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1 February 2017

Andrew Beattie
Principal Planner
Department of Planning and Environment
Level 22, 320 Pitt Street
Sydney NSW 2001

Re: Smeaton Grange Waste Recycling and Transfer Facility - Revised Response to Submissions

Dear Mr Beattie,

I write in response to your email dated 20 December 2016 regarding the draft Response to Submissions (RTS) dated 7 November 2016. The RTS has been updated to address the key issues and submissions provided in the 20 December 2016 email. Updates have also been made to relevant sections as required.

As requested in the 20 December 2016 email, the RTS has also been revised in order to meet the Department of Planning and Environment's (DPE) request to not directly reference DPE key issues provided by DPE's letter dated 5 September 2016 (reference SSD 7424) as a submission in the RTS.

Where possible, the responses to DPE key issues have been distributed within the RTS to the introduction or to responses to other agency submissions. Appendix A, below, details the location of responses related to DPE key issues contained within the 5 September 2016 letter and 20 December 2016 email. The remaining DPE key issues have been addressed directly within Appendix A.

Should you have any questions, I may be reached at trichardson@emmconsulting.com.au or 9493 9515.

Yours sincerely

Taylor Richardson
Planner
trichardson@emmconsulting.com.au

Appendix A

Response to Department of Planning and Environment Key Issues

1 Summary of response locations to Department of Planning and Environment Key Issues

Table 1 Response to key issues in letter dated 5 September 2016

Key Issue	Response location
Waste Streams	
• provide further details of the proposed waste streams, including:	
- the sources and locations of the waste streams being delivered to the site (including details of any contracts for large infrastructure projects); and	RTS cover letter, Appendix A, Section 2.A.1
- the location of landfills / recycling facilities the waste will be delivered to;	RTS cover letter, Appendix A, Section 2.A.2
• the Department acknowledges receipt of a letter from EMM, on behalf of the applicant, dated 12 August 2016, indicating that Benedict will no longer be seeking approval to operate 24 hours per day and therefore the facility would be shut between 10:00 pm and 6:00 am. This would need to be re-conflrmed in the RTS, together with the times the facility will accept waste deliveries and dispatch materials and waste processing times; and	RTS Section 3.1.1i
• provide clear and detailed justification as to the need for evening (6:00 pm to 10:00 pm) operations based on the proposed waste streams and provide an indication as to how often the site will be utilised during the evening.	RTS Section 3.1.1i
Traffic/Vehicle Movements	
• the Traffic Impact Assessment confirms that the level of service during peak hour is generally operating at capacity for the intersections of Camden Valley Way and Anderson Roads and the intersection of Hartley and Narellan Roads. Confirm whether the SIDRA analysis was undertaken before or after the upgrades to Camden Valley Way and Narellan Road. Should the upgrades have been undertaken beforehand, provide an updated SIDRA to determine impacts of intersections, if any;	RTS Sections 4.2.1i and Section 4.2.1ii
• provide the predicted spread of vehicle movements to and from the site during the intended operating period including the proportions of light and heavy vehicle movements;	RTS Section 4.2.1i
• provide details regarding the management of truck and vehicle movements within the site and extending into Anderson Road and cul-de-sac during peak waste delivery periods to ensure the safety and efficiency of the road network is maintained;	RTS Section 4.2.1vi
• provide a plan showing the potential stacking of vehicles within the site, including proposed traffic controls to be implemented to avoid queuing within Anderson Road;	RTS Section 4.2.1vi and Figure 3.1
• provide revised swept path plans depicting the largest sized vehicle manoeuvring to and from the "truck loading bay";	RTS Section 4.2.1v and Appendix F

Table 1 Response to key issues in letter dated 5 September 2016

Key Issue	Response location
• confirm the anticipated total and daily peak traffic volumes during construction. This information should include the number of heavy vehicles as a proportion of anticipated construction traffic; and	RTS Section 4.2.1i
• the plans must include sufficient staff and visitor parking. The site plan submitted provides for 7 car parking spaces and one accessible parking space when it is anticipated there will be 7 to 8 employees per shift and a requirement for at least 2 visitor parking places.	RTS Section 3.6.4
Process	
• provide a more detailed breakdown of the waste recycling process carried out on site, including timeframes for the removal of wastes and potential maximum daily processing rates;	RTS Section 1.1.1 and Figure 1.1
• provide a rationale for not fully enclosing the processing area given the site's close proximity to sensitive receivers;	RTS cover letter, Appendix A, Section 3
• confirm estimated maximum volume dimensions of the proposed waste stored and the location of the stockpile area within the covered area and the turnaround time for stockpile removal; and	RTS Section 1.1.2 and Figure 1.2
• provide the maximum amount of green waste proposed to be stockpiled at any one time and the maximum length of time before it is transferred offsite.	RTS Section 3.1.2
Air Quality	
• provide management measures should the stockpiling of green waste cause offensive odour.	RTS Section 3.1.2
Stormwater	
• provide details regarding the outlet direction of the drainage pit in Anderson Road where the sediment basin is piped.	RTS Section 4.7.3
Architectural & Landscaping Plans	
• confirm RLs on the architectural plans to ensure that the roof does not exceed 11 m maximum building height in Camden Council's Development Control Plan; and	RTS Section 3.6.5iii and Appendix C
• provide a landscaping plan accompanied by a plant schedule.	RTS Section 3.6.5iv and Appendix D

Table 2 Response to key issues in email dated 20 December 2016

Key Issue	Response location
• It is noted that the Department's key issues feature as a 'submission' in the RtS. It would be appreciated if the response to the key issues raised by the Department could be removed from the RtS and provided as a separate document. The table of contents and Section 3.1 should be updated accordingly. Additionally, it would also be appreciated if you could remove the Department from Table 2.1. The Department is the regulator rather than a stakeholder.	RTS cover letter, Appendix A
• Should you wish any signage to form part of this application, details should be provided including plans, elevations, colours and materials, illumination information and an assessment against State Environmental Planning Policy 64.	RTS Section 3.6.5viii
• Appendix F (Swept Paths) should now be attached, and the document updated	RTS Appendix F

Table 2 Response to key issues in email dated 20 December 2016

Key Issue	Response location
where relevant.	
• 3.3 (page 17) states that paper/cardboard would be sent to landfill. An explanation should be provided as to why these materials would not be sent to recycling.	RTS Section 1.1.1
• Section 3.3.3 (page 27) relates to rainwater reuse. a) how long would water be held in the sedimentation dam following an average rainfall event, and b) could a rainwater tank be considered for use as dust suppression?	RTS Section 3.2.3

2 Response to key issues regarding waste streams

A.1 Source of waste

The DPE requested further details on the proposed waste streams:

> the sources and locations of the waste streams being delivered to the site (including details of any contracts for large infrastructure projects)

The Sydney South West Growth Centre has been designated for long-term development over the next few decades and includes land in Camden local government area (LGA)[1].

Spring Farm Resource Recovery Facility is within the Camden LGA. It is operated by SUEZ Environment. The site includes the Alternative Waste Treatment Facility and is located at the site formerly known as Jacks Gully. The facility spans 38 hectares and over 100,000 cars and trucks use the Facility each year[2]. This facility accepts and processes mixed solid waste, recyclables and green waste from the Camden, Campbelltown City, Wollondilly and Wingecarribee LGAs. However, it does not accept and recycle the full range of inert wastes that are proposed to be accepted at the Smeaton Grange Waste Recycling and Transfer Facility, particularly mixed construction and demolition waste.

The waste received by the Smeaton Grange Waste Recycling and Transfer Facility will be from businesses, the government and the public. Waste sources will include public infrastructure construction projects and developments, largely from areas within the South West Growth Centre that extends from north of the site to Badgerys Creek. Waste will be brought to the facility by skip bin operators, construction and waste removal contractors' trucks and by car-pulled trailers. Municipal solid waste (eg household waste) will not be accepted.

Benedict Recycling has not entered into any contracts to receive waste at the facility given that it has not been approved. Other Benedict Recycling facilities receive wastes for recycling from a range of major infrastructure projects such the M2 - Motorway Upgrade, WestConnex and NorthConnex projects.

A.2 Outgoing materials

The DPE requested information on the following:

> the location of landfills / recycling facilities the waste will be delivered to

[1] Camden Council 2016a, Growth Centres SEPP. Viewed at http://www.camden.nsw.gov.au/development/plans-and-policies/growth-centres-sepp/ viewed on 22 September 2016.
[2] Camden Council 2016b, Waste Management Facility. Viewed at http://www.camden.nsw.gov.au/environment/waste-environment/waste-management-facility/ viewed on 22 September 2016.

Sorted recyclable materials will be dispatched to a range of locations that will include:

- Benedict Recycling's facility in Chipping Norton (eg bricks, concrete, tiles, masonry and light residues);
- Benedict's soil and sand facility in Menangle (timber and fines); and
- other recycling facilities on a commercial basis.

The portion of wastes that cannot be recovered through recycling will be sent to an EPA licensed facility for disposal. It is anticipated that this will constitute 10–20% of material received. The facilities used will be determined on a commercial basis.

3 Response to key issues regarding processing areas

The DPE requested the following:

> provide a rationale for not fully enclosing the processing area given the site's close proximity to sensitive receivers

Preliminary site design considered a range of potential site arrangements to allow the site to operate safely and efficiently. The design was modified iteratively as the EIS was prepared, for example by the inclusion of taller fences to minimise noise levels at receivers.

Trucks delivering waste need clear access to the receivables area within the main processing shed. This will be achieved by constructing a shed with one open side. The open side faces the rest of the site. The loudest activities on the site will occur within the shed (see Table 6.1 of the Noise Impact Assessment, EIS Appendix F).

Trucks delivering waste need clear access to the receivables area within the main processing shed. This will be achieved by constructing a shed with one open side facing the rest of the site. The loudest activities on the site will occur within the shed (see Table 6.1 of the Noise Impact Assessment, EIS Appendix F).

The use of a fully enclosed shed would mean that:

- additional external and internal areas would be required for dedicated entry and exit points from the shed;
- the shed would need to be more centrally located on the site to allow separated shed entry and exit points;
- a larger internal area would be required to allow trucks to manoeuvre around stockpiles within the shed;
- there would be less external space to allow onsite vehicle stacking during busy periods so queuing outside of the gates would be far more likely - it is very unlikely with the proposed site configuration (see RTS Figure 3.1); and
- the clear sight lines around the site, as proposed, would be broken by the walls of the shed, reducing site safety.

A "loading dock" arrangement where trucks reverse to a portal in a building wall would be not suitable because trucks need to be able to deliver waste by tipping and to be filled by side loading.

Residences will be shielded from noise levels that exceed project specific noise levels 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 (see RTS Figure 1.1).

Air quality management are described in EIS Table 7.1. As described in EIS Section 6.2.2, negligible air quality impacts are predicted from the facility.

With the exception of the noise level described in RTS Section 3.1.1, the noise and air quality criteria will be achieved for the proposed site layout, ie with the side of the shed that faces the rest of the site open. If the shed was to be enclosed on this fourth side, the site layout would need complete revision and the site would operate with reduced capacity and decreased safety. This is not justified given the predicted impact levels.