04 December 2015

The Director General
Department of Planning
GPO Box 39
Sydney NSW 2000

Attention: Mr Chris Ritchie

Dear Chris

STATE SIGNIFICANT DEVELOPMENT
EXISTING RESOURCE RECOVERY FACILITY 13 PEMBURY ROAD, MINTO

We are writing on behalf of Minto Recycling Pty Ltd (the Proponent) in relation to an existing waste or resource recovery facility at 13 Pembury Road, Minto (defined as Lot 1 in DP 1013852). The purpose of this letter is to request that the Secretary-General issue the environmental assessment requirements for the preparation of an Environmental Impact Statement (EIS) to enable an increase in the waste handling capacity of the facility, as described in this submission.

The existing facility is currently operating under an approval granted by Campbelltown City Council on 14 December 2004, as amended (Council ref DA No. 1/2002) for a 'junkyard', as defined in the Campbelltown Local Environmental Plan, 2002, and is described in subsequent modifications as a 'waste transfer station'.

The facility is currently approved to handle 30,000 tonnes per annum of waste. The Proponent is seeking to increase the quantum of waste material that can be handled at the existing facility to 300,000 tonnes per annum. Based on the intended operations, the facility will be most appropriately characterised as a resource recovery facility.

The proposal seeks to operate in accordance with the principles of ecologically sustainable development through increased capacity of resource recovery and the recycling of products that may otherwise have been diverted to the landfill.

Minto Recycling is one part of a group of companies known as Bingo Industries. Bingo Industries is the largest skip bin business in New South Wales with an extensive range of waste collection services including household waste, building and construction waste and commercial and industrial waste. These services are supported by operations that include resource recovery centres, including the subject site. Bingo Industries holds AS/NZ4801 accreditation for workplace health and safety (WHS) and has ISO14001accreditation for environmental (E) management standards.

The site is zoned 4(a) General Industry under the Campbelltown (Urban Areas) Local Environmental Plan 2002 (CLEP 2002) and IN1 General Industrial under Draft Campbelltown Local Environmental Plan 2014. In accordance with Division 23, subclauses (1) and (2) of State Environmental Planning Policy (Infrastructure) 2007, development for the purpose of a resource recovery facility may be carried out on land zoned 4(a) General Industry and proposed IN1 General Industrial zone.

In accordance with clause 8 of State Environmental Planning Policy (State and Regional Development) 2011, development is declared to be State Significant development for the purposes of the EP&A Act if, among other provisions, the development is specified in Schedule 1 or 2 of the State and Regional Development SEPP.

Clause 23 of Schedule 1 of the State and Regional Development SEPP relates to waste and resource management facilities and states:

23 ***Waste and resource management facilities***

(1) Development for the purpose of regional putrescible landfills or an extension to a regional putrescible landfill that:
- *(a) has a capacity to receive more than 75,000 tonnes per year of putrescible waste, or*
- *(b) has a capacity to receive more than 650,000 tonnes of putrescible waste over the life of the site, or*
- *(c) is located in an environmentally sensitive area of State significance.*

(2) Development for the purpose of waste or resource transfer stations in metropolitan areas of the Sydney region that handle more than 100,000 tonnes per year of waste.

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

(4) Development for the purpose of waste incineration that handles more than 1,000 tonnes per year of waste.

(5) Development for the purpose of hazardous waste facilities that transfer, store or dispose of solid or liquid waste classified in the Australian Dangerous Goods Code or medical, cytotoxic or quarantine waste that handles more than 1,000 tonnes per year of waste.

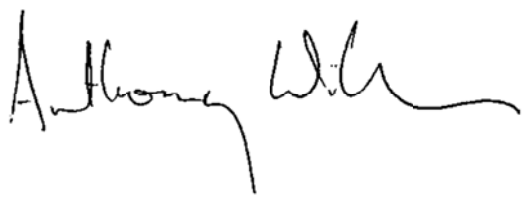
(6) Development for the purpose of any other liquid waste depot that treats, stores or disposes of industrial liquid waste and:
- *(a) handles more than 10,000 tonnes per year of liquid food or grease trap waste, or*
- *(b) handles more than 1,000 tonnes per year of other aqueous or non-aqueous liquid industrial waste* (our emphasis).

The proposed resource recovery facility will handle up to 300,000 tonnes of waste per year and clearly satisfies the criteria in Clause 23 in Schedule 1.

To assist in determining the Secretary's requirements relating to the preparation of the EIS, this letter contains a background document that provides an outline of the existing site operations, sets out the scope of the proposed development and the key environmental and planning issues associated with the proposal. It also describes the site and surrounds.

Should you have any queries in relation to this matter, please do not hesitate to contact the undersigned on 4928 7600.

Yours sincerely,



Anthony Williams
Senior Planner

PRELIMINARY ENVIRONMENTAL ASSESSMENT
WASTE RESOURCE TRANSFER STATION

1.0 THE SITE AND LOCALITY

1.1 The Site

The site comprises an area of 8,957 sqm, is legally described as Lot 1 in DP 1013852 and known generally as 13 Pembury Rd, Minto. The site is located approximately 50 km southwest of Sydney Central Business District and 5 km northeast of Campbelltown commercial centre (refer to Location in **Figures 1** and **2**).

The site is located within the Minto Industrial Estate, and as such is surrounded by other industrial and light industrial uses (manufacturing, storage and warehouses) and is directly adjacent to the Bow Bowing Canal. Beyond the Minto Industrial Estate, there is a mixture of low and medium density residential allotments, with the closest residential receiver found approximately 400m from the site.

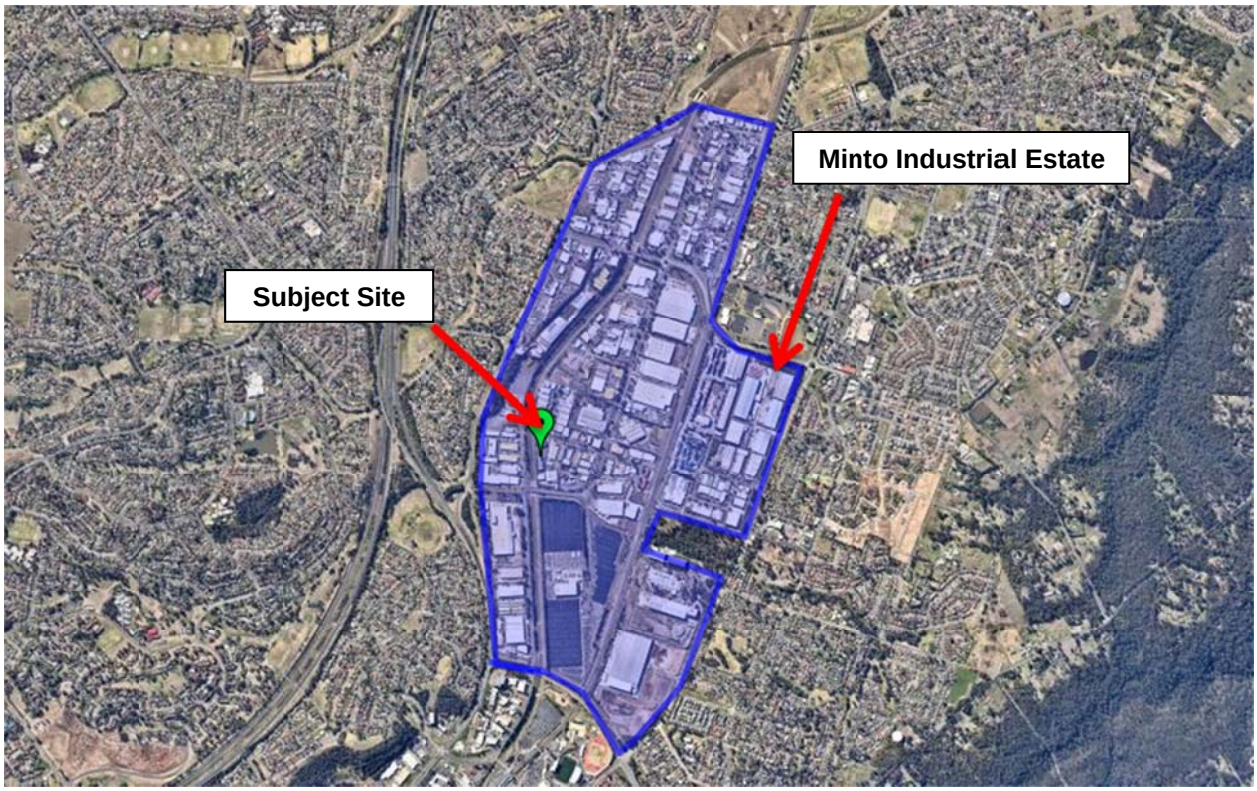


Figure 1 – Minto Industrial Estate Region

Figure 2 – Subject Site Aerial

1.2 Legal Description

The site's legal description and area is detailed in **Table 1** below.

Table 1 – Legal description, site area and land ownership

Property Description	Area (sqm)
Lot 1 in DP 1013852	8,957

The site is owned jointly by William Filipoppoulos and Thomas Filipoppoulos.

1.3 Approvals and Current Operation

On 14 December 2004, the Development Application (DA) was approved for the development of a junkyard on the subject property. The landowner has since modified the approved development as follows with Campbelltown City Council:

Table 2 – Development Application Approvals

Condition	Application Ref.	Amendments	Lodged Date	Approved Date
Section 96(2)	1/2002/DA-DE/A	Amend landscape strip, amend turning circle, relocate building 3m, amendment to car parking, relocation of weighbridge and construction of 5m high wall masonry fence along eastern boundary.	23 Feb 2005	8 Mar 2005
Section 96(2)	1/2002/DA-DE/B	Construct additional weighbridge, relocation of shed 'A', relocation of two car parking spaces.	11 Apr 2006	11 Apr 2006
Section 96(2)	1/2002/DA-DE/C	Increase handling capacity of waste transfer station from 15,000t p/a to 30,000t p/a.	24 Dec 2007	29 May 2008
Section 96(1A)	1/2002/DA-DE/D	Amend location of front fence.	29 May 2008	29 May 2009

The current operation as approved on 29 May 2009 handles up to 30,000 tonnes per annum of non-putrescible waste. Existing site improvements are illustrated in **Attachment A**.

Only general solid waste (non-putrescible) is currently accepted at the existing facility. The existing facility separates suitable non-putrescible waste into different recyclable products, with the exact proportion of these recyclable products being dependent upon the waste characteristics and market conditions.

Waste is sorted using equipment such as mobile loaders and excavators and manually by hand. Materials extracted during the process stage are sorted into separate designated bays (i.e. wood, plastics, metal). Any residual non-conforming waste, or recyclable material without a viable market, is transferred to a licensed landfill.

Material stockpiles are limited to seven (7) storage bays and are to not exceed four (4) metres in height in line with the requirements of the current Notice of Determination.

2.0 STATUTORY AND STRATEGIC PLANNING CONTEXT

The following key state legislation and planning instruments currently apply to the site:

- *Environmental Planning and Assessment Act, 1979;*
- *Protection of the Environment Operations Act, 1997;*
- State Environmental Planning Policy (State and Regional Development, 2011);
- State Environmental Planning Policy (Infrastructure, 2007);
- State Environmental Planning Policy 33 – Hazardous and Offensive Development;
- Campbelltown (Urban Area) Local Environmental Plan 2002
- Draft Campbelltown Local Environmental Plan 2014.

2.1 Existing and Proposed Zoning

The site is zoned 4(a) General Industry under the Campbelltown (Urban Areas) Local Environmental Plan 2002 (CLEP 2002) and IN1 General Industrial under Draft Campbelltown Local Environmental Plan 2014. In accordance with Division 23, subclauses (1) and (2) of State Environmental Planning Policy (Infrastructure) 2007, development for the purpose of a resource recovery facility may be carried out on land zoned 4(a) General Industry and proposed IN1 General Industrial zone.

Figures 3 & 4 provided below show the zoning of the site and surrounds under the current LEP and Draft LEP respectively.

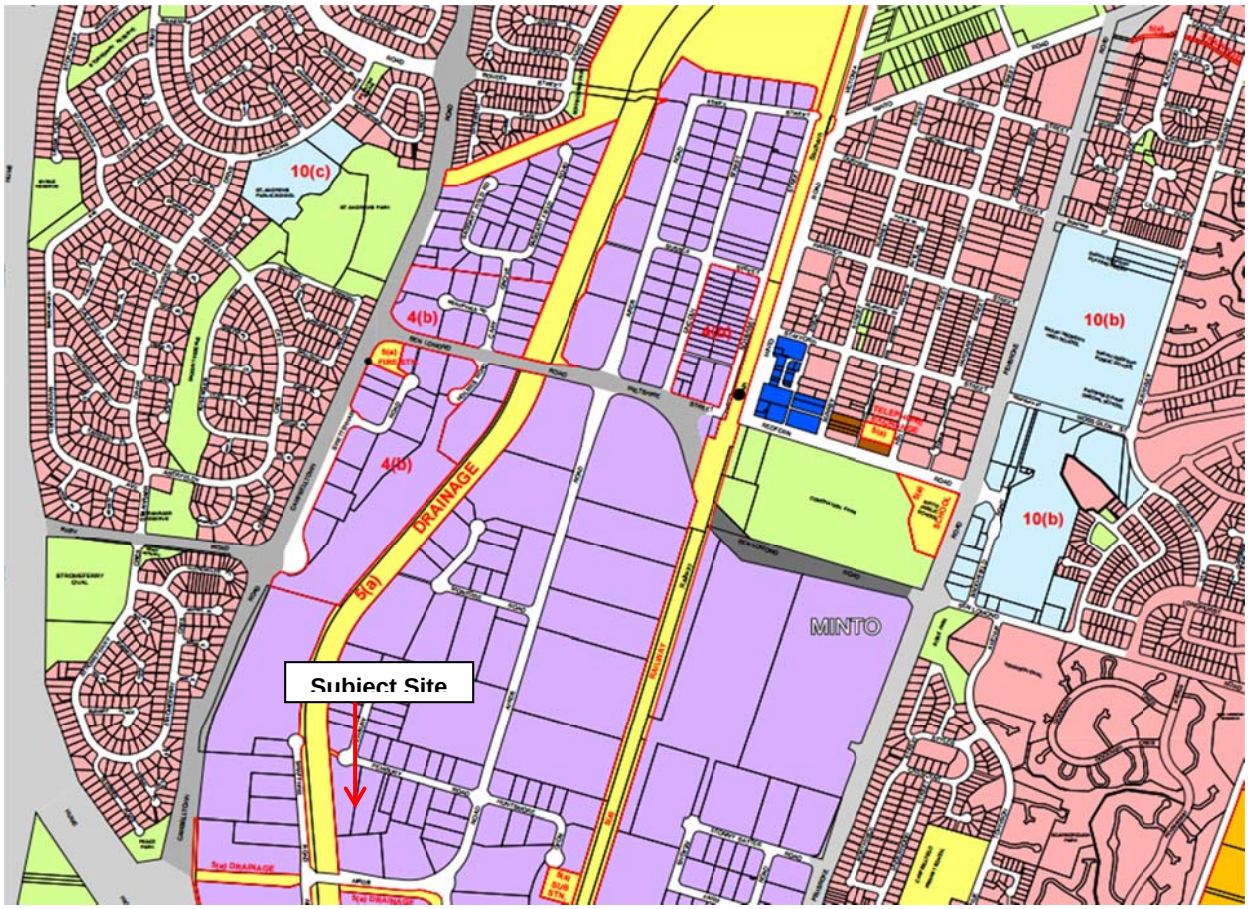


Figure 3 – Campbelltown (urban areas) Local Environmental Plan 2002 – Zoning Extract

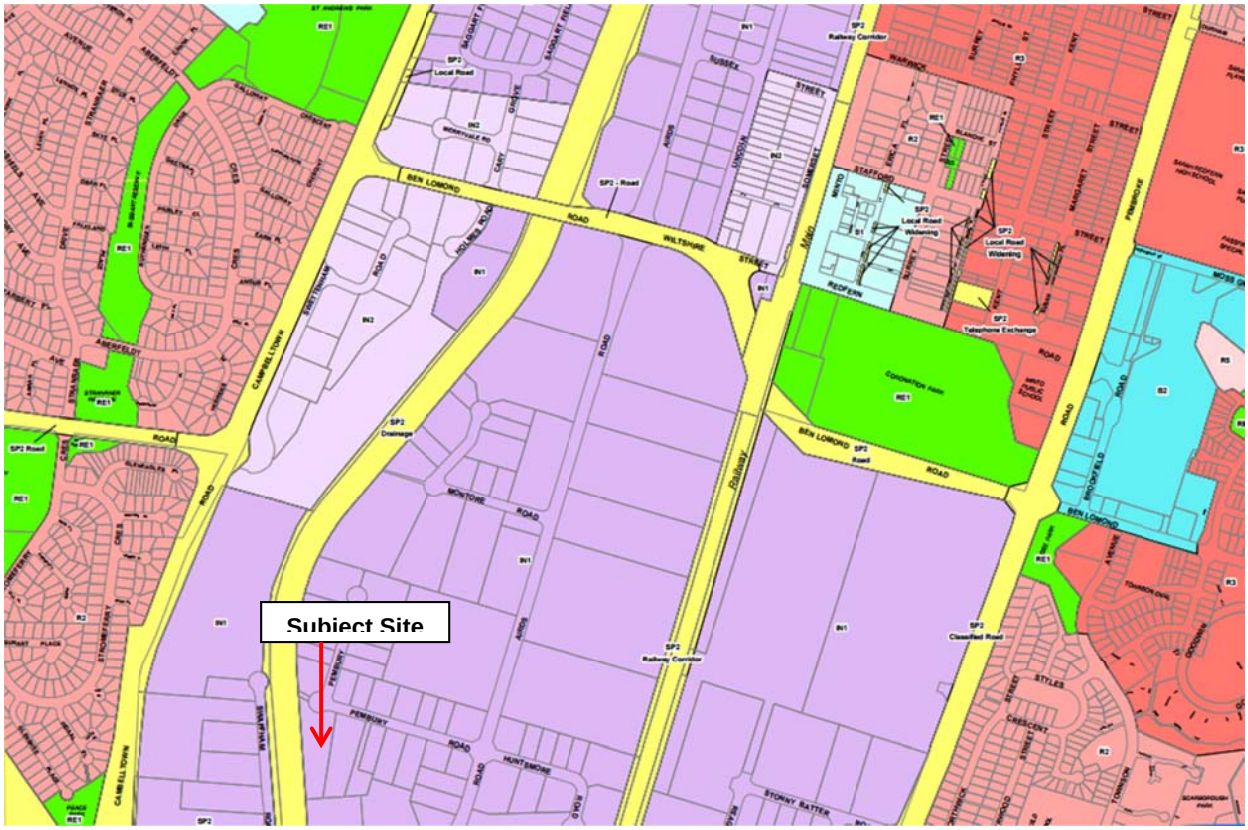


Figure 4 – Draft Campbelltown Local Environmental Plan 2014 – Zoning Extract

3.0 THE PROJECT

3.1 Overview

The proposal will seek to utilise existing improvements within the site. Alterations and additions to existing structures on the site may be proposed. A description of any proposed works to existing structures on the site and accompanying plans will be documented and assessed as part of the EIS. The proposal will, also involve the installation of new recycling equipment and pollution control equipment.

A predicted breakdown of the 300,000 tonnes of waste as a percentage is provided below.

- 2% wood waste
- 2% non-chemical waste from manufacturing
- 1% asphalt
- 10% soils
- 0.5% paper and cardboard
- 0.5% glass, plastic, rubber, plasterboard etc.
- 2% household waste from clean up
- 2% office and packaging waste
- 5% VENM
- 75% building and demolition waste

It should be noted that 95% of waste is predicted to be received as mixed waste with the remaining 5% comprising brick and concrete, soils or VENM not mixed with other waste types. **Attachment B** provides further detail on the proposed waste streams to be handled on site.

The proposed amendments to the existing facility are set out below:

Table 3– Approved and Proposed Development for 13 Pembury Rd, Minto

Approved Development	Proposed Amendment
Resource Recovery Operations	
Site area: 8,957m^2	No change
Handling	
30,000 tonnes per annum	300,000 tonnes per annum
Material Storage	
Unlimited	No change
Hours of Operation	
Recycling Operations	
6am - 7pm Monday to Saturday	6am -10pm Monday to Saturday
Transport (truck movements and deliveries to and from the site)	
Between 6am – 7pm Monday to Saturday	24 hour access, Monday to Saturday for loading and unloading.

Approved Development	Proposed Amendment
Car / Truck Parking	
15 Car Parking Spaces	15 Car Parking Spaces
Truck Parking Spaces provided on site outside of operating hours.	Truck Parking Spaces provided on site outside of operating hours.
Number of employees	
10	12 (increase of 2 employees)

4.0 PRELIMINARY ENVIRONMENTAL ASSESSMENT

The key environmental and land use planning issues that have been identified as needing to be addressed in the EIS are:

- Stormwater Runoff, soil contamination and flooding;
- Transport, access and car parking;
- Noise and vibration;
- Hazards and Dangerous Goods;
- Air Quality;
- Waste Management; and
- Flooding.

4.1 Stormwater, Soil and Water

A stormwater management report was prepared by Connell Wagner Pty Ltd on 12 May 2003 formed part of the original EIS and addresses current stormwater management arrangements. An updated water cycle management strategy will be provided to assess any impacts associated with increasing the waste handling capacity on water cycle management. The updated report will advise on any additional measures required to manage stormwater, soil and water on site as a result of increasing the handling capacity of the facility.

The EIS will document how such measures can be incorporated into the development.

4.2 Transport, access and parking

Increasing the capacity of the facility will see an increase in heavy vehicle movements to an average of 150 movements per day. No alterations to the internal manoeuvring, loading / unloading and car parking arrangements are proposed.

The EIS will be accompanied by a comprehensive Traffic Impact Assessment and provide details surrounding the suitability of such arrangements with particular regard given to:

- The current and future capability of local and regional road infrastructure;
- The type and frequency of heavy vehicles proposed to utilise the site; and
- The suitability of the proposed site layout to accommodate the predicted heavy vehicle movements from the site.

The EIS will include any recommendations to mitigate the likely impacts of the development on the road network including manoeuvring arrangements and operational management plans. Appropriate consultation with NSW RMS will be undertaken to satisfy the requirements of SEPP (Infrastructure) 2007.

4.4 Noise and vibration

A noise assessment was previously conducted by RSA Acoustics in April 2003 to accompany the DA for the development of the waste transfer station. An updated noise and vibration assessment is required for the purpose of assessing the impacts to the site and surrounding area as a result of increasing the handling capacity of the site from 30,000 tonnes per annum to 300,000 tonnes per annum.

The EIS will document how such measures will be incorporated into the development,. The EIS will also provide details surrounding the suitability of adopting such measures during both the construction and operational phases of the project.

4.5 Hazards and Dangerous Goods

As a part of day to day activities the existing and proposed operations involve the use and storage of hazardous and dangerous goods, namely Diesel and LPG. A preliminary risk screening and hazard assessment will be undertaken to consider whether the development is "potentially hazardous", consider the cumulative risks for the proposed development and determine whether any further assessment is required based on the screening thresholds contained in *Applying SEPP 33 - Hazardous and Offensive Development Application Guidelines* and thus should not be subject to any further studies.

This assessment will form part of the EIS and will confirm the types, quantities, storage locations and storage conditions of any dangerous goods proposed to be stored on site. The EIS will also confirm the proposed frequency transport movements relating to dangerous goods. Where any exceedances to thresholds are identified, the EIS will be supported by a comprehensive *Preliminary Hazard Analysis (PHA)* to determine the cumulative risks associated with the proposal.

4.6 Air Quality

An air quality report was prepared by Holmes Air Sciences (on behalf of Connell Wagner Pty Ltd) in May 2003 to accompany the DA for the waste transfer station. An updated air quality report will be produced in order to assess air quality related issues (such as dust, particulate and odour emissions) as a result of increasing the transfer station's handling capacity.

The EIS will document how such measures will be incorporated into the development. The EIS will also provide details surrounding the suitability of adopting such measures during both the construction and operational phases of the project.

4.7 Waste Management

Once fully operational, the facility will retain capacity to handle a number of general solid waste streams (non-putrescible). A detailed list and description of the waste streams is provided in **Attachment B.** The EIS will document how such waste streams are to be managed on site and in the context of regulatory obligations under the *POEO Act, 1997* and the *Waste Avoidance and Resource Recovery Act, 2001.*

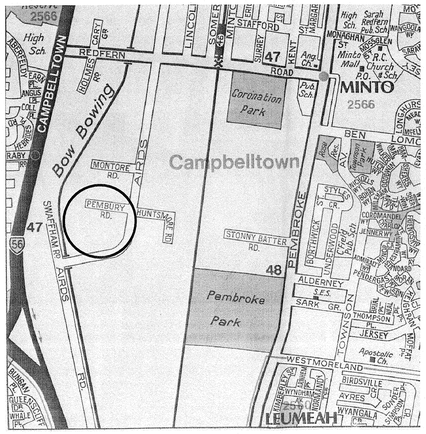
General mitigation measures concerning waste management (visual, hazards and fire, noise, vibration etc) will be incorporated into the detail design of the waste resource transfer station to ensure impacts on future surrounding development are not significant.

4.8 Flooding

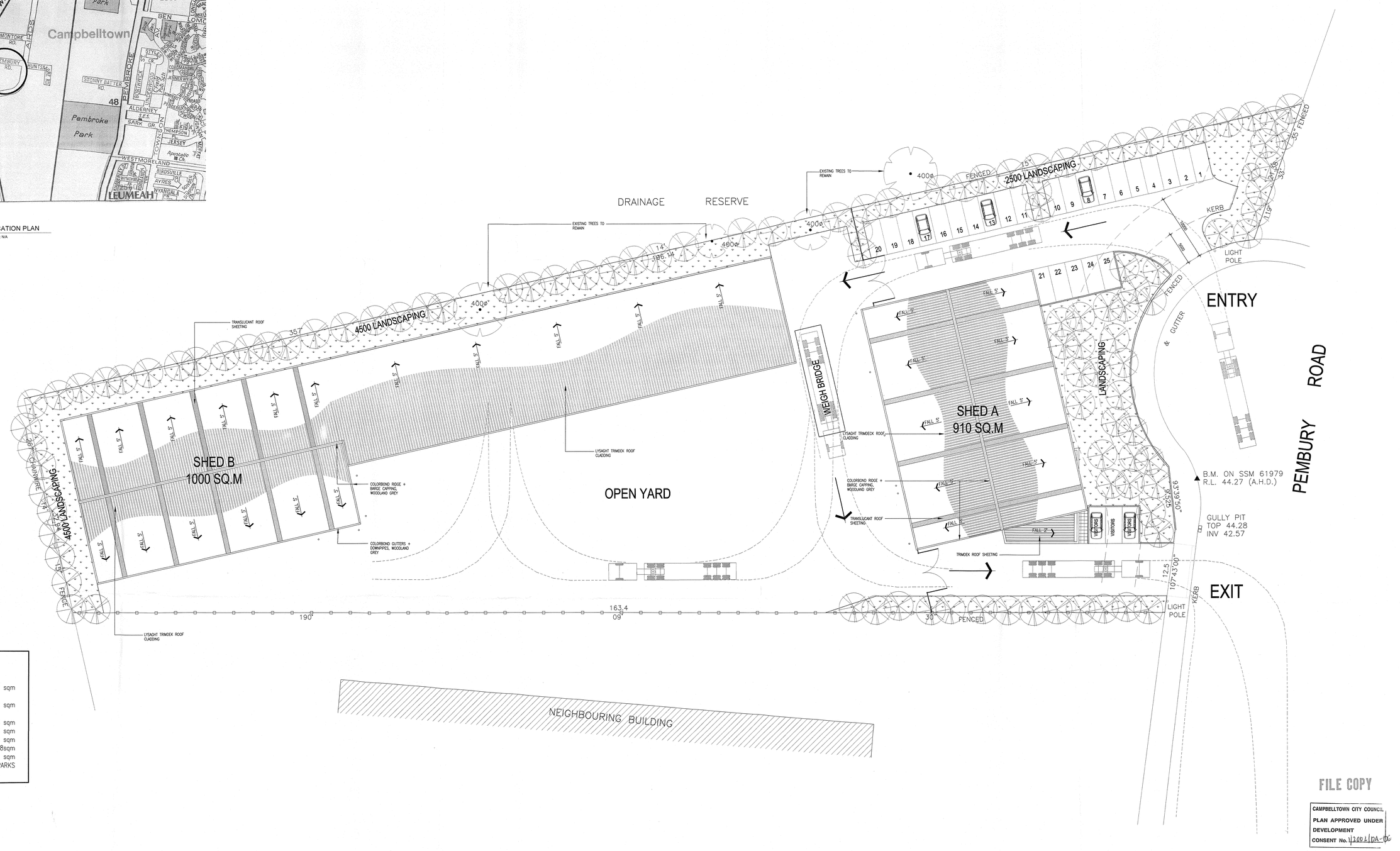
The site is located within an area that has been identified as being at risk of being affected by the 100 year ARI flood. While the proposal does not seek to amend the existing site configuration, levels, development footprints or stockpile locations the EIS will document how the effect of floodwaters entering the site will be managed to mitigate impacts associated with stockpiling of product, damage to goods or equipment and occupant safety.

It is noted that the existing development consent (E1/2002) includes conditions of consent aimed at mitigating the likely impacts of flooding. The intent and practicability of these conditions of consent will be addressed in the EIS.

ATTACHMENT A – EXISTING SITE ARRANGEMENTS



01 LOCATION PLAN
SCALE: N/A



SITE CALCULATIONS

SITE AREA	8,957 sqm
GROUND FLOOR OFFICE AREA	60 sqm
SHED A WAREHOUSE + AMENITIES AREA	910 sqm
SHED B WAREHOUSE AREA	1,000 sqm
COVERED STORAGE	1,100 sqm
LANDSCAPING	1,598sqm
FLOOR SPACE RATIO	0.34:1
CARARKING SPACES PROVIDED	28 CARPARKS

FILE COPY

CAMPBELLTOWN CITY COUNCIL
PLAN APPROVED UNDER DEVELOPMENT
CONSENT No. 1200/DA-DE

QTY	ISSUE	DATE	TO	QTY	ISSUE	DATE	TO
1	–	11.10.04	PLANNERS				
1	A	12.11.04	PLANNERS				
3	A	23.11.04	PLANNERS				

A 12.11.04 SHED A + COVERED STORAGE AREA REVISED
REV DATE AMENDMENT
CONTRACTORS ARE TO VERIFY DIMENSIONS ON SITE BEFORE COMMENCING WORK.
ANY DIMENSIONS OR DISCREPANCIES ARE TO BE NOTIFIED TO THE ARCHITECT

AUSSCRAP

CLIENT
AUSSCRAP

ARCHITECT
SMITH CHAN ROBERTSON Ph: 9698 4844 Fax: 9698 5844

PLANNERS
GARY SHIELS & ASSOCIATES Ph: 9362 3364 Fax: 9362 3073

HYDRAULIC ENGINEER
CONNELL MOTT MacDONALD Ph: 9890 4100 Fax: 9890 3558

PROJECT
AUSSCRAP
11 PEMBURY ROAD,
MINTO NSW.

JOB No 2502 | DRAWN ZV | SCALE 1:200 @ A0
DATE 18.08.04 | CAD FILE 2502-ADA-1001

DRAWING TITLE
SITE + ROOF PLAN

DRAWING NUMBER
ADA-1001

REVISION
A

729 ELIZABETH STREET WATERLOO NSW 2017
TEL (02) 9698 4844 FAX (02) 9698 5844
SMITH CHAN ROBERTSON ARCHITECTS

ATTACHMENT B – PROPOSED WASTE STREAMS

Waste	Description	Activity	Other Limits
Any waste received on site that is below licencing thresholds in Schedule 1 of the POEO Act, as enforced from time to time		-	
General solid waste (non-putrescible)	Virgin excavated natural material as defined in Schedule 1 of the POEO Act, in force from time to time	Waste Processing (non-thermal treatment) Waste Storage *Resource Recovery*	
General solid waste (non-putrescible)	Building and demolition waste as defined in Schedule 1 of the POEO Act, in force from time to time	Waste Processing (non-thermal treatment) Waste Storage *Resource Recovery*	
General solid waste (non-putrescible)	Soil that meet the CT1 thresholds for general solid waste in Table 1 of the Waste Classification Guidelines as in force from time to time with the exception of the maximum threshold values for contaminants specified in the 'Other Limits' column	Waste Processing (non-thermal treatment) Waste Storage *Resource Recovery*	Arsenic 40mg/kg; Cadmium 2mg/kg; Copper 200mg/kg; Mercury 1.5mg/kg; Zinc 600mg/kg; Petroleum Hydrocarbons C6-C9 150mg/kg; Petroleum Hydrocarbons C10-C36 1600mg/kg; Polycyclic aromatic hydrocarbons 80mg/kg Polychlorinated biphenyls (individuals) 1mg/kg. No Acid Sulfate Soils or potential Acid Sulfate Soil is to be received at the Premises. Soil thresholds will be subject to review from time to time
General solid waste (non-putrescible)	Asphalt waste (including asphalt resulting from road construction and waterproofing works as defined in Schedule 1 of the POEO Act, in force from time to time	Waste Processing (non-thermal treatment) Waste Storage *Resource Recovery*	
General solid waste (non-putrescible)	Office and packaging waste (including paper, plastics, glass, metal, timber) that is not contaminated or mixed with any other type of waste	*Waste Processing (non-thermal treatment)* *Waste Storage* *Resource Recovery*	
General solid waste (non-putrescible)	Non -chemical waste generated from manufacturing and services (including metal, timber, paper, ceramics, plastics, thermosets and composites)	*Waste Processing (non-thermal treatment)* *Waste Storage* *Resource Recovery*	

Waste	Description	Activity	Other Limits
General solid waste (non-putrescible)	Household waste from municipal clean up that does not contain food as defined in Schedule 1 of the POEO Act, in force from time to time	Waste Processing (non-thermal treatment) Waste Storage *Resource Recovery*	Must be removed from premises within 48 hours of arrival. Cannot be stored on Sundays or public holidays
General solid waste (non-putrescible)	Garden waste as defined in Schedule 1 of the POEO Act, in force from time to time	Waste Processing (non-thermal treatment) Waste Storage *Resource Recovery* *Composting*	Composting operations are limited to size reduction of garden waste by shredding, chipping, mulching or grinding. No aerobic or anaerobic biological conversion of organics into humus-like products is to take place. As specified in each particular Resource Recovery Order
General or Specific Exempted Waste	Waste that meets all conditions of a resource recovery order under Clause 91 of the Protection of the Environment Operations (Waste) Regulation 2014	As specified in each particular Resource Recovery Order	
General solid waste (non-putrescible)	Glass, *plastic, rubber, plasterboard, ceramics, bricks, concrete or metal*	*Waste Processing (non-thermal treatment)* *Waste Storage* *Resource Recovery*	
General solid waste (non-putrescible)	*Paper or cardboard*	*Waste Processing (non-thermal treatment)* *Waste Storage* *Resource Recovery*	
General solid waste (non-putrescible)	*Wood waste*	*Waste Processing (non-thermal treatment)* *Waste Storage* *Resource Recovery*	
General solid waste (non-putrescible)	*Any mixture of* wastes *referred to above*	*Waste Processing (non-thermal treatment)* *Waste Storage* *Resource Recovery*	
General Solid Waste (non-putrescible)	*Bulky* goods *waste containing building de-fit fittings, fixtures and furniture that* is *not contaminated or mixed with any other type of waste*	*Waste Processing (non-thermal treatment)* *Waste Storage* *Resource Recovery*	
General solid waste (non-putrescible)	*Waste collected by, or on behalf of local councils from street sweepings*	*Waste Processing (non-thermal treatment)* *Waste Storage* *Resource Recovery*	
General solid waste (non-putrescible)	*Grit, sediment, litter,* gross *pollutants collected in and removed from stormwater treatment devices and or stormwater management* systems *that have been dewatered* so *that they do not contain free liquids*	*Waste Processing (non-thermal treatment)* *Waste Storage*	

Waste	Description	Activity	Other Limits
General solid waste (non-putrescible)	*Grit and screenings from potable water and water reticulation plants that have been dewatered so that they do not contain free liquids*	*Waste Processing (non-thermal treatment)* *Waste Storage*	
General solid waste (non-putrescible)	*Non putrescible vegetative waste from agriculture, silviculture or horticulture*	*Waste Processing (non-thermal treatment)* *Waste Storage*	
General solid waste (non-putrescible)	*Cured concrete waste from a batch plant*	*Waste Processing (non-thermal treatment)* *Waste Storage*	