, Benedict Recycling will charge a re-loading fee to customers that tip waste that is found to contain any materials that the facility is not licensed to accept (eg putrescibles, hazardous, liquid and odorous waste). Benedict Recycling has found that customers who have a number of loads rejected and have to pay the re-loading fee, as a result of their rigorous inspection regime, stop using Benedict Recycling's facilities.

Further information on asbestos is provided in Section 4.8.2.

Further comment from Council was provided on 19 November 2016 in response to the information above, also included in the draft RTS:

Council reiterates its position that, no contaminated material must be brought onto the site at any time. All vehicles making deliveries to the site must be inspected and classed as contaminant free prior to delivering any waste to the site.

As noted above, Benedict Recycling will make every effort to ensure that customers do not bring contaminated waste onto the site, including a preliminary inspection at time of entry. Penalties for non-compliance by customers will also mitigate the risk. However, the measures noted above are prudent contingency strategies that ensure that if contaminated waste is brought on site and unloaded, it will be promptly removed.

3.6.6 Fencing

The Council's submission states:

In accordance with Section D4.2.5 of the Camden DCP, the maximum fencing height within the Smeaton Grange Industrial Estate is 2.1 m. The proposed fencing (up to 10 m high) is inconsistent with other industrial development within Smeaton Grange and will result in negative visual impacts. The proposed fencing is therefore not supported.

Council does not support the front fence (2.1 m high metal palisade fence with automatic colourbond gates) and recommends a decorative masonry fence to screen the proposed use from the street. The use of colourbond gates at the vehicle access points is not supported.

The site's fencing, which will vary between 2.1 m and 10 m tall will provide acoustic screening, minimising noise levels in surrounding areas. As described in EIS Section 6.9 and illustrated in the two photomontages, the proposed fencing is consistent with the heights, materials and colours of existing industrial buildings walls within the Smeaton Grange Industrial area and will not result in negative visual impacts.

The Council's submission regarding the front fence contradicts the Council's previous advice to CD Architects regarding the site (28 April 2016), that states "[t]he front fence shall be amended to comprise of a 2.1m high decorative metal (i.e. palisade fence) or a combination of decorative metal and masonry." The proposal was amended to include the palisade fence to address this Council request.

In the draft RTS, Benedict Recycling committed to building a palisade fence with automatic palisade gates in accordance with the DCP and to match the local character of the industrial area. In its response to the draft RTS, Council provided the following comment in its submission of 19 December 2016:

Council's correspondence to CD Architects regarding the front fencing on 28 April 2016 was for a DA for an industrial building (with no proposed use or associated ancillary structures) on the subject site, and was entirely unrelated to the application for the waste transfer facility currently being assessed by the Department. The purpose of the decorative masonry fence to the front of the property is to effectively screen the proposed use from the street. Council maintains the position that the proposed metal palisade fence with an automatic Colorbond gate for ingress and egress is not supported. A decorative masonry fence to effectively screen the proposed use should be provided as part of the proposal.

EMM spoke with Stephen Pratt of Camden Council on 5 January 2017 seeking clarification on this comment. Mr Pratt agreed that Council's primary concern regarding the front fence was visual screening and that the sentence 'Council maintains the position that the proposed metal palisade fence with an automatic Colorbond gate for ingress and egress in not support' as that the metal palisade fence was not supported, not that the Colorbond gate was not supported. Mr Pratt confirmed that the gate should be Colorbond or other metal type so as to form an effected visual screen.

As such, Benedict Recycling will build a combination decorative metal and masonry fence in accordance with *Camden Council Development Control Plan 2011 D4.2.5 Fencing*:

5. A combination decorative metal and masonry fence with a landscape screening buffer planted in front must comply with the following;
 - (a) the ratio of the masonry component to decorative metal component must fall within the range of between 1 part masonry to 6.5 – 7 parts metal panels.
 - (b) the metal panels must not exceed 3 metres in length nor be less than 1.8 metres in length.
 - (c) any masonry plinth established along the bottom of the fence must be not more than 600 mm high.

3.6.7 Public interest

Five submissions from the public were received by the Council. Matters raised in the public submissions sent to the Council are addressed in Chapter 4.

4 Community submissions

This chapter provides responses to the matters raised by individuals (including those who only made a submission to Council), non-government organisations, and to the matters listed under “Public Interest” in the Council submission (see Section 3.6.7).

The issues raised in the submissions were also noted in Council’s letter dated 19 November 2016.

The prevalence of each matter is shown in Figure 4.1. Responses are provided in this chapter grouped into broad themes, eg noise and air quality. The themes are generally addressed in order based on the number of submissions that raise the matters within the theme.

4.1 Noise

There were 101 submissions that raised noise levels as a result of the facility, particularly at night.

Noise levels from construction and operation of the facility were quantitatively assessed in the *Noise Impact Assessment* (EIS Appendix F). Noise impacts from the facility and proposed noise management measures are further discussed in Sections 3.1.1 and 3.6.5x of this RTS.

4.1.1 Background noise monitoring

In the Council submission, under the heading “Public Interest”, the Council summaries the submissions that it received directly, stating:

Concerns are raised that the noise impact assessment confirmed that the 22 nearest residential receivers would be affected by the proposal. The residents would also like to be more involved in the placement locations of noise receptors as there are concerns that the noise readings have not been monitored accurately.

The noise assessment locations represent those most likely to be affected by the facility. The nearest potentially affected noise sensitive receivers are residences located approximately 120 m south-east of the site. Adherence with noise criteria at the assessment locations indicates that noise criteria will be met at other surrounding noise sensitive locations. Representative assessment locations considered in the noise assessment are shown in *Noise Impact Assessment* Figure 4.1.

Long-term noise monitoring was completed by EMM in Currans Hill from 10 to 21 December 2015 as detailed in *Noise Impact Assessment* Table 4.1. The long-term monitoring was complete using a calibrated ARL EL 316 Type 1 environmental noise logger (s/n_16_306_036).

The background noise monitoring was completed accordance with the *Industrial Noise Policy* at a location that is representative of the receiving noise environment.

4.1.2 Validation monitoring

One submission requested that the project approval conditions should require the proponent to “carry out verification testing in respect of noise at a period of 6 and 12 months from the commencement of operation to ensure compliance with the NSW EPA Industrial Noise Criteria”.

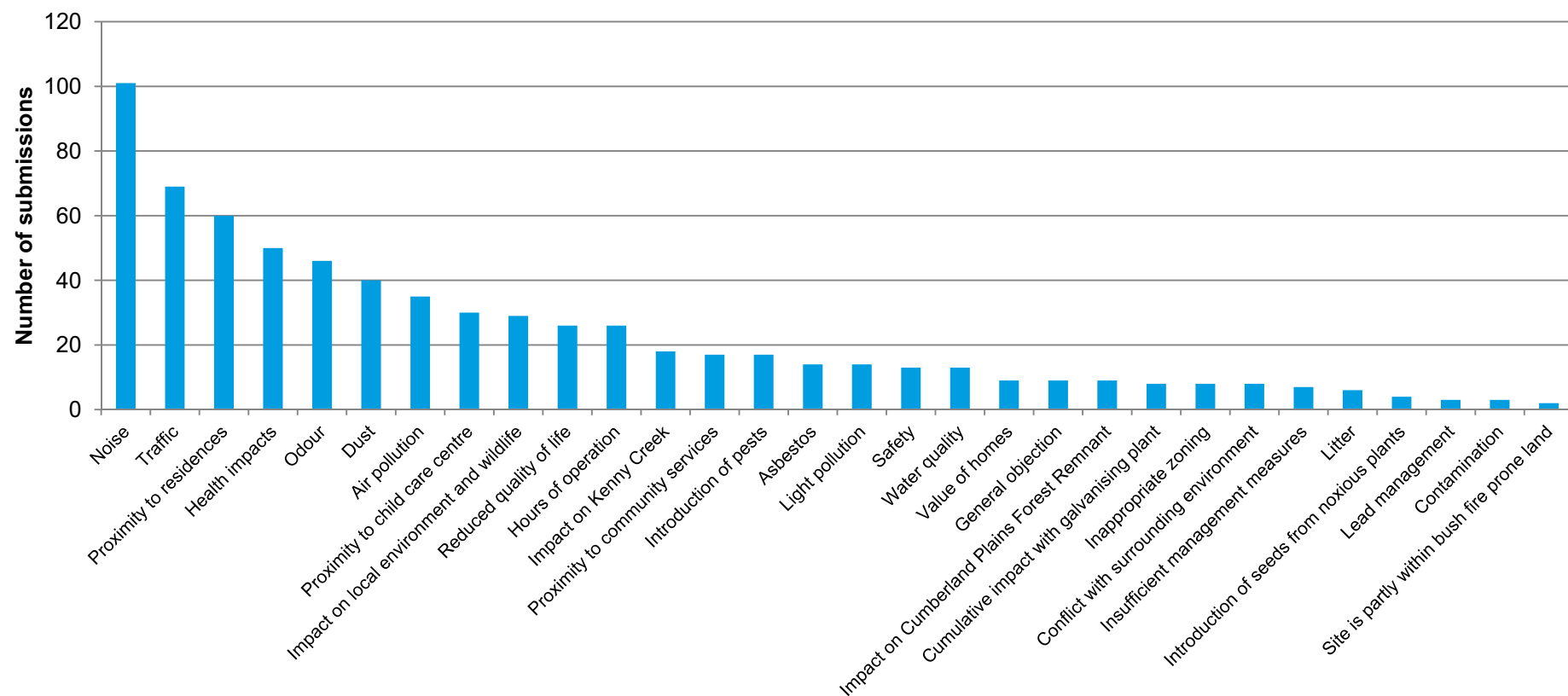


Figure 4.1 Prevalence of matters raised in community submissions

Benedict Recycling will commission noise verification monitoring at the closest residences to the south-east (R9) and to the north-east (R22) (or at equivalent locations) within 3, 6 and 12 months of the start of operations to confirm (or otherwise) the accuracy of the conservatively assessed noise predictions and the site's Environment Protection Licence.

4.2 Traffic and transport

4.2.1 Traffic increases

There were 69 submissions that discussed increased traffic as a result of the facility.

i Street impacts

No trucks will be travelling to or from the facility using residential streets.

The construction traffic will be similar to that for neighbouring properties that have been recently developed. The number of vehicles accessing the site daily during construction will be small. Over the construction period (about three weeks), up to 50 trucks will deliver the main shed, weighbridges, portable offices, fencing and asphalt or concrete to seal the site. There will be a maximum of 10 trucks delivering material on any given day. There will be up to 30 light vehicle movements daily carrying construction personnel to and from the site. These vehicle volumes are well within the volume of traffic predicted to be generated during operations, so as for operational traffic, there is not expected to be any material impact on the road network as a result of construction traffic.

Once operational, the majority of vehicles will be travelling to and from Camden Valley Way via Anderson Road. Benedict Recycling will erect signs at the facility requesting customers access the facility, travelling via these two roads (see Table 5.1).

The facility will generate both light and heavy vehicle traffic. Traffic generation, including the proportions of light and heavy vehicle movements and the predicted overall and peak hour traffic generation, is described in detail in Section 3.2 and Table 3.2 of the *Traffic Impact Assessment*. Traffic movements outside of peak hours will be more uniformly distributed over the full working day with approximately 25 traffic movements (15 light vehicle and 11 heavy vehicle) expected per hour between the normal operating hours of 6 am and 4 pm (see Section 3.1.1). From 4 pm to 10 pm, and particularly after 6 pm, waste deliveries will generally be from selected projects that have consent to undertake activities outside of normal construction hours. Anticipated site generated hourly traffic movements are summarised in Table 4.1.

Table 4.1 Site generated traffic movements

Time	All site hourly traffic movements		
	Cars/other light vehicles	Trucks	Total
Morning peak hour (8.00 am to 9.00 am) ¹	31	12	43
Afternoon peak hour (3.30 pm to 4.30 pm) ¹	23	6	29
Non-peak hour (6.00 am to 8.00 am and 9.00 am to 3.30 pm) ¹	15	11	26
Late afternoon (4.30 pm to 6.00 pm) ²	17 ³	6	23
Evening (6.00 pm to 10.00 pm) ³	7 ³	6	13

Source: Traffic Impact Assessment Table 3.2.

Notes: 1. Long-term average.

2. Waste deliveries from selected projects and dispatch that will occur on occasions through the year (including a shift change that will occur sometime between 4.30 pm and 6.00 pm depending on project demand).

3. Waste deliveries from selected projects and dispatch that will occur on occasions through the year (including a shift going home that will occur sometime between 6.00 pm and 10.00 pm depending on project demand).

The geographic distribution of vehicle movements between the two main approach routes, from either Camden Valley Way or Narellan Road, are described in Section 3.3 of the *Traffic Impact Assessment*. These are average distributions which will vary to some degree over weeks and months of a typical year as the sources of wastes vary.

While some vehicles will be travelling along Narellan Road via Anderson Road, Anzac Avenue and Hartley Road, there will be no facility traffic on Hartley Road between 10 pm and 6 am because the facility will be closed. The predicted increases in the traffic volumes using local roads are assessed in the *Traffic Impact Assessment* (EIS Appendix D) Table 4.1. This predicts the following traffic increases for all traffic using local roads as a result of the facility:

- Anderson Road (east of Camden Valley Way): 1.1%
- Hartley Road (north of Narellan Road): 0.5%

These increases have been calculated by dividing the predicted traffic volume from the facility by the total traffic volume. Where the existing traffic volume is higher, the percentage contribution from the facility will decrease. Given that the facility would only contribute 0.5% (or less) to the traffic on Hartley Road, it will not have a material impact on the access by emergency vehicles.

ii Intersection Impacts

The intersection traffic surveys and the SIDRA analysis were undertaken in December 2015, after the recent capacity upgrades to Camden Valley Way (four lanes) and Narellan Road (six lanes). The findings in the *Traffic Impact Assessment* (EIS Appendix D) are based on those results and reflect the current traffic capacity of these intersections. As demonstrated within *Traffic Impact Assessment* (EIS Appendix D), traffic impacts for traffic using these routes are minimal, as discussed in the sections below.

The Camden Valley Way upgrades were completed in three stages, which were opened progressively over the period from October 2014 to December 2015. At the time of the traffic survey, these works were substantially complete to the extent that the traffic using the route in the Narellan area would be at the levels at completion. Capacity upgrades since this time have focused on improving local traffic flow. This will have decreased the proportional impact of the facility on the local traffic network. As such, an updated SIDRA analysis would not provide materially different results.

The *Traffic Impact Assessment* (EIS Appendix D) found that the level of service during peak hours is generally close to capacity (level of service D or E) for the intersections of Camden Valley Way with Anderson Roads and Narellan Road with Hartley Roads.

The SIDRA modelling results are presented in Appendix A of the *Traffic Impact Assessment* (EIS Appendix D). Due to the high rate of recent residential development in the nearby Camden and Narellan urban areas over the past 5–10 years there has been significant corresponding growth in the peak hourly traffic demand generated by these areas. The road upgrades have been completed and the locality peak hour traffic movement patterns have rapidly adjusted, responding to the increased peak hour traffic capacity which is now available on these routes.

Further information on the subject intersections is provided in the sections below.

a. Camden Valley Way and Anderson Road intersection

The existing Camden Valley Way and Anderson Road intersection traffic movements are 3,327 in the morning peak hour and 3,527 in the afternoon peak hour. According to the SIDRA analysis, the intersection is operating at apparent degree of saturation 0.83 and 0.98 in each peak hour respectively.

At the Camden Valley Way intersection, there are a total of 17 approach lanes distributed over the four approaches to the intersection which indicates that the total intersection capacity should be approximately 7,500 vehicles per hour in the peak hours. The predicted intersection traffic movements including the facility traffic would be 3,355 in the morning peak hour and 3,548 in the afternoon peak hour.

The SIDRA results for an intersection controlled by traffic signals can sometimes be misleading as the program reports the degree of saturation for the worst affected movement and this may not be an accurate reflection of the overall average degree of saturation for all the movements at the intersection. This is because the program 'rations' (sometimes inaccurately) the green time for each movement at the intersection to give the lowest overall average intersection delay. This can result in some minor traffic movements at the intersection having a high degree of saturation which is not reflective of the overall intersection operations.

Another explanation is that the intersection (as modelled) has no filter turn phases. Because of the high proportion of right turning traffic from the minor roads at the intersection, the separate major road and minor road dedicated right turn intersection phases take up a disproportionate amount of the overall intersection capacity, such that the high traffic capacity provided by the multiple lanes on the major road route via Camden Valley Way can only effectively be used for 50% or less of the overall intersection cycle time.

The facility is anticipated to result in an increase of approximately 28 movements per hour in the morning and 21 per hour in the afternoon, a traffic volume increase of 0.8% and 0.6%, respectively. Regardless of the limitations of the SIDRA analysis in modelling, this increase will not have a material impact on the operation of the Camden Valley Way and Anderson Road intersection.

b. Hartley Road and Narellan Road intersection

It is correct that the Hartley Road/Narellan Road intersection is operating at near capacity during the peak hours. The existing Hartley Road and Narellan Road intersection traffic movements are 5,834 in the morning peak hour and 7,006 in the afternoon peak hour. According to the SIDRA analysis, the intersection is operating at apparent degree of saturation 0.97 and 1.00 in each peak hour respectively.

These existing intersection traffic volumes are closer to the expected total intersection capacity which should be approximately 7,500 to 8,000 vehicles per hour in the peak hours. The predicted future intersection traffic movements including the facility traffic would be 5,852 in the morning peak hour and 7,018 in the afternoon peak hour.

The facility is anticipated to result in an increase of approximately 18 movements per hour in the morning and 12 per hour in the afternoon, a traffic volume increase of 0.3% and 0.2%, respectively. This will not have a material impact on the operation of the Narellan Road and Hartley Road intersection.

The proposed operation of this intersection is assessed in the *Traffic Impact Assessment* Table 4.3. The facility will only increase the morning peak average vehicle delay by 0.8% from 60.8 seconds to 61.3 seconds and the afternoon peak average vehicle delay by 0.1% from 60.5 seconds to 60.6 seconds. Again, this will not have a material impact on emergency vehicles.

4.2.2 Road safety

Existing road safety and accident history is described in *Traffic Impact Assessment* Section 2.5. The potential impact of the facility on road safety and traffic management is described in *Traffic Impact Assessment* Section 4.4 which found:

The project will generate approximately 276 additional daily traffic movements, including 106 additional daily truck movements each day in the Smeaton Grange area. There are already high volumes of daily truck traffic operating on the major roads and industrial roads in the area, including Narellan Road, Camden Valley Way, Anderson Road and Hartley Road.

These roads have all been adequately constructed to accommodate heavy vehicle traffic and there would be no additional operational or traffic safety concerns for these roads as a result of the proposed additional truck traffic movements generated by the recycling facility.

This applies to all the roads which are used to access the site at Smeaton Grange, including the roads closer to the facility site, near the child care centre and recreational centre which is near the corner of Anderson Road and Anzac Parade. The existing traffic volumes and the effects of the traffic generated by the facility at this location are discussed further in Section 4.5.3.

4.3 Air quality

4.3.1 Odour

There were 46 submissions that raised concerns regarding odour, including comparisons to Spring Farm Resource Recovery Centre and Kimbriki Resource Recovery Centre.

An odour assessment is provided in the *Air Quality and Greenhouse Gas Assessment* (EIS Appendix E) and further details are provided in Sections 3.1.2 and 3.6.3 of this RTS.

It is understood that residents' concerns regarding odour from the facility are based on the odours emitted by Spring Farm Advanced Resource Recovery Facility and Kimbriki Resource Recovery Centre, in other locations in Sydney. The waste accepted and processing of this waste at those two operations is very different from those proposed to be accepted by the Smeaton Grange Waste Recycling and Transfer Facility.

It is important to understand the types of general solid waste (ie not special, liquid or hazardous waste):

- Putrescible: solid waste that contains organic matter capable of being decomposed by microorganisms. As putrescible wastes decay and are processed they produce odours, as does composting.
- Non-putrescible: waste that does not readily decay under standard conditions; emit offensive odours; or attract vermin or other vectors (such as flies, birds and rodents).

The Smeaton Grange Waste Recycling and Transfer Facility will only accept non-putrescible waste (see Section 3.1.2), will not be deliberately composting any vegetation and will implement measures to prevent vegetation waste from starting to compost (see Section 3.1.2). The facility will not accept council kerbside green bin waste or putrescibles waste.

In contrast, the Spring Farm Advanced Resource Recovery Facility accepts general solid waste (putrescible) and garden organics and until late 2015 these waste were being landfilled on site. Now these wastes are received and processed by composting and anaerobic digestion which can create odour. Kimbriki Resource Recovery Centre does not accept putrescible waste, but it does accept vegetation that it composts to produce a range of products.

As such, very little or no odour will be emitted from the Smeaton Grange Waste Recycling and Transfer Facility.

4.3.2 Dust

There were 40 submissions that raised the adequacy of the air quality assessment, management measures, impacts and monitoring.

i Assessment

The dispersion of inert dust from the activities at the site was quantitatively assessed in the *Air Quality and Greenhouse Gas Assessment* (EIS Appendix E).

A community submission requested "private analysis of PM_{2.5} from the developer to ensure *National Environment Protection (Ambient Air Quality) Measure 2015* standards are met".

The *Air Quality and Greenhouse Gas Assessment* was prepared by Ramboll Environ, an independent consulting expertise with extensive experience in assessing air quality impacts from a wide range of facilities. The assessment modelled the dispersion of PM_{2.5} and compared the results to the *National Environment Protection (Ambient Air Quality) Measure* criterion. The facility was predicted to contribute 0.1 µg/m³ concentration of PM_{2.5} to the background PM_{2.5} concentration of 18.6 µg/m³ (based on the maximum 24-hour concentration). Therefore, any impact from PM_{2.5} will be negligible.

A community submission requested "information on projected air emission impact from north-west receptor sites equivalent to those conducted for receptors in the south and south-eastern quadrants".

The *Air Quality and Greenhouse Gas Assessment* tabulates the predicted airborne concentrations of total suspended particulates (TSP), particulate matter with an equivalent aerodynamic diameter of less than 10 micrometres (PM₁₀), and particulate matter with an equivalent aerodynamic diameter of less than 2.5 micrometres (PM_{2.5}) concentrations and deposited dust levels at residential receivers in accordance with the *Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales* (EPA 2005). Appendix 3 of the *Air Quality and Greenhouse Gas Assessment* presents contour plots of these potential pollutants that show the incremental (ie change from existing) concentrations in all directions from the site. Air quality criteria for TSP, PM₁₀ and PM_{2.5} are not predicted to be exceeded in any direction from the facility. Deposited dust levels are discussed below.

ii Background dust concentrations

The Frasers Property Australia's submission raises the following in regard to background PM₁₀ concentrations:

Background PM₁₀ concentrations were obtained from the NSW OEH Campbelltown West Air Quality Monitoring Station (AQMS) for the year 2014. The maximum 24-hour PM₁₀ concentration monitored at the AQMS during 2014 is noted as being 49.4 µg·m⁻³, on 21 November 2014. This concentration has been excluded from further data analysis on the basis that it is likely to be due to a localised event (the example of grass cutting is provided). The general approach for exclusion of elevated particulate events is that adopted within the National Environment Protection (Ambient Air Quality) Measure (AAQ NEPM) which identifies 'exceptional events' as: a fire or dust occurrence that adversely affects air quality at a particular location, and causes an exceedance of 1 day average standards in excess of normal historical fluctuations and background levels and is directly related to: bushfire, jurisdiction authorised hazard burning or continental scale windblown dust. The discussion provided indicates that coincident elevated concentrations were not experienced at neighbouring AQMS which suggests that the event was not related to wide scale dust or fire events. Additionally, the event was not in exceedance of the 1-day standard. It might be argued that the localised event could be typical of the area in which the Campbelltown West AQMS is sited, and therefore of the proposed Project site, and should be retained for further analysis. **It is recommended that further analysis of air quality data for the Campbelltown West AQMS is analysed to identify whether the distribution of PM10 concentrations in 2014 is typical or atypical of the longer term record. If elevated concentrations are often observed in other years examined, then these should be considered to be representative of the likely particulate environment of the area, or if atypical then additional confidence can be gained that they can be removed from further analysis.** The exclusion of a particular measurement on the basis that it was a localised event may not necessarily affect the conclusions of the assessment given that the off-site incremental impacts are predicted to be approximately 10% of the relevant criterion. However, on the basis that the measurement of 49.4 µg·m⁻³ is retained (and assuming that maximum incremental impacts occur on the same day), then exceedances of the 24-hour PM₁₀ criterion may be experienced in the surrounding environment due to the operation of the Facility. **This would suggest that a more refined assessment (contemporaneous analysis of incremental and background air quality) be performed, or that additional control measures should be implemented at the Facility to minimise emissions of particulate matter.**

Justification for the exclusion of the maximum 24-hour PM₁₀ background concentration of 49.4 µg/m³ is provided in *Air Quality and Greenhouse Gas Assessment* Section 5.2. This section explains why a realistic maximum 24-hour PM₁₀ background concentration of 38.2 µg/m³ was adopted for the assessment. It is noted that 49.4 µg/m³ is only just below the maximum 24-hour PM₁₀ criteria of 50 µg/m³. Adoption of this level as the background level would mean that any development in the region that contributed an incremental dust contribution 0.6 µg/m³ or more at a sensitive receiver would not comply with the maximum 24-hour PM₁₀ criteria. This would curtail many external activities in south-western Sydney.

iii Management measures

As described in EIS Section 6.2.1, a range of dust management measures will be implemented, including:

- Construction: minimising dust emissions through measures such as speed limits, apply water to control dust and recording any exceptional incidents that cause dust and/or air emissions;
- Operations:
 - the entire site will be sealed except for the landscaped frontage;
 - water sprays will be used;
 - a wheel wash will be used to clean truck tyres to prevent mud or sediment being carried to and deposited on the driveway and public roads;
 - potentially dust generating activities will be generally undertaken within the main shed.

The predicted incremental and cumulative particulate matter concentrations, dust deposition rates and odour concentrations generated at the facility will be well below the corresponding NSW EPA criteria at the assessment locations (see EIS Table 6.4).

iv Construction dust impact assessment

The Frasers Property Australia's submission raises the following in regard to air quality impacts from construction:

The construction dust impact assessment has been performed using a risk based approach. The selection of receptors at which construction dust impacts have been considered has not taken into account places of work (medium sensitivity receptors for dust soiling in the UK IAQM methodology), such as the Coles Distribution Centre. Place of work are also included in the medium sensitivity category for PM₁₀ health effects although it is acknowledged that the workers at the Coles Distribution Centre would be located inside and for periods of less than 24 hours and as such, would be considered less sensitive to PM10 health effects. **Should assessment of dust soiling impacts at the Coles Distribution Centre (<20m to the site boundary) be assessed, this would be considered to be a medium sensitivity area for dust soiling impacts. The risk of impacts associated with earthworks would be in the medium risk category as opposed to the low risk category as identified in Table 6-1 of the AQIA. The mitigation measures provided in Section 10.1 of the AQIA are appropriate for low risk ratings only. Additional controls over and above those provided in Section 10.1 should be identified to mitigate/minimise this risk.**

The construction period will be short, 10–12 weeks. There will be initial minor earthworks over about three weeks for foundations and then the site will be sealed. The main processing shed and fence will be constructed onsite from metal; pre-constructed site offices and weighbridges will be installed and concrete blocks will be brought onto site to form bays. These activities will not generate appreciable quantities of dust.

Notwithstanding, the *Air Quality and Greenhouse Gas Assessment* recommended a number of dust mitigation measures and found:

The implementation of these measures would result in the Dust Impact Risk Rating for earthworks and truck movements (as described in Section 6.2.3 [of the *Air Quality and Greenhouse Gas Assessment*]) to reduce from low to negligible.

There is no requirement or justification for construction dust management measures beyond those summarised in the statement of commitments (see Table 5.1).

It is noted, that construction of the facility will use similar methods that have been used across the Smeaton Grange industrial estate, including construction on the site to the immediate north of the site in 2016.

v Emission control factors

The Frasers Property Australia's submission raises the following in regard to air quality impacts during operations:

It is noted that the AQIA has been performed without the inclusion of emission control factors associated with any windbreak effects provided by the waste transfer shed and therefore the particulate matter impacts predicted may be viewed as conservative. The level of risk associated with any elevation in particulate matter could be reduced however, should these operations be performed permanently within a building. **It is recommended that those periods when these operations are not performed be adequately defined in terms of material characteristics, control measures to be implemented if the operations are performed externally or prevailing meteorological conditions under which these operations would be performed.**

The *Air Quality and Greenhouse Gas Assessment* considered the full range of weather conditions that occur over a 12 month period and found that air quality impacts will be well below NSW EPA criteria at the assessment locations. However, further enclosure of stockpile areas is now proposed (see Sections 3.6.2 and 4.4).

vi Dust monitoring

The Frasers Property Australia's submission raises the following in regard to air quality impacts from construction:

The SEARs also require details of proposed mitigation, management and monitoring measures to be provided. No discussion of monitoring measures is provided within the AQIA. **Given the potential issues with nuisance dust within the boundary of the Coles Distribution Centre (see comment 4 [of the submission]), it would be recommended that a campaign of dust deposition monitoring be performed for the duration of the construction period.** Given that dust deposition contours are shown to be $>2 \text{ g}\cdot\text{m}^{-2}\cdot\text{month}^{-1}$ within the boundary of the Coles Distribution Centre during operation (Figure A3.6) **an appropriate period of dust deposition monitoring during operation at maximum throughput should be performed to ensure that exceedances of the nuisance dust criterion are not experienced on the land occupied by the Coles Distribution Centre.**

It also states that air quality monitoring should be required at the nearest sensitive receptor (including consideration of the sensitivities of commercial receptors sensitivity to dust deposition).

The EPA incremental dust deposition criterion of $2 \text{ g}/\text{m}^2/\text{month}$ is designed to protect against the potential nuisance caused by deposited dust, while TSP, PM_{10} and $\text{PM}_{2.5}$ criteria are designed to protect against the potential health effects of high airborne dust levels.

As shown in *Air Quality and Greenhouse Gas Assessment* Figure A3.6 (replicated in Figure 4.2 below), the predicted incremental annual average dust deposition level on the north-western boundary of the Coles Distribution Centre is predicted to be above the dust deposition criterion along a very short section of the road immediately within the boundary during operation of the facility. The dust deposition criterion applies to locations such as residences and it is inconceivable that the predicted minor exceedence of the criterion along a short section of a road outside a warehouse will result in a nuisance. The dust deposition criterion is not predicted to be exceeded at any other properties.

As shown in *Air Quality and Greenhouse Gas Assessment* figures A3.1 to A3.5, operations of the facility will only result in small incremental increases in TSP, PM₁₀ and PM_{2.5} concentrations. These increases will not result in these health-based criteria being exceeded.

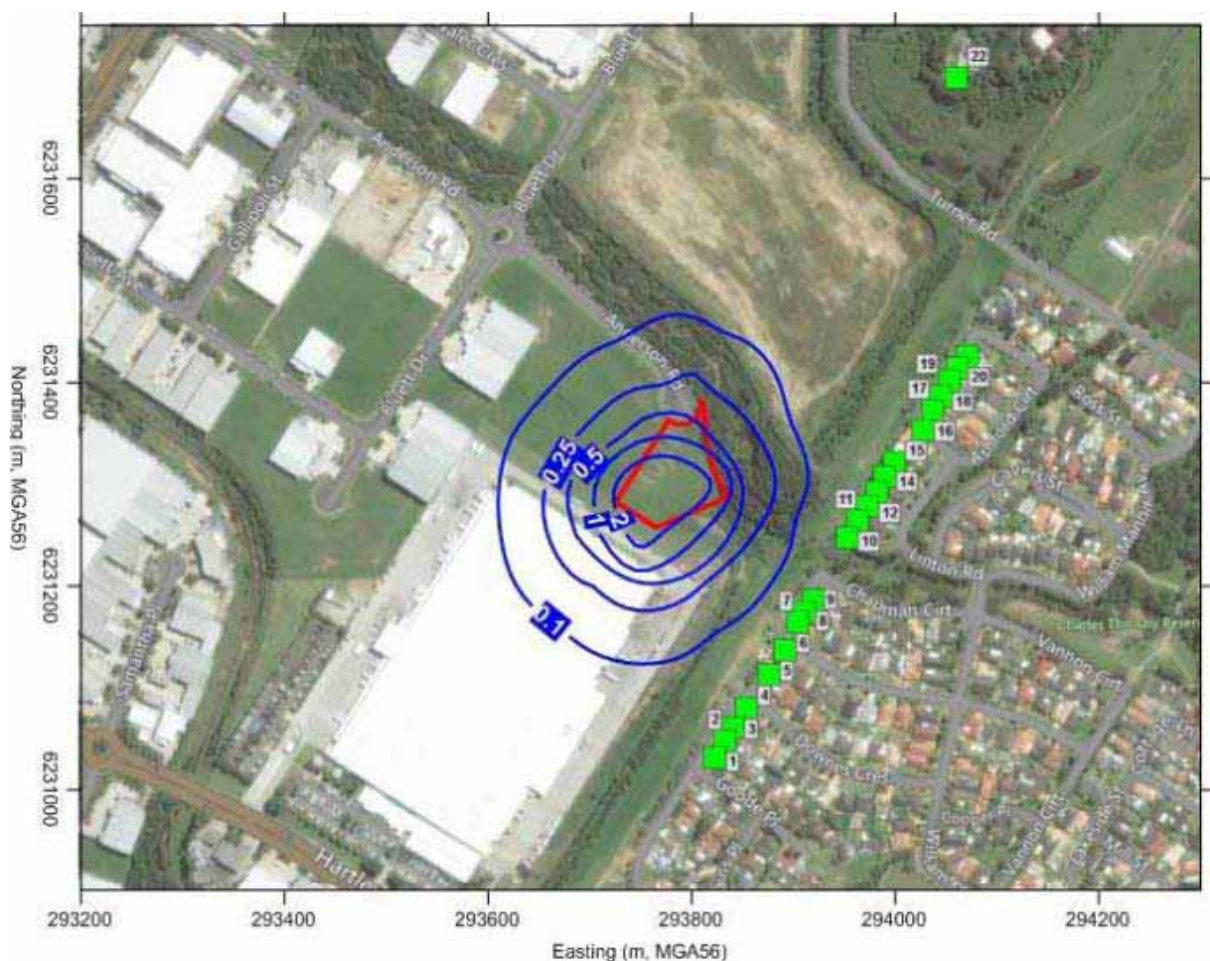


Figure 4.2 Predicted incremental annual average dust deposition levels (g/m²/month) [*Air Quality and Greenhouse Gas Assessment* Figure A3.6]

As summarised in EIS Section 6.2.2 and detailed in the *Air Quality and Greenhouse Gas Assessment*, there will be no material air quality impacts as a result of construction or operation of the facility. Air quality monitoring is therefore not required or justified for the construction or operation of the facility.

Based on publically available EPLs and project approval conditions for the construction of larger facilities and operations in Smeaton Grange, we are not aware of dust monitoring requirements for other facilities in the area.

vii Air quality approval conditions requested by Frasers Property Australia's

Frasers Property Australia's requested that proposed conditions include:

- A dust management plan should be developed for both the construction and operational phases of the Facility.
- The dust management plan should include commitments to a range of dust mitigation techniques which are appropriate to ensure that dust emissions do not impact upon surrounding sensitive receptors.
- The dust management plan should take into consideration the range of sensitivities in the area, including commercial and residential, and be suitable to minimise impacts upon each of those land uses.
- The Facility should be constructed and operated in a manner that minimises dust emissions.
- Any sorting, processing or storage of materials should be performed within the waste transfer holding shed. Should any sorting, processing or storage of materials be required to be performed outside of this area for any reason, then sufficient dust mitigation should be implemented to effectively eliminate dust emissions.

These generally accord with Benedict Recycling's expectations and the following items have been added to the statement of commitments (see Table 5.1):

- the site Environmental Management Plan (EMP) will detail dust management during construction and operations; and
- Benedict Recycling will implement dust management measures (described in the EMP) so that dust emissions are minimised and do not impact upon surrounding sensitive receptors.

The majority of sorting, processing or storage of materials will occur within the main processing shed and the management measures described in EIS Section 6.2.1 (and will be expanded in the EMP as required) will be implemented. These measures will minimise any dust emissions so that they are close to eliminated.

4.3.3 Air pollution

There were 35 submissions that raised air pollution.

The potential impacts of airborne dust are assessed in the *Air Quality and Greenhouse Gas Assessment* (EIS Appendix E). Further clarifying information is provided in Sections 3.1.2, 3.6.3 and 4.3 of this RTS.

The facility will not accept any hazardous waste and will not generate toxic air pollution.

One submission states "[a]ir emission modelling does not consider the impact of sulfur dioxide which is dictated under the National Environment Protection (Ambient Air Quality) Measure, 2015."

The *Air Quality and Greenhouse Gas Assessment* assesses the emission and dispersion of air pollutants that have the potential to be emitted from the site. It does not consider all of the air pollutants listed in the *National Environment Protection (Ambient Air Quality) Measure* and the *Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales* as the majority, including sulfur dioxide, do not have the potential to be emitted from the site in concentrations that could potentially degrade local air quality.

One submission states that emissions from the decomposition of garden and wood wastes have not been considered. As described in Section 3.6.3, measures will be implemented to prevent green waste decomposing or composting which preventing the emission of gases associated with these processes.

4.4 Site operations

The Frasers Property Australia submission states that “further justification for some of the operations proposed to be performed external to the building should be provided”.

As described in the EIS and in this RTS, noise and dust emissions from the site will be minimal. However, Benedict Recycling has provided the additional commitments to minimise dust and noise emissions (see Table 5.1):

- materials (waste, products and residues) will be stockpiled in the shed or in a marked bay;
- wastes will be processed in the shed or within the screening plant area (see Figure 1.2) and will not be processed outside of these areas;
- green waste will only be stockpiled in the shed; and
- timber will be stockpiled in a covered bay.

4.5 Social

4.5.1 Proximity to residences

There were 60 submissions that raised proximity of the facility to residences.

The south-east boundary of the site is closest to residences (about 120 m). The site is separated from these residences by the electricity easement and areas of trees. The mound on the north-western side of the easement largely obscures views of the Coles Distribution Centre from Chapman Circuit (see Photograph 4.1 - the top of the Coles Distribution Centre is just visible in the upper left of the photograph). The facility will be further back from the easement than the distribution centre and even the top of the wall is unlikely to be visible from residences.



Photograph 4.1 **Viewpoint 7 (Chapman Circuit): view north-west from eastern side of easement (adjacent residential development)**

Residences are generally afforded the greatest level of protection by the EPA noise and air quality criteria used in the assessments as residences are occupied at all hours by all members of the community including children and the elderly. The EIS considers the potential impacts of the facility on the closest residences. The EIS found that there will be no material impacts on air quality at these residences and noise levels will be within EPA criteria with one minor exception. The exception is a single assessment location (R22 - which is approximately 400 m north-east of the site) where during a temperature inversion during the morning shoulder period, a minor exceedance of up to 1 dB is predicted to occur (see Section 3.7.2).

Air quality and noise management measures that will be implemented at the facility are described in Section 3.6.5x.

Vehicles will access the facility from roads within the Smeaton Grange industrial estate and arterial roads distant from the facility. Based on the application of EPA guidelines, the facility site is not too close to residences.

4.5.2 Health concerns

There were 50 submissions that raised health concerns as a result of the project.

The facility will only accept inert waste. It will not accept putrescible waste so there will be no risk from pathogens from the facility. It will not accept hazardous waste so there will be no toxicological risk.

As described in Sections 3.1.2 and 4.3, all EPA air quality criteria set to protect human-health will be met.

4.5.3 Proximity to child care centre

There were 30 submissions that raised proximity of the facility to the child care centre.

The Young Academics Child Care Centre at 89 Anderson Road, Smeaton Grange, is about 650 m north-west of the facility. As described in Section 4.3, no material impacts on air quality or noise at the closest residences, so there will be no impacts on the child care centre.

The facility will generate approximately 276 additional daily traffic movements, including 106 additional daily truck movements. All of these vehicles will pass 89 Anderson Road which is near the corner of Anderson Road and Anzac Parade. At this location the combined daily traffic volume which is currently using both Anderson Road and Anzac Parade is similar to the Anderson Road traffic at the Camden Valley Way intersection, which is approximately 15,000 vehicle movements daily.

The proportional facility-generated traffic increase from an additional 276 vehicle movements daily at this location is approximately 1.8%, which is not predicted to have a material impact on the existing traffic flow or traffic safety for other road users in the vicinity of the child care centre.

All loads will be covered so there will be no risk to the centre or other adjacent premises from airborne particulates (see Section 4.8.8).

The facility will not accept loads containing asbestos (see Section 4.8.2).

4.5.4 Reduced quality of life

There were 26 submissions that raised reduced quality of life as a result of the facility.

The EIS assessed the potential impacts of the facility, including to air quality, noise levels, visual amenity and roads and traffic. With the exception of noise levels between 6 am and 7 am at one residence when there is a temperature inversion, all impacts will be below noise and air quality criteria set by the NSW Government to protect health and amenity. From the residential areas, the facility has a similar appearance to the other buildings in the Smeaton Grange industrial area. Accordingly, the quality of life of local residences will not be reduced as a result of the facility.

More broadly, the facility will recycle materials, assisting government recycling targets to be met. Further, the larger community expects that unwanted resources are recycled to the greatest possible extent rather than being disposed to landfill. Recycling and, hence the facility, will result in an overall increase in the quality of life.

4.5.5 Proximity to community services

There were 17 submissions that raised proximity of the facility to community services.

With the exception of the vegetation corridor along Kenny Creek, there are no public recreation areas or community services such as schools that are closer to the facility than the residences to the south-east. Given that no material impacts are predicted at these residences, no impacts are predicted at any other location.

The vegetation corridor along Kenny Creek close to the site has industrial development to the north and south and is not believed to be widely used as a community recreation area. It will not be materially impacted by the facility. Any children playing in the corridor would not be able to enter the site from the corridor due to the fences along the site's eastern boundary.

4.5.6 Safety

There were 13 submissions that raised decreased safety as a result of the facility, including in relation to health impacts, particularly from airborne dust (see Sections 3.1.2 and 4.3) and from asbestos (see Section 4.8.2).

Road safety is addressed in Section 4.2.2.

A number of submissions raised the safety of children. The site will be fully fenced the front gate locked when the facility is not operating. It will be inaccessible to children and will not pose a safety risk.

4.5.7 Values of homes

There were nine submissions that raised reduced values of homes as a result of the facility.

The site is within a large existing industrial estate that is zoned IN1 General Industrial under the Camden LEP 2010 and will be consistent with the character of the industrial estate, particularly with the implementation of the project design and environmental management measures. The facility will not reduce quality of life in the local area (see Section 4.5.4). Therefore, the facility it is not expected to reduce the value of local homes.

The facility will provide local tradesmen with opportunities to recycle their waste locally. This will reduce waste disposal costs, including travel times, assisting to reduce building costs, and hence the price of new houses and other developments in the area.

4.6 Lighting

There were 14 submissions that raised light pollution.

The walls and roof of the shed and the 10 metre tall fence on the south-western and south-eastern sides of the site will shield the residences from lighting on the site.

Flood lights will be installed in accordance with Australian Standard 4282 *Control of Obtrusive Effects of Outdoor Lighting*. This will include:

- installing lights below the top of the 10 metre tall fence;
- avoiding upward lighting;
- fitting directional light fittings and screening lights so that light does not spill offsite; and
- only using lights required for safe operations or security.

Flood lighting will only be used as required for safe operations or security. The site layout and lighting management measures described above will minimise light spill. The site will not contribute significantly to external lighting levels at residences compared to existing street lighting.

4.7 Ecology

4.7.1 Local environment and wildlife, including along Kenny Creek

There were 29 submissions that raised impacts on the local environment and wildlife, including along Kenny Creek.

The vegetation corridor was created as part of developing the Smeaton Grange industrial estate. In 2002, Kenny Creek drained a series of farm dams and there were only a handful of trees along its bank north of the site. These were largely cleared, the creek rock armoured and new trees planted around 2007.

The vegetation corridor containing Kenny Creek will not be physically disturbed by the facility.

There will be a Colorbond fence on the boundary of the facility preventing access to the vegetation corridor from the site (see Figure 1.2).

Lighting from the facility will be of a similar nature to existing street lighting (see Section 4.6) and is not expected to result in any additional impacts.

Noise from the site is not expected to disturb wildlife as the area already experiences elevated noise levels from surrounding industrial area and roads.

The potential for pests to be introduced to the area as a result of the facility is discussed in Section 4.7.2 and potential impacts on water quality are discussed in Section 4.7.3.

The facility will not directly or indirectly impact on Kenny Creek, the vegetation corridor or wildlife in the corridor.

4.7.2 Introduction of pests

There will be no putrescibles, for example food waste, accepted on to the site. Therefore, animals (native animals or vermin) will not be introduced to the site through waste loads and will not be attracted to the site.

Delivered waste will have a short residence time on the site before being sorted, and the sorted waste dispatched. Waste will not be stockpiled for sufficient time to allow animals (eg rats or termites) to construct nests that could facilitate increasing numbers in the area. If there are termites in timber delivered to the site they are unlikely to cross open ground around the facility or increase termite numbers in the wider area.

4.7.3 Water quality

As described in the *Water Assessment* (EIS Appendix G), runoff from the site will be directed to a sedimentation basin in the north-eastern corner of the site. The concept stormwater plan is presented in Figure 4 of Appendix G. The water stored in the basin will be reused onsite for dust suppression.

Any treated outflow from the basin will be piped to the kerb inlet pit in the cul-de-sac. This is part of the Smeaton Grange industrial estate stormwater system. A plan of the stormwater system at the eastern end of Anderson Road is provided in Appendix B.

As described in EIS Section 6.6.3 and EIS Appendices G and H, a surface water management system will be installed. With the exception of the landscaped area facing Anderson Road, the site will be completely concrete/asphalt sealed and kerbed with the site's surface graded towards the sediment control pit in the north-east corner of the site. All water not used onsite will be treated in the sedimentation trap and discharged to the subdivision's stormwater system, noted above. The discharge will be tested to ensure that it meets the water quality criteria that are typically applied to sedimentation trap discharges included in environment protection licence (Table 4.2).

Table 4.2 Concentration limits in discharges from the sedimentation basin

Pollutant	Unit of measure	Maximum (100th percentile) concentration limit
Oil and grease	milligrams per litre	10
pH	pH	6.5–8.5
Total suspended solids	milligrams per litre	50

Therefore, water from the site is not expected to impact the water quality in the creek.

4.7.4 Impact on Cumberland Plains Forest Remnant

There were nine submissions that raised impacts on Cumberland Plains Forest Remnant.

Cumberland Plains Forest is an endangered ecological community (EEC). It is unlikely that this vegetation community occurs in the vegetation corridor adjacent to the eastern boundary of the site. However, depending on the revegetation program in 2007, this corridor could contain very young River Flat Eucalypt Forest community which also an EEC. The facility will not disturb this vegetation or impact on its habitat value.

The vegetation corridor was recently formed by planting and there is already human activity occur along its length. The eastern boundary of the site bordering the corridor is about 100 m long. This is about 5% of the other industrial developments or roads that immediately border the corridor within the Smeaton Grange industrial area.

4.7.5 Introduction of seeds from noxious plants

There were four submissions that raised the introduction of seeds from noxious plants.

As described in Section 3.1.2, the facility will typically receive some coarse vegetation such as branches and stumps, generally in skip bins mixed with waste from demolition sites. It will not receive green waste from kerb-side collections. There is a low potential for seeds from noxious plants to be introduced to the site. Given that the site will be sealed and surrounding by a solid fence there is a low potential for seeds to blow into adjacent areas.

4.8 Other matters

4.8.1 Hours of operation

There were 26 submissions that raised the proposed hours of operation of the facility.

The proposed hours of operation have been reduced in response to the feedback received (see Section 3.1.1).

4.8.2 Asbestos

There were 14 submissions that raised concerns regarding exposure to asbestos.

The protection of facility workers from exposure to asbestos is a paramount concern to Benedict Recycling. Accordingly, a range of measures will be implemented to ensure that waste that contains asbestos or that could potentially contain asbestos is not accepted at the facility. These measures are outlined in EIS Section 2.3.4 and will be described in detail in the Incoming Waste Quality Plan. The plan will be prepared in accordance with the *NSW WorkCover Management of Asbestos in Recycled Construction and Demolition Waste Guide* (NSW WorkCover 2010). The contents of the plan are described in EIS Section 2.3.4.

The measures to protect of onsite workers will also protect anyone in the neighbouring industrial and residential areas.

Further information on the inspection of loads and the measures that will be taken when loads are rejected is provided in Section 3.6.5xii.

4.8.3 General objection

There were nine submissions that a raised general objection to the facility without providing any specifics.

4.8.4 Cumulative impact with galvanising plant

There were eight submissions that raised cumulative impact with a nearby proposed galvanising plant.

Corplex Pty Ltd has applied to construct and operate a galvanising plant at 42A Bluett Drive, Smeaton Grange.

The closest corner of the galvanising plant site is about 160 m north-west of the entrance of the Smeaton Grange Waste Recycling and Transfer Facility on the far side of Kenny Creek. An assessment of potential cumulative impacts from the facility and galvanising plant is provided below.

i Air quality

As described in Section 3.1.2, air quality impacts during construction of the facility will be negligible. Even if the facility and the galvanising plant are constructed at the same time, the contribution of construction of the facility to any cumulative air quality impacts will be negligible.

The potential air quality impacts from the operation of the galvanising plant are assessed in Todoroski Air Sciences (2015) and Todoroski Air Sciences (2016). Dust is the only air pollutant that will be emitted from both sites. The *Smeaton Grange Waste Recycling and Transfer Facility Air Quality and Greenhouse Gas Assessment* (EIS Appendix E) found that the maximum incremental 24-hour PM₁₀ concentration predicted at any residential receiver is 1.3 µg/m³, which corresponded to a maximum cumulative 24-hour PM₁₀ concentration of 39.5 µg/m³. The maximum incremental 24-hour PM₁₀ concentration predicted at any residential receiver as a result of operation of the galvanising plant is 0.16 µg/m³. Therefore, there will be no measurable air quality impact from the simultaneous operation of the galvanising plant and the waste recycling and transfer facility.

ii Noise

Potential cumulative noise impacts from existing and successive developments are considered by the *Industrial Noise Policy* procedures by ensuring that the appropriate noise criteria are established with a view to maintaining acceptable noise amenity levels. For the galvanising plant, the amenity criteria were determined by the *Proposed Galvanising Facility at Smeaton Grange Noise and Vibration Assessment* (Wilkinson Murray 2016) to be 55 dB, 45 dB and 40 dB for day, evening and night periods, respectively.

The cumulative impact of the facility with existing industrial noise sources has been assessed in the determination of the acceptable amenity levels at the assessment locations.

Based on experience with similar sites, amenity noise levels from such sites are typically 3 dB below the intrusive noise level. On this basis, the highest predicted amenity level at any residential assessment location from the facility is up to 37 dB ($L_{Aeq,period}$) for all assessment periods. Based on the predicted intrusive levels provided in Wilkinson Murray (2016), and a similar assumption regarding amenity noise levels from the site, the highest predicted day, evening and night-time amenity noise levels are 41 dB, 38 dB and 35 dB, respectively. This could result in cumulative noise levels of 42 dB, 41 dB and 39 dB at the nearest assessment location for day, evening and night periods. Hence, it is unlikely that concurrent operation of the galvanising plant and waste recycling and transfer facility will generate noise levels above the relevant amenity criteria at the assessment locations.

iii Traffic

The potential traffic impacts from the operation of the galvanising plant are assessed in Cardno (2015). This report found “[t]he completed development is projected to generate approximately 28 vehicle movements during peak hours. This level of traffic is expected to have no perceptible impact on the surrounding road network”. The potential traffic impacts from the operation of the facility are assessed in the *Traffic Impact Assessment* (EIS Appendix D). This report found that operation of the facility will generate 31 car/other light vehicle movements and 12 truck movements during the morning peak hour and less movements during the afternoon peak hour, and concluded “there will be no significant traffic impacts anticipated from [the] proposal on either traffic capacity, traffic delays or road safety on the surrounding major road network”.

The roads within the industrial estate are designed to support the industrial development of the sites within the estate, the combined hour truck movements from the two developments are small compared to the existing truck movements on surrounding roads (Narellan Road, Camden Valley Way and Hartley Road) and no significant traffic impacts are predicted for either development. Therefore, no cumulative traffic impacts are predicted.

iv Other

The facility is an industrial development consistent with the other uses of the industrial estate. Therefore, the any cumulative impacts associated with the facility, eg changes to visual amenity, have been considered as part of the EIS.

4.8.5 Inappropriate zoning

There were eight submissions that raised that the site is inappropriately zoned and that it should be zoned as Light Industrial (IN2).

Councils are responsible for land zoning. As described in EIS Section 3.3.3, the site is zoned IN1 General Industrial under the Camden LEP 2010 and the facility is permissible with consent.

The facility meets the definition of a “waste or resource management facility” in the Camden Local Environmental Plan 2010 Dictionary. A waste or resource management facility is also permissible with consent in a Light Industrial (IN2) zone.

4.8.6 Conflict with the surrounding environment

There were eight submissions that raised that the facility is generally in conflict with the surrounding environment.

The impact of the facility on the surrounding environment is described in EIS Chapter 6 and further information is provided in this RTS. There will be few impacts from the facility and its development would not be in conflict with the surrounding environment.

4.8.7 Insufficient management measures

There were seven submissions that raised that insufficient management measures are proposed.

A range of management measures are proposed in the EIS that have been developed to minimise impacts from the facility. Additional management measures in response to submissions received are provided in Chapter 5. These will be included in the EMP for the site. The proposed measures are appropriate for the predicted low level of impact.

4.8.8 Litter concerns

There were six submissions that raised litter.

It is illegal to transport waste in an uncovered tray or trailer. Signs will be erected at the facility regarding drivers' legal obligation to ensure that waste is covered during transport. Covers on vehicles or trailers delivering waste will be removed once inside the facility. Vehicles dispatching products or residue will be covered prior to leaving the site.

The site will be surrounded by fences that will prevent any light waste being blown off the site.

Consistent with its other operations, Benedict Recycling will ensure that the area around the entrance to the facility is kept tidy and litter free.

4.8.9 Lead management

There were three submissions that raised lead pollution.

Lead paint was widely used prior to 1950. Lead was also widely used in building products, including as sheet lead, flashings, solder and pipes. It is therefore present in many older residences in NSW. As such, small amounts of lead may be brought into the facility with construction and demolition waste.

All mixed construction and demolition waste will be tipped within the main processing shed. Metals, including any lead, will be separated from other wastes. It will be stockpiled in the non-ferrous waste bin for dispatch to a licensed metal recycling facility.

Paint-contaminated building or demolition waste, eg painted panels, window frames, doors and posts, is classified as inert waste in accordance with the *Protection of the Environment and Operations Act 1997* (PlanningNSW & NSW EPA 2003). It can be disposed to a licensed Inert Waste Class 1 or Class 2 landfill or to a solid waste landfill. The transporter is not required to be licensed. All timber received by the facility will be stockpiled undercover (see Section 1.1.2). Other than being sorted, it will not be processed at the facility.

The classification of paint waste and residues, eg paint dust and scrapings, depends on the source of the waste (PlanningNSW & NSW EPA 2003). They may be classified as solid waste and can be disposed to a licensed Inert Waste Class 1 or Class 2 landfill if appropriately packaged or may be classified as hazardous waste and need to be handled and disposed of accordingly. Given this uncertainty, paint waste and residues will not be accepted by the facility.

Lead within stockpiles at the facility will not be exposed to rainfall (unlike during its use on buildings prior to being demolished). Therefore, runoff containing potentially environmentally harmful lead concentrations is not expected to occur.

4.8.10 Contamination

There were three submissions that raised contamination.

Operation of the facility is not expected to result in contamination either on the site or off the site because:

- only inert wastes will be accepted;
- no putrescible, hazardous (including asbestos) or liquid wastes will be accepted;
- materials that could potentially form leachate if left uncovered for sufficient time, eg green wastes, will be stored undercover;
- the surface of the site will be sealed preventing any water on the site leaching into the underlying soil; and
- runoff will flow to a sedimentation basin.

Therefore, no on-site or off-site contamination is predicted to occur (see also Section 4.7.3).

4.8.11 Bushfire prone land

There were two submissions that raised that the site is partly within bushfire prone land.

The eastern part of the site is within bushfire prone land. This has been assessed in the *Bushfire Hazard Assessment* (EIS Appendix I). The *Bushfire Hazard Assessment* describes measures to enable the facility to comply with the objectives of the *Planning for Bush Fire Protection Guideline 2006* (NSW RFS 2006). 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 facility buildings.

The risk of the facility initiating a bushfire will be minimised through the implementation of mitigation and management measures, including:

- a solid 10 m high fence will be constructed between the facility and adjacent bush fire hazard vegetation;
- ongoing management of landscaping vegetation within the APZ;
- maintaining a separation of at least 10 m between fixed gas cylinders and flammable materials; and
- construction of the office building in compliance with section 3 of *Australian Standard 3959-2009*.

4.8.12 Emergency response

Frasers Property Australia's submission states:

Given the isolated nature of the site and the single access road, concern is raised regarding site evacuation in the event of an emergency such as a fire. **It is requested that Frasers and Coles are notified and included as part of any emergency protocol to ensure the Coles facility and all the employees on site are not placed at risk.**

The majority of the wastes that are expected to be received and stockpiled by the facility (see EIS sections 2.5 and 2.6) will not be flammable. There will be small quantities of wastes such as paper and plastic that will be screened from mixed waste. Standard measures will be implemented to prevent fires from starting, such as no smoking within the site. The shed, fences and structures will generally be constructed from metal or other non-flammable materials. All stockpiles will be within the main processing shed or will be shielded from offsite by the 10 m tall fence (see Figure 1.2). Therefore, the chances of a fire occurring on the site are low. The chances of any fire onsite spreading offsite are very low.

The site's Emergency Response Plan will be provided to Frasers and Coles. The procedure and will include a procedure (including telephone contact numbers) to be implemented should there be a risk to Coles' employees or property.

4.8.13 Maximum height

Frasers Property Australia's submission states:

The site is subject to a 10 m maximum building height limit as per the provisions of Camden LEP 2010. **While Table 3.2 of the EIS acknowledges the proposal complies with this limit, no indication is provided of the actual height of the proposed development. It is requested that this detail is provided within the EIS so that the visual impacts can be fully understood.**

The maximum height of the facility will be 11 m (see EIS Section 2.2), which is consistent with the DCP height limit for buildings in the Smeaton Grange industrial estate.

Updated plans and projections, including maximum heights, are provided in Appendix C.

4.8.14 Relevant plans

In the Council submission, under the heading “Public Interest”, the Council summaries the submissions that it received directly, stating:

The EIS must include all relevant plans, architectural drawings, diagrams and relevant documentation required under Schedule 1 of the Environmental Planning and Assessment Regulation 2000. A locality/context plan drawn at an appropriate scale indicating a 1-3km radius from the site to include nearby residential dwellings, local features such as heritage items, the location of schools, childcares, and recreation facilities.

The EIS includes all relevant documentation. There is no requirement for a “locality/context plan drawn at an appropriate scale indicating a 1-3km radius from the site to include nearby residential dwellings, local features such as heritage items, the location of schools, childcares, and recreation facilities” in Schedule 1 of the Environmental Planning and Assessment Regulation 2000.

A site location plan is provided in EIS Figure 1.1, wider views are provided elsewhere in the EIS (including appendices) as appropriate to when considering potential impacts of the facility. For example, EIS Figure 6.1 shows air quality and noise sensitive receiver locations and EIS Figure 6.2 viewpoints. Both show all of the locations, including the closest residences that were assessed to determine if impacts will occur at these locations.

4.8.15 Question for the Minister for Planning

Under the heading “Public Interest”, the Council states:

Questions are raised as to why the Minister of Planning advised that a public hearing should not be held.

Consultation, including meetings regarding the facility are described in Chapter 2. The NSW Planning Assessment Commission (PAC) will determine whether the proposal is approved or rejected. The PAC commonly hold public meetings as part of this process.

4.8.16 Funds for waterways

Under the heading “Public Interest”, the Council states:

No funds have been spent by the State Government and Council in managing waterways and the remnants of the Cumberland Plain Forest in the area.

This is a matter for the State Government and Council.

5 Updated commitments

EIS Chapter 7 summarises the commitments made by Benedict Recycling to manage potential environmental impacts resulting from the construction and operation of the facility. These commitments, along with additional commitments as described in this RTS (highlighted in bold) are summarised in Table 5.1.

A site specific EMP, to be required as a condition of consent, will be prepared for the facility that incorporates the site specific measures. All Benedict Recycling staff will be trained to understand and implement the EMP as it relates to the tasks that they are undertaking.

Table 5.1 Updated summary of mitigation measures

Key issue	Management measure
Facility design	The facility will not be open between 10 pm and 6 am. The screening plant and External Bay 6 will be covered with a roof (approximately 5 m off the ground) to minimise moisture entering the timber stockpile. The roof will be within the site and adjacent to the 10 m tall fence so will not be visible from offsite. To minimise dust and noise emissions: - materials (waste, products and residues) will be stockpiled in the shed or in a marked bay - wastes will be processed in the shed or within the screening plant area (see Figure 3.3) and will not be processed outside of these areas; - green waste will only be stockpiled in the shed; and - timber will be stockpiled in a covered bay. The facility's front fence will be constructed as a combination decorative metal and masonry fence in accordance with <i>Camden Council Development Control Plan 2011 D4.2.5 Fencing</i>.
Air quality	The site environmental management plan (EMP) will detail dust management during construction and operations. Benedict Recycling will implement dust management measures (described in the EMP) so that dust emissions are minimised and do not impact upon surrounding sensitive receptors. Sorting and storage of materials will occur within the main processing shed and the management measures described in EIS Section 6.2.1 (and expanded in the EMP as required) will be implemented to minimise any dust emissions so that they are close to eliminated. Management measures that will be implemented during construction and operations to minimise air quality impacts will include: - Construction: - record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken; - record any exceptional incidents that cause dust and/or air emissions, either on or off site, and the action taken to resolve the situation in the log book; - carry out regular site inspections, record inspection results, and make an inspection log available to the local authority when asked; - impose a maximum-speed-limit of 20 km/h on all internal roads and work areas; - minimise idling vehicles onsite, wherever practicable; - ensure proper maintenance and tuning of all equipment engines; - ensure vehicles entering and leaving sites are covered to prevent escape of materials during transport; and - provide an adequate water supply on site for effective dust/particulate matter suppression/mitigation.

Table 5.1 Updated summary of mitigation measures

Key issue	Management measure
	• Operations: – all existing sealed areas must be maintained; – water sprays will be used over any other bare surfaces that have potential to generate unacceptable amounts of dust; – water sprays will be used at stockpiles, operational areas and the screening plant during material handling; – a wheel wash in the weighbridge area will be used to clean truck tyres to prevent mud or sediment being carried to and deposited on the access road (and public roads); – dust generating activities will be generally undertaken within the main shed; and – no composting will be undertaken on the site.
Greenhouse gases	Management measures that will be implemented during construction and operations to minimise greenhouse gas emissions will include: • on-site equipment will be regularly maintained and serviced to maximise fuel efficiency; • vehicle kilometres travelled on site will be minimised; and • energy efficiency will be progressively reviewed and implemented throughout the life of the facility.
Noise	Management measures that will be implemented during operation to minimise noise impacts will include: • choosing quieter plant and equipment, including installing best-practice noise suppression equipment, based on the optimal power and size to most efficiently perform the required tasks; • plant with high noise emissions will generally be located inside the shed; • plant and equipment will be regularly maintained and serviced; low-frequency reversing alarms (“growlers”) will be used rather than the standard high frequency beepers; • a site layout has been adopted that minimises the need for mobile plant to reverse; • plant and equipment will be switched off when not in use; • any vehicle queuing will be on site rather than on public roads; • material drop heights will be minimised and dragging materials along the ground will be minimised; • site contact details will be provided on a board at the front of the site; • any noise-related complaints will be handled promptly; and • a complaints register will be maintained. Benedict Recycling will commission noise verification monitoring at the closest residences to the south-east (R9) and to the north-east (R22) (or at equivalent locations) within 3, 6 and 12 months of the start of operations.
Transport	Signs will be erected at the facility requesting customers access the facility via Camden Valley Way via Anderson Road. Signs will be erected at the facility regarding drivers’ legal obligation to ensure that waste is covered during transport. Vehicles dispatching products or residue will be covered prior to leaving the site.
Visual	Management measures that will be implemented during construction and operations to minimise visual impacts will include: • this site will be colourbond fenced on the boundaries; and • the visual appearance of the site entrance on Anderson Road will be landscaped and kept tidy.

Table 5.1 Updated summary of mitigation measures

Key issue	Management measure
Water	Excavation into the alluvium on the site will be avoided where feasible. While no significant dewatering is predicted to be required during the construction of footings, DPI Water will be notified and a aquifer interference licence will be obtained if more than 3 ML of groundwater needs to be extracted during construction. Features to prevent impacts to groundwater include: • no significant excavations within the site; • existing sheds will be used to house the majority of the processing activities, preventing generation of runoff from these activities; • bunded fuels storage area; • sheds and the segregated heavy waste stockpiling and processing area will be outside of major overland flowpaths; • surface water captured within the runoff management system will be used for dust suppression so that mains water is not required for this purpose; • the majority of the site will be asphalt sealed to minimise the requirement for dust suppression using water (see Section 2.10.1); • groundwater will not be used; and • water will not be used in the product processing, other than for dust suppression. The site runoff controls will include: • a concrete perimeter kerb to keep runoff from entering and leaving the site; • an onsite detention/sedimentation basin/control device on site and remove sediment; and • flows from the sediment device will be controlled to ensure that poor quality water is not discharged from site.
Bushfire	In order to maintain APZs, the landscaping vegetation will be maintained as follows: • canopy cover will be kept at less than 15% of total surface area and will be kept at least 2 m from the roof line of a building; • garden beds and shrubs will not to be located under trees and sited at least 10 m from any exposed windows or doors; and • lower limbs of trees up to 2 m above the ground will be removed. Services including Water, gas and electricity services will be located and installed in a manner that reduces the potential for them to contribute to fire hazard. Water for fire fighting will be provided as follows: • existing fire hydrants in Anderson Road; • fire hydrants in the shed; • extinguishers and fire hydrant at the office building; and The following requirements from Chapter 4 of PBP will be applied to water infrastructure: • above ground pipes external to structures in the APZ will be metal including and up to taps; • pumps in the APZs will be shielded; and • Fire hydrants at buildings which will be spaced, sized and pressured in accordance with <i>Australian Standard 2419.1-2005 Fire Hydrant Installations – System Design, Installation and Commissioning</i>. In relation to the diesel tank: • the diesel tank which will be installed in accordance with <i>Australian Standard 1940:2004 The Storage and Handling of Flammable and Combustible Liquids</i> and will be fully enclosed in a colourbond shed.
Contamination	In the event of encountering suspected contaminated land, the area should be left undisturbed until a suitably qualified consultant can assess the area in question and provide appropriate mitigation measures identified if required.

Table 5.1 Updated summary of mitigation measures

Key issue	Management measure
Diesel spill	<u>Prevention</u> Overfilling of tanks will be prevented through gauging or monitoring of the tank's contents. Tanks, vents and fittings will be inspected regularly and valves will be regularly overhauled (at periods not exceeding 10 years). Hoses used for transfer of diesel, these will be regularly inspected. <u>Protection</u> The diesel tank will be self-bunded. The bund will be large enough to contain a spillage in accordance with the requirement of AS1940 para 5.8. The bund drain valve will be kept closed and locked except during supervised drainage, and a sign will be placed to display the need to keep the drain valve closed and locked. Provision will be made to quickly shut off the flow of liquid from the storage tank to a consuming device in an emergency. The shut off valve will comply with para 6.3.3 in AS1940, including resistance in a fire. Diesel pumps will be designed such that the discharge pressure cannot exceed design limit of pump or piping in the case of dead heading (shut-off at the pump discharge). An emergency shut-off device will be provided on each pump. There will be a diesel spill kit stored at the bowser. <u>Detection</u> Regular inspections by site personnel will be undertaken. Any liquid inside the bunded areas, such as rain water or any spilt liquid, will be removed following established procedures.
Emergency and evacuation management plans	An emergency and evacuation plan will be prepared for the site that will include notification of neighbours in the event of a potential emergency. The site's Emergency Response Plan will be provided to Frasers and Coles.
General	Benedict Recycling will ensure that the area around the entrance to the facility is kept tidy and litter free.

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Appendix A

Community factsheet (August 2016)

SMEATON GRANGE

WASTE RECYCLING & TRANSFER FACILITY

Benedict is seeking to develop a Waste Recycling and Transfer Facility at 52 Anderson Road, Smeaton Grange.

The facility will have capacity for up to 140K tonnes of waste per year, diverting it from landfill.

Benedict will make sure the Smeaton Grange Waste Recycling and Transfer Facility will have minimal impact on the local community.

**WE HAVE LISTENED TO YOUR
CONCERNS AND MADE CHANGES**

**WE HAVE REDUCED OUR
OPERATIONAL HOURS**

**THE SITE WILL NOT
EMIT ODOUR**

**THERE WILL BE NO GARBAGE OR
GARBAGE TRUCKS**

**NO TRUCKS IN RESIDENTIAL
STREETS**

**WE ARE COMMITTED TO
THE COMMUNITY**

ADDRESSING PRIMARY COMMUNITY CONCERNS

NO ODOUR

Odour-generating materials will not be accepted by the site and activities on the site will not produce odours.

OUR RECYCLING FACILITY WILL NOT EMIT ODOUR

We understand residents' concerns regarding the odour from Spring Farm Advanced Resource Recovery Facility and Kimbriki Resource Recovery Centre, in other locations in Sydney.

The waste accepted and processing of the waste at those two operations is very different from those proposed at the Smeaton Grange Waste Recycling and Transfer Facility.

There are different types of general solid waste (i.e. not special, liquid or hazardous waste):

- **Putrescible:** solid waste that contains organic matter capable of being decomposed by microorganisms. As putrescible wastes decay and are processed they produce odours, as does composting.
- **Non-putrescible:** waste that does not readily decay under standard conditions; emit offensive odours; or attract vermin or other vectors (such as flies, birds and rodents).

WE WILL ONLY ACCEPT NON-PUTRESCIBLE WASTE (NOT ODOROUS)

The Smeaton Grange Waste Recycling and Transfer Facility will only accept non-putrescible waste and will not be composting any vegetation.

NO PUTRESCIBLE OR GARDEN WASTE FROM KERBSIDE GARBAGE TRUCKS WILL BE ACCEPTED.

In contrast, the Spring Farm Advanced Resource Recovery Facility accepts general solid waste (putrescible) and garden organics and until late 2015 these waste were being landfilled on site.

Now these wastes are received and processed by composting and anaerobic digestion which can create odour. Kimbriki Resource Recovery Centre does not accept putrescible waste, but it does accept vegetation that it composts to produce a range of products.

WHAT WILL BE ACCEPTED AT THE FACILITY

ACCEPTED	NOT ACCEPTED
• Tiles, Bricks & Concrete • Glass • Asphalt • Gyprock • Paper/Cardboard • Cloth • Plastics • Rubber • Wood • Garden waste • Uncontaminated soils • Metals • Excavated natural materials (e.g. sand and sandstone)	• General solid waste - putrescible • Odorous waste • Hazardous waste • Clinical and related waste • Asbestos waste • Whole loads of waste tyres • Liquid waste • Restricted solid waste • Other "Special" waste (as per EPA gazettal notice)

TRAFFIC

NO TRUCKS TRAVELLING TO OR FROM THE FACILITY WILL USE RESIDENTIAL STREETS.

The majority of vehicles will be travelling to and from Camden Valley Way via Anderson Road. We will erect signs at the facility requesting customers access the facility via the above-mentioned routes.

The remainder of vehicles will be travelling to and from Narellan Road via Anderson Road, Anzac Avenue and Hartley Road. There will be no facility traffic on Hartley Road between 10pm and 6am because we will be closed.

MINIMAL IMPACT ON LOCAL TRAFFIC

There will not be any material delays in traffic as a result of the proposed recycling facility. Overall the facility will generate a total of 1.7 per cent (or less) of traffic on Hartley Road.

BENEFITS OF RESOURCE RECOVERY TO COMMUNITY

Smeaton Grange Waste Recycling and Transfer Facility will provide:

- employment opportunities for up to 15 employees and all employee parking will be on site and not on the public road
- convenient and cost effective recycling solution for the area, diverting tonnes of waste otherwise destined for landfill
- local tradesmen with opportunities to recycle their waste locally and use recycled products in their landscaping and building activities.

According to Government data, less than 10% of the estimated 2.5 million tonnes of commercial and industrial waste generated in Sydney each year is currently recycled.

Benedict specialises in resource recovery for the waste industry and diverts more than 90% waste from landfill. This is industry best practice. We take pride in our high rates of resource recovery, production, and supply and delivery of quality recycled materials to the community through innovative and environmentally responsible solutions.

Benedict's recycled products are turned into valuable, sustainable products and sold back into the industry for use in variety of applications and have been utilised in some of the major Sydney projects such as:

- Camden Valley Way and the
- M5 widening
- Barangaroo Development
- WestConnex M4 widening
- M2 upgrade
- NorthConnex
- Wet'n Wild Recreational Park
- Sydney Olympic Park

MINIMAL NOISE

WE HAVE LISTENED to the local community's concerns and are now proposing that between 10pm and 6am the facility will be closed and there will be no waste accepted nor processing between those hours.

The facility will be constructed and operated in

a way that noise levels will be below the project specific noise limits set using EPA methods for the location, and are based on noise levels measured in Currans Hill in December 2015 as part of the assessment.

WE WILL BUILD AN 11M TALL SHED AND A 10M TALL FENCE TO BLOCK ANY NOISE.

The noise study conducted as part of the EIS indicated an increase in noise levels. Benedict has addressed this issue by incorporating an 11m tall shed and a 10m tall fence into the proposal to shield residences from increased noise levels. This shed and wall is no taller than our neighbor's industrial buildings.

While the facility will result in additional traffic movements, the expected increase in resulting noise will be minor when compared to existing traffic volumes. The overall increase in road traffic noise levels to residences will be negligible.

OUR SITE WORK PRACTICES ARE DESIGNED TO MINIMISE NOISE EMISSIONS FROM THE SITE.

Residences are afforded the greatest level of protection regarding noise and air quality.

NEW REDUCED OPERATIONAL HOURS.

We have listened to the community and will no longer seek 24 hours of operations.

THE FACILITY WILL ACCEPT WASTE DELIVERIES AND DISPATCH MATERIALS ON

Mon to Fri	6am – 10pm
Sat	6am – 4pm
Sun	8am – 4pm

WASTE PROCESSING TIMES

Mon to Sat	7am to 4pm
Sun	No processing

Closed on all public holidays.

The EIS takes the potential impacts of the facility on the closest residences seriously and in its investigations found that there will be no material changes to the air quality at these residences and changes to noise levels will be within EPA criteria. Furthermore, we are happy to have regular monitoring to ensure our ongoing compliance.

Accordingly, the residences, businesses and schools that are further away from the facility will not be materially impacted by the facility.

ACCEPTED WASTE STREAMS



90% OF THE WASTE IS CONVERTED TO PRODUCTS FOR REUSE IN VARIOUS PROJECTS



BENEDICT'S RECYCLED PRODUCTS IN MARKET PLACE



Benedict's Recycling Process

ABOUT BENEDICT

Benedict was established in 1966 and is an Australian family owned and operated company. Benedict grew from being a haulage contractor to become the largest independent producer and reseller

of quarried, recycled and landscape products in NSW. Proudly Benedict is still growing today helping to meet the needs of Greater Sydney with its civil, landscaping and recycling requirements. Benedict's vision and track record is to restore

and improve the land it occupies to a better standard than we found it. At Benedict we take our responsibilities to the community very seriously and welcome the opportunity to work with you and address your concerns.



Benedict Family

Please feel free to contact us any time, by calling Ernest Dupere on **0407 282 444** or alternatively you can find more information including responses to some Frequently Asked Questions on our new dedicated Smeaton Grange website:

www.smeatongrangerecycling.com.au



Proposed Benedict Recycling Facility

Appendix B

Local stormwater system



Appendix C

Site plans (Revision E, 18 August 2016)

PROPOSED WASTE TRANSFER STATION AT 52 ANDERSON ROAD SMEATON GRANGE

DRAWING LIST

000	COVER SHEET	REV E
100	GROUND FLOOR PLAN 1:500	REV E
101	ROOF PLAN 1:500	REV E
200	ELEVATIONS 1 1:250	REV E
201	ELEVATIONS 2 1:250	REV E
500	DETAILS SHEET1 1:250	REV E
501	DETAILS SHEET2 1:100	REV E

REFERENCES

DRAWINGS TO BE READ IN CONJUNCTION WITH BUT NOT LIMITED TO ALL STORMWATER ENGINEERS, LANDSCAPE ARCHITECTS, AND OTHER ASSOCIATED PLANS & REPORTS

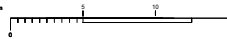
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A	02.02.16	ISSUED FOR GENERAL INFORMATION
B	04.03.16	ISSUED FOR GENERAL INFORMATION
C	06.05.16	ISSUED FOR GENERAL INFORMATION
D	23.05.16	ISSUED FOR GENERAL INFORMATION

notes

All dimensions and setouts to be verified prior to commencement
DO NOT SCALE measurements off drawings
Figured dimensions to be used at all times
IF IN DOUBT - ASK
All omissions or discrepancies to be notified to the architect

scale 1:500 @ A3



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date
FEB 2016

drawn
SS

project

PROPOSED WASTE TRANSFER STATION
52 ANDERSON ROAD
SMEATON GRANGE

drawing title

COVER SHEET

FOR DA APPROVAL

J15306

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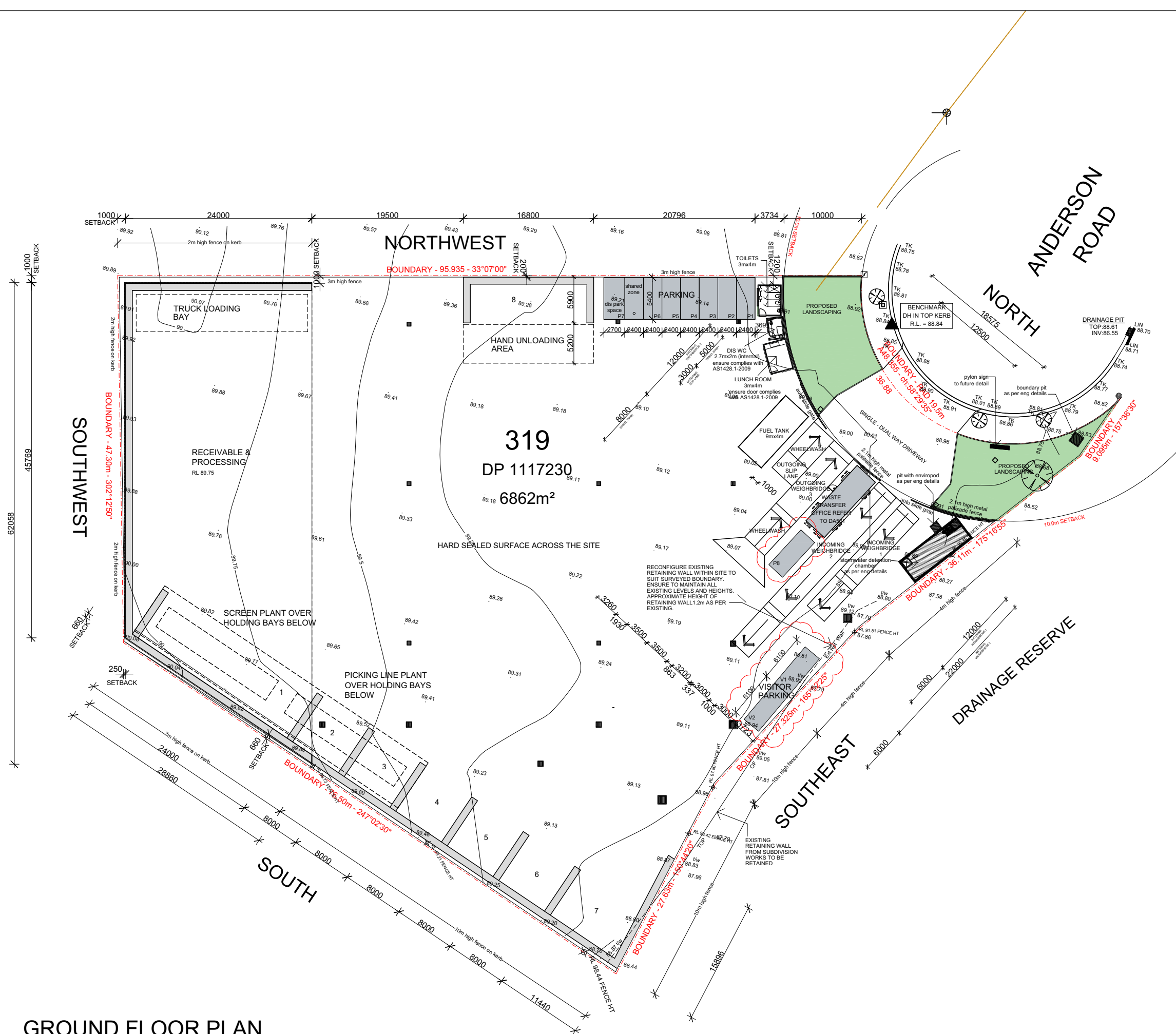
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GROUND FLOOR PLAN
SCALE 1:500

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E	18.08.16	ISSUED FOR GENERAL INFORMATION

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PROPOSED WASTE TRANSFER STATION
52 ANDERSON ROAD
SMEATON GRANGE

drawing title

GROUND FLOOR PLAN

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ROOF PLAN
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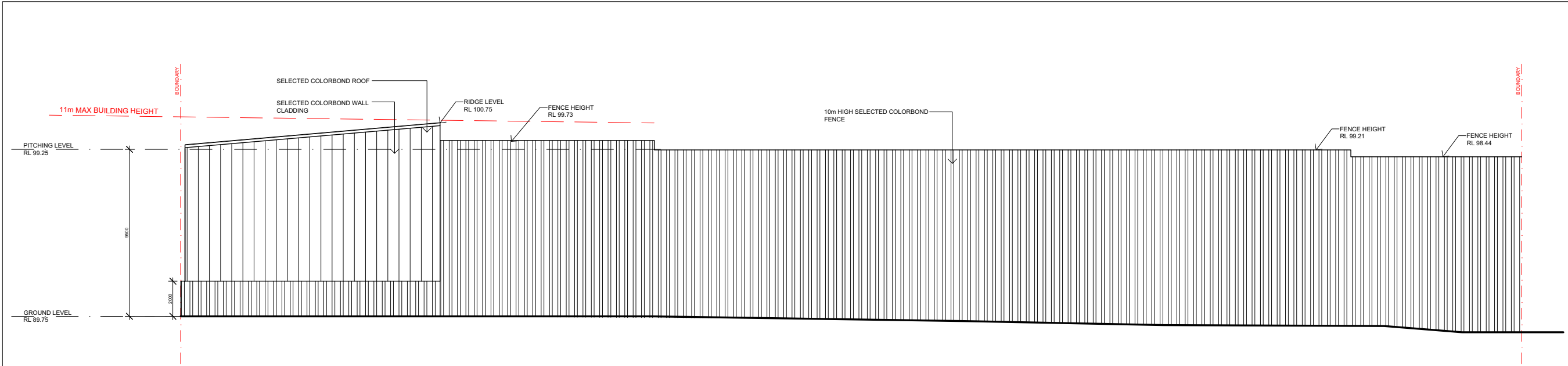
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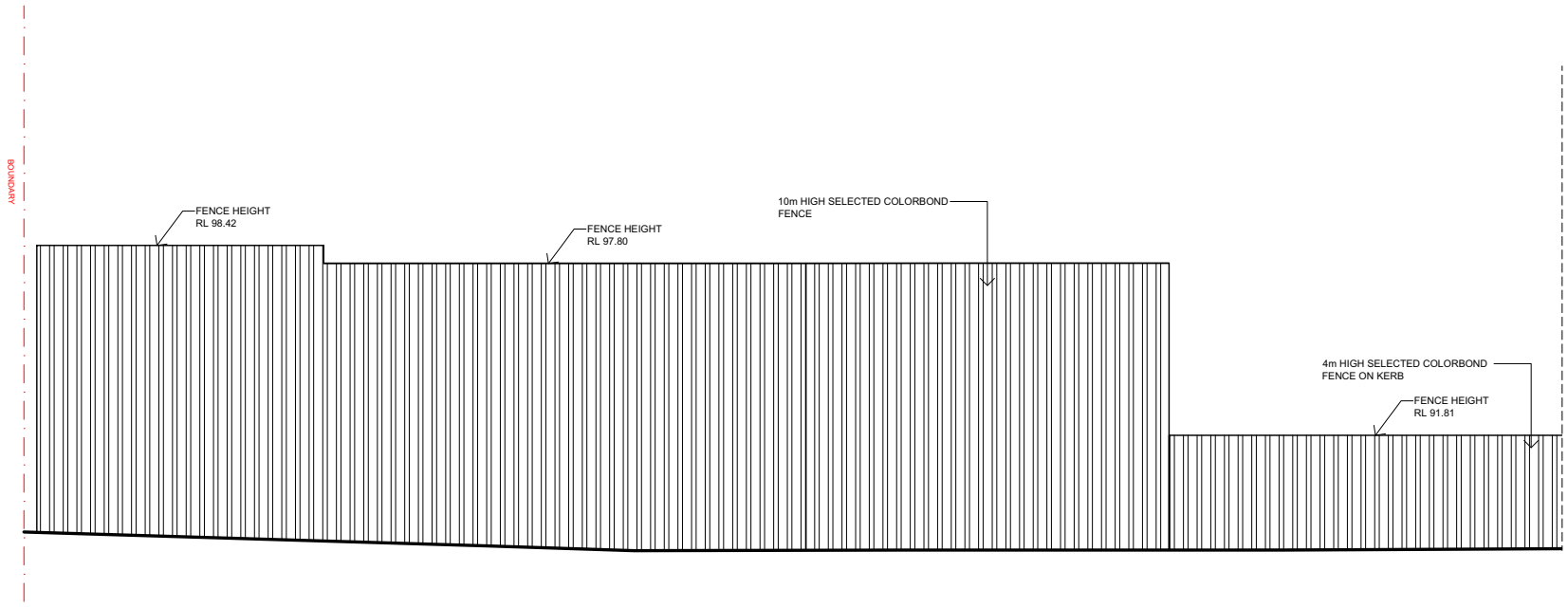
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52 ANDERSON ROAD
SMEATON GRANGE

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ROOF PLAN

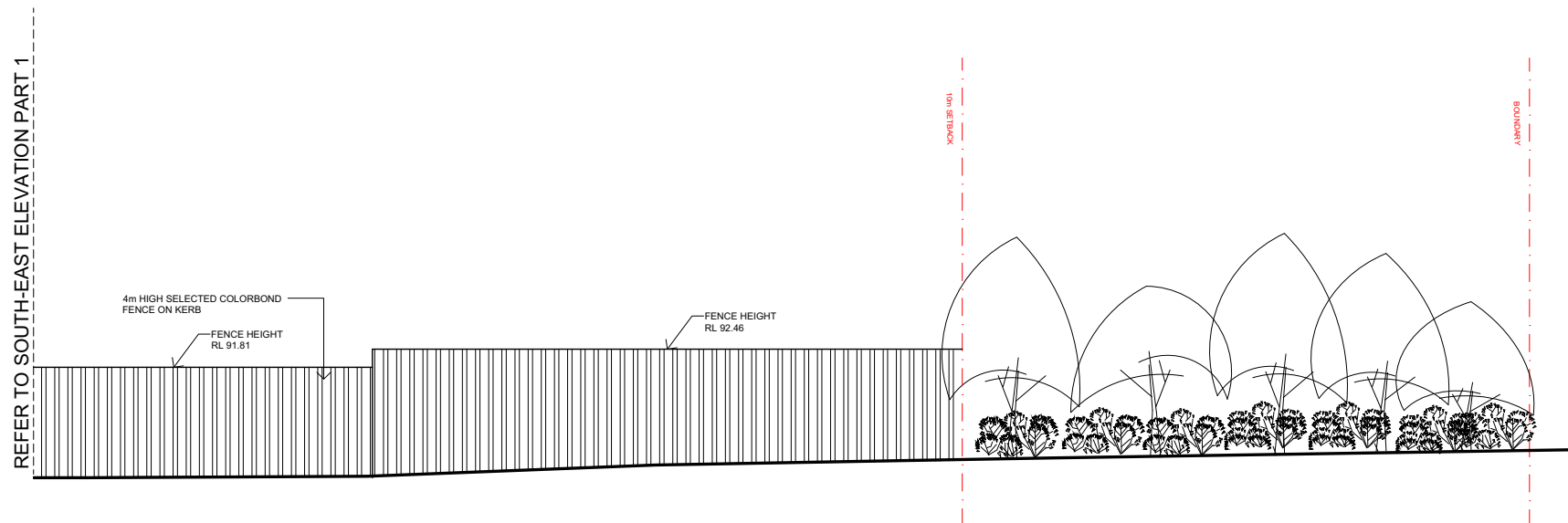
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SOUTH ELEVATION
SCALE 1:250



SOUTH-EAST ELEVATION (PART 1)
SCALE 1:250

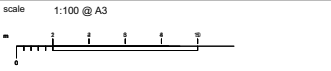


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REFERENCES
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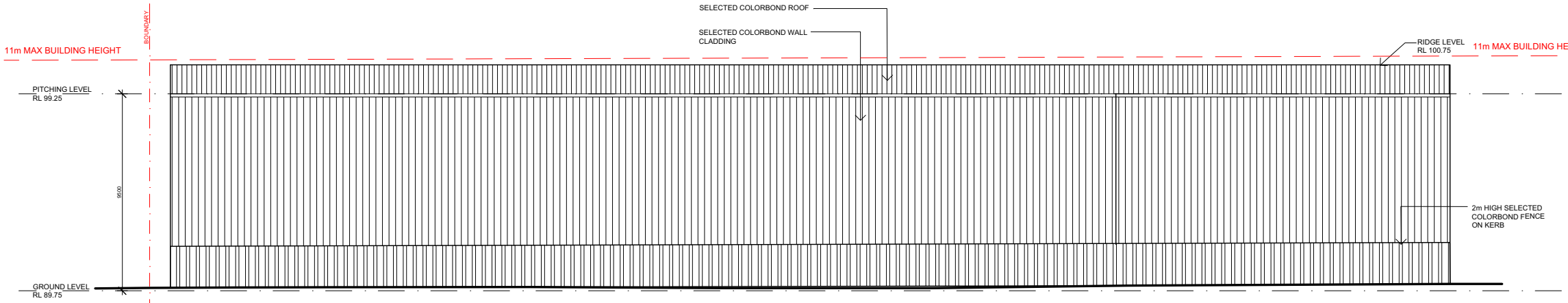
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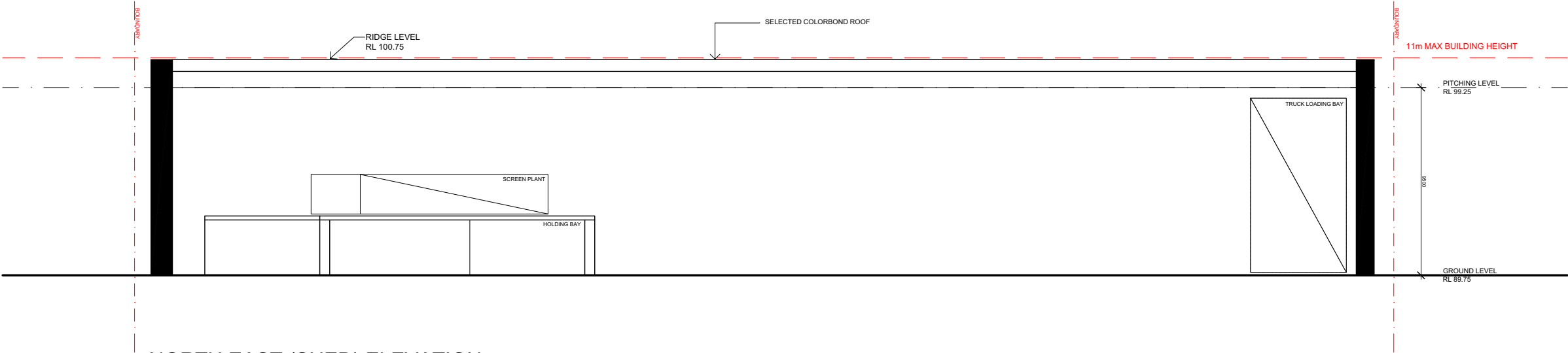
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52 ANDERSON ROAD
SMEATON GRANGE

drawing title
ELEVATIONS 1

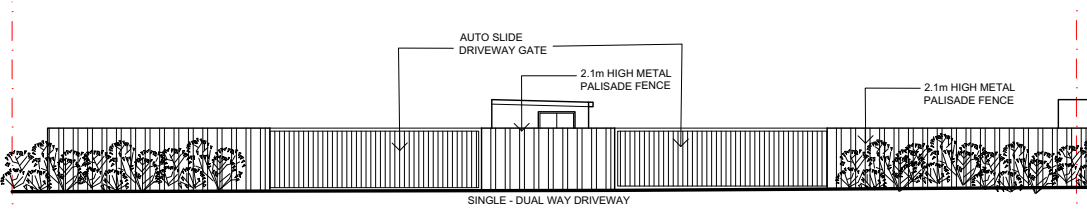
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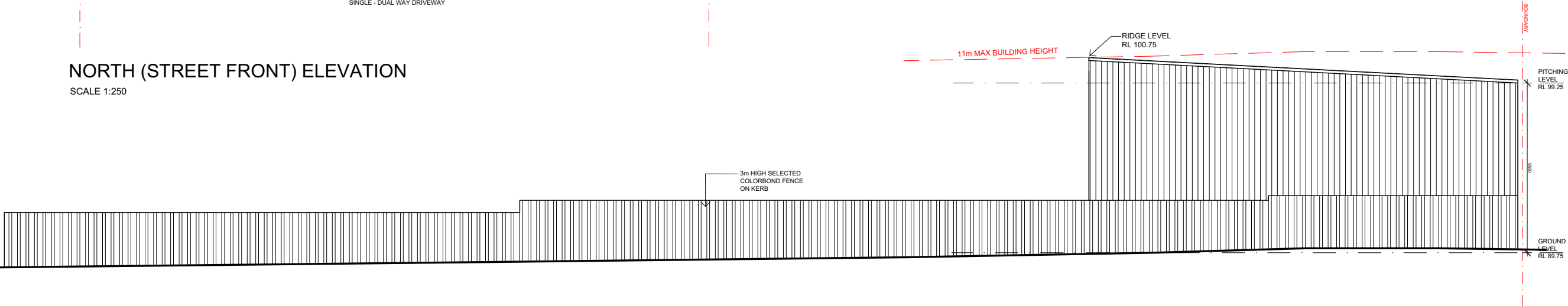
SOUTH-WEST ELEVATION
SCALE 1:250



NORTH EAST (SHED) ELEVATION
SCALE 1:250



NORTH (STREET FRONT) ELEVATION
SCALE 1:250

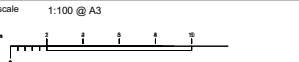


NORTH-WEST ELEVATION
SCALE 1:250

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C	06.05.16	ISSUED FOR GENERAL INFORMATION
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E	18.08.16	ISSUED FOR GENERAL INFORMATION

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DO NOT SCALE measurements off drawings
Figured dimensions to be used at all times
IF IN DOUBT - ASK
All omissions or discrepancies to be notified to the architect



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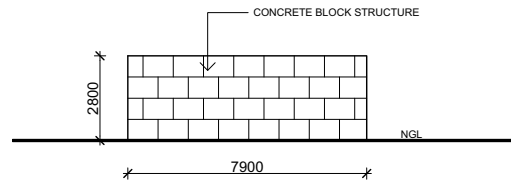
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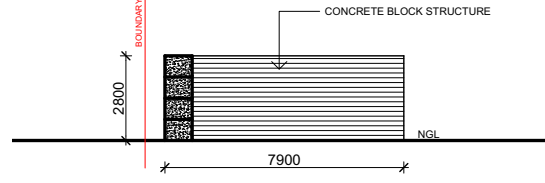
project
PROPOSED WASTE TRANSFER STATION
52 ANDERSON ROAD
SMEATON GRANGE

drawing title
ELEVATIONS 2

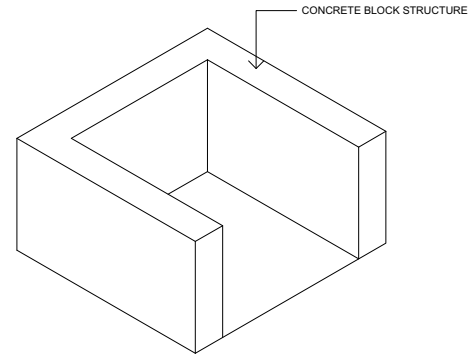
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job no.	drawing no.	rev



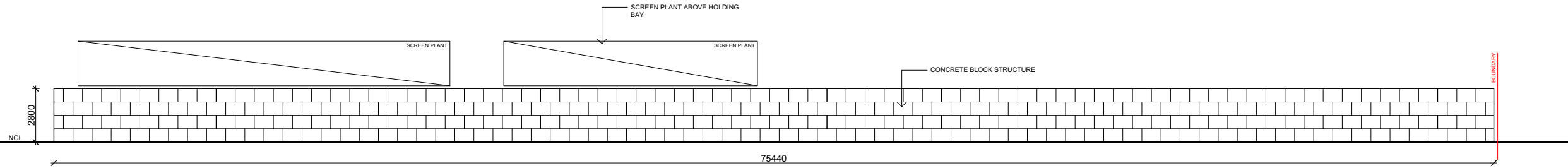
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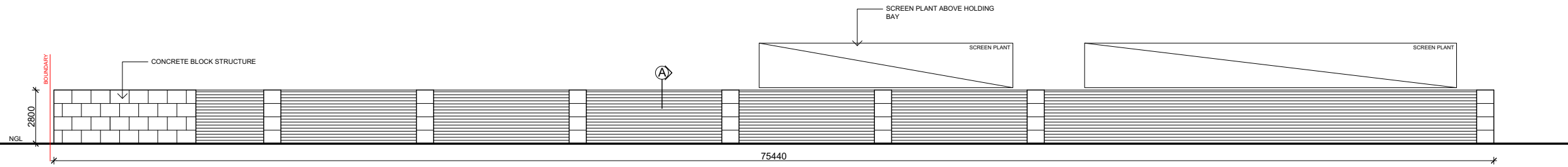
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SCALE 1:250



ISOMETRIC VIEW
SCALE 1:250



SOUTH ELEVATION
SCALE 1:250



NORTH ELEVATION
SCALE 1:250

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scale	1:100 @ A3

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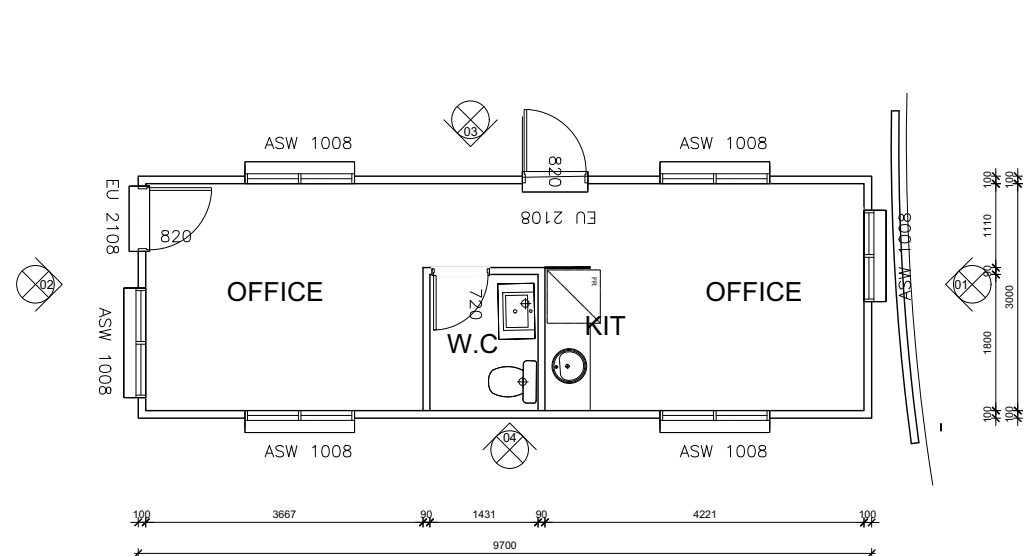
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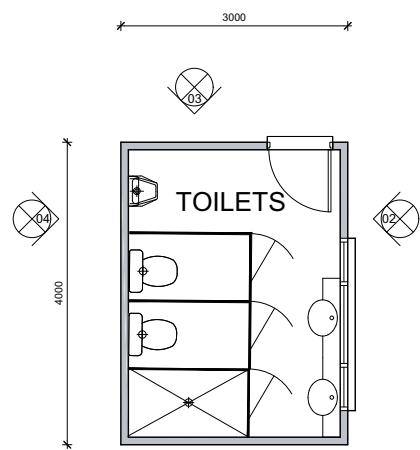
project
PROPOSED WASTE TRANSFER STATION
52 ANDERSON ROAD
SMEATON GRANGE

drawing title
DETAILS SHEET 1

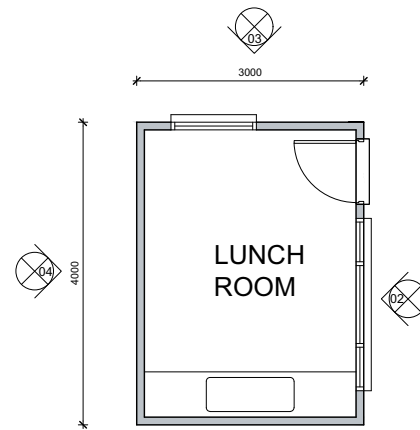
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J15306	DA	500
job no.	drawing no.	rev



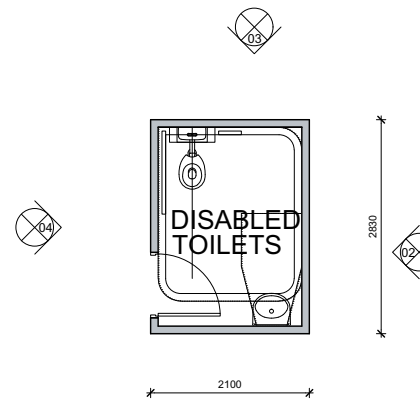
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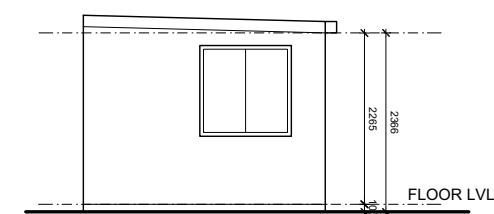
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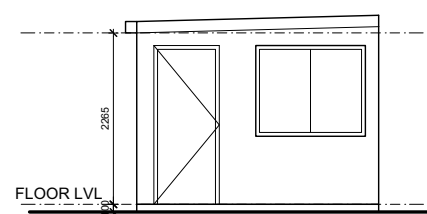
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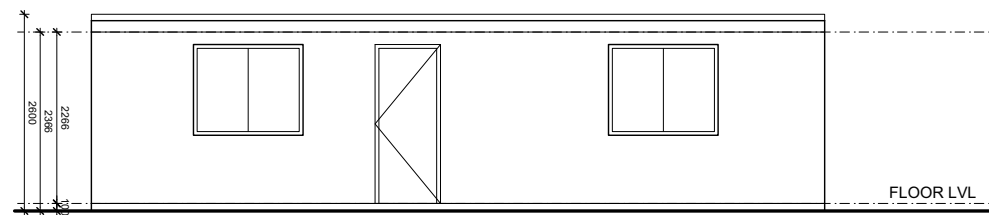
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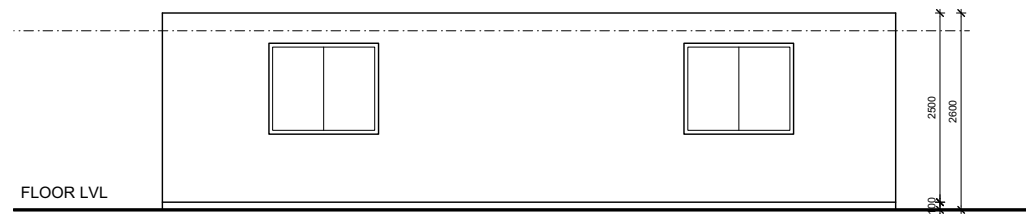
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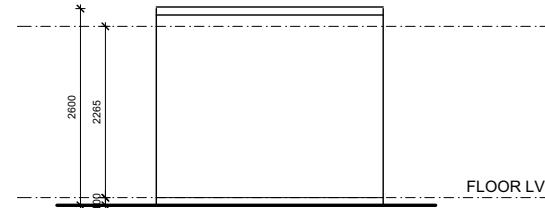
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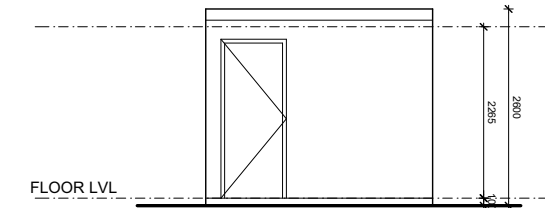
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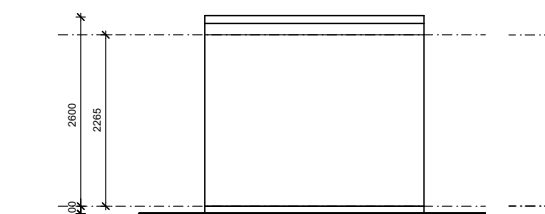
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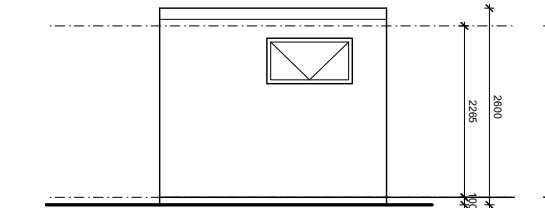
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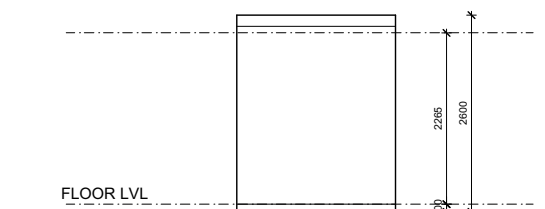
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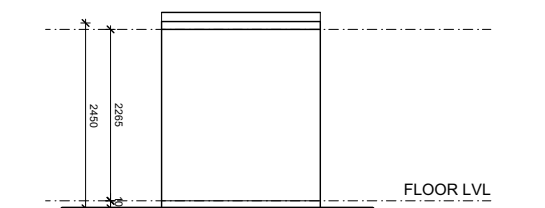
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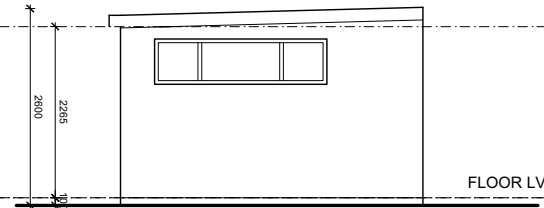
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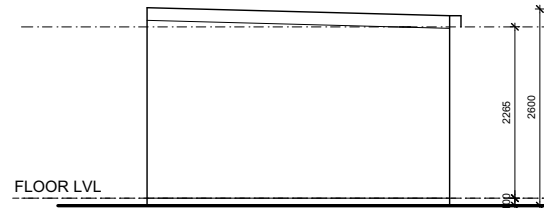
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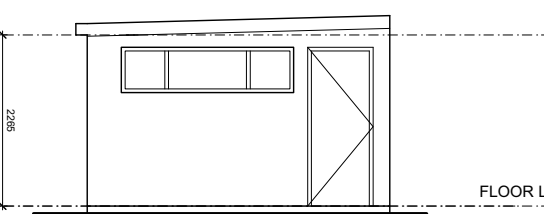
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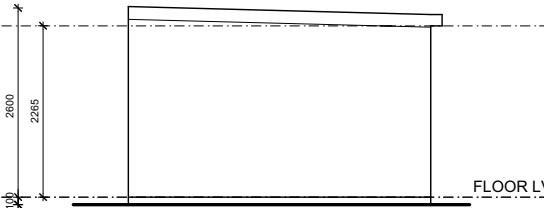
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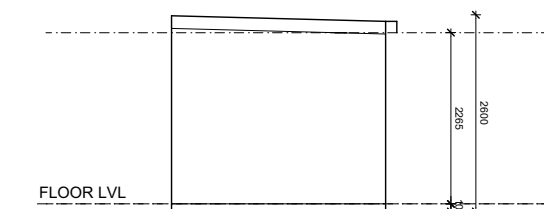
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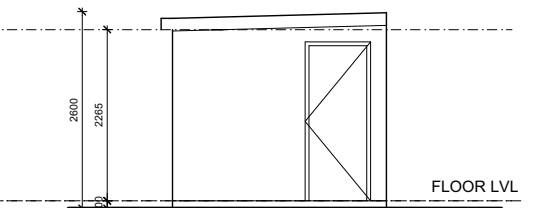
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SCALE 1:100



ELEVATION 04 (LUNCH RM)
SCALE 1:100



ELEVATION 02 (DIS TOILET)
SCALE 1:100



ELEVATION 04 (DIS TOILET)
SCALE 1:100

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project
PROPOSED WASTE TRANSFER STATION
52 ANDERSON ROAD
SMEATON GRANGE

drawing title
DETAILS SHEET 2

FOR DA APPROVAL J15306 DA	501	E
job no.	drawing no.	rev

Appendix D

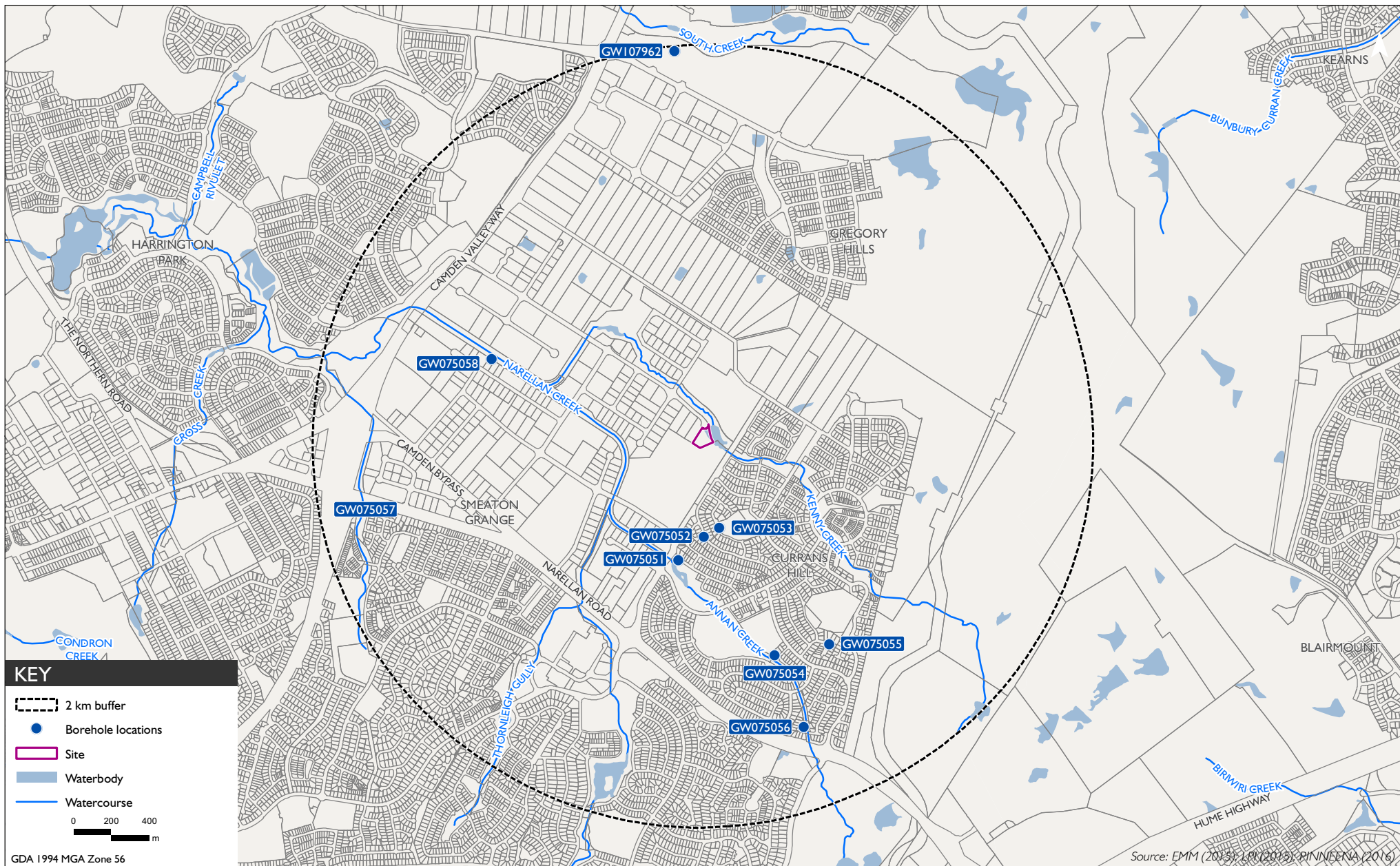
Landscaping plan

Species	Common name	Maximum height	Planting
<i>Eucalyptus tereticornis</i>	Forest red gum	30 m	Plant four trees either side of entrance
<i>Grevillea</i>	Boongala Spinebill	2 m	2 m spacing along fenceline
<i>Callistemon Citrinus</i>	Crimson Bottlebrush	4 m	2 m spacing along fenceline
<i>Lomandra longifolia</i>	-	15 m	Plant at 0.5 m spacing with mulching



Appendix E

Groundwater monitoring summary



Work number	Easting	Northing	Elevation (m AHD)	Distance from site boundary (m)	Bore depth (m BGL)	Standing water level (m BGL)	Reporting yield (L/s)	Salinity (mg/L)	Owner category	Date drilled
GW075051	293652	6230668	88.87	750	10.0	3.33	-	1080	DPI Water	3/02/1999
GW075054	294159	6230165	94.44	1300	5.5	-	-	-	DPI Water	4/02/1999
GW075058	292667	6231729	81.03	1200	5.0	1.00	3.00	416	DPI Water	3/09/1998
GW075056	294312	6229788	98.52	1600	11.0	-	3.09	2080	DPI Water	4/02/1999
GW075053	293868	6230837	95.87	500	9.8	-	-	-	DPI Water	4/02/1999
GW075052	293786	6230791	90.52	550	9.2	7.70	-	1952	DPI Water	4/02/1999
GW075055	294445	6230226	104.62	1250	4.6	-	-	-	DPI Water	3/02/1999
GW075057	292003	6230933	84.72	1900	11.0	2.97	0.10	4063	DPI Water	3/09/1998
GW107962	293631	6233348	92.16	1950	297.0	23.00	0.50	-	Private	30/06/2005

Appendix F

Swept path diagrams



22 November 2016
Ref 16068

EMM Consulting
Suite 1
20 Chandos Street
ST LEONARDS NSW 2065

Attn: Mr Taylor Richardson

Dear Taylor,

**52 ANDERSON ROAD, SMEATON GRANGE
ADDITIONAL TRUCK TURNING PATHS**

As requested, we have prepared a number of additional *swept turning path* diagrams for a 25m long B-double and a 19m long articulated truck accessing various parts of the proposed facility.

The *swept turning path* diagrams have been prepared using the *Autodesk Vehicle Tracking 2017* program in accordance with the requirements of *AS2890.1 – 2002* and confirm that all trucks will be able to enter and exit the site whilst travelling in a forward direction.

Please do not hesitate to contact me on telephone 9904 3224 should you have any enquiries.

Yours sincerely

Robert Varga
Director
Varga Traffic Planning Pty Ltd



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