



Mr Sam Coles
Borg Manufacturing Pty Limited
2 WELLA WAY
SOMERSBY NSW 2250

09/04/2021

Dear Mr Coles

**St Marys Resource Recovery Facility (Borg) (SSD-10474)
Response to submissions**

The exhibition of the development application for the above proposal - including the Environmental Impact Statement (EIS) ended on 01 Apr 2021. We have placed all submissions on the Department's website at <https://www.planningportal.nsw.gov.au/major-projects/project/37091>.

We now require you to formally respond to issues raised in the submissions, as required under clause 82 of the *Environmental Planning and Assessment Regulation 2000*. We request you provide a response within two months of the date of this letter. You are also requested to submit additional information that addresses the issues identified in **Attachment 1**.

Please note, Fire and Rescue NSW were not able to provide their advice at the time of writing. Their comments will be forwarded to you once they have been received.

Please lodge your response by progressing the application on the major projects planning portal <https://majorprojects.planningportal.nsw.gov.au/>.

Note that the time between the date of this letter and the date the Secretary receives your response are not included in the period of 'deemed refusal', under clause 113(7) of the *Environmental Planning and Assessment Regulation 2000*.

If you have any questions, please contact David Schwebel on 9274 6400 or david.schwebel@planning.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'C. Ritchie'.

Chris Ritchie
Director
Industry Assessments

as delegate for the Planning Secretary

Attachment 1

In order to progress the Department's assessment, additional information is required including, but not limited to, the following:

1. Plans

- The tip and spread area for the wood waste appears to overlap with the storage bays and truck manoeuvring area. Please clarify whether waste tipped in this area will impact on the storage capacity of these bays or impede truck movement through the building.
- Section 8.2.5 of the EIS identifies that the chemical storage cabinet will be located inside the warehouse, however, the cabinet appears to be shown outside the warehouse on the Proposed Ground Floor Plan (Drawing No. DA03).

2. Waste Management

- Table 3.1 of the Waste Management Plan (WMP) suggests the wheel wash will be in-ground, however the EIS identifies the proposed wheel was as above-ground and portable. Please clarify and confirm whether any excavations will be required to install.
- The storage capacity for unprocessed wood waste identified in the Table 1 of the EIS and Table 3.6 of the WMP is conflicting, including the dimensions of the storage bays. The dimensions of the unprocessed storage bays in Table 1 also conflicts with some dimensions shown on the plans. Ensure all dimensions and capacities are consistent between the plans, EIS and WMP.
- It is noted that the storage capacity in Tables 1 and 2 of the EIS and Table 3.6 of the WMP are based on heights of 4m. However, Section 3.2.4 of the WMP states that stockpiles will be a maximum 3m high. Recalculate storage capacity based on the maximum 3m height of stockpiles.
- Clarify the purpose of the spare wood storage identified in Table 3.6 and whether this is the two storage bays identified on the plans as "wood for particle board".
- Identify on the plans where the scrap metal skip bin identified in Table 3.6 of the WMP will be located.
- Identify where non-conforming waste that is found during processing will be stored on site prior to removal and how often it will be removed.
- Clarify the sources of other metal waste (not sourced during the processing of wood waste) and how it will be brought to site.
- Table 3.4 of the WMP identifies the development will have an output of 11,700 tpa of scrap metal. This conflicts with the 10,000 tpa of metal waste proposed to be processed in the EIS and Table 3.3 of the WMP.
- The EIS doesn't include a throughput analysis of the proposed 10,000 tpa of metal waste (as in Tables 1 and 2). If the 10,000 tpa of metal waste is to be processed on site over 355 days in a year (as per daily throughput analysis in Tables 1 and 2), then this equates to

approximately 28 tonnes per day. Clarify how this amount of waste will be stored on site if there is only one skip bin with a capacity of 2.4t, as identified in Table 3.6 of the WMP.

- Appendix 1 of the WMP has not been provided.

3. Traffic

- It is noted that the Traffic Impact Assessment (TIA) states that the site is serviced by a shared driveway with 21 Dunheved Circuit. It is also noted that the EIS proposes creation of an easement on 21 Dunheved Circuit to ensure vehicle access for the site. Please identify the use of the site at 21 Dunheved Circuit and how this may be impacted by the operation of vehicles servicing the development across the property. Provide swept paths for vehicles manoeuvring between the two sites. Please also clarify whether the proposed development can operate with heavy vehicles only using the driveway of the subject site (25 Dunheved Circuit).
- Section 3.2 of the TIA states that storage for 2,000-2,500 tonnes of material will be provided on site. This substantially exceeds the storage capacity identified in the EIS and WMP.
- Provide details on how processed material (including paper and metal) and residual waste will be collected from site, including types and numbers of vehicles. Clarify whether trucks dropping off material will then collect processed material prior to leaving the site or whether different trucks will be used to collect processed material.
- The TIA identifies that the proposed development will generate a total of 126 daily vehicle trips compared to 220 per day in 2016 (page 21). Please clarify why the vehicle count is decreasing while the proposed throughput is increasing from 18,000 tpa to 150,000 tpa.
- Tables 1 and 2 of the EIS identifies up to 25 daily inbound trucks delivering wood and plasterboard waste. Please clarify the breakdown of the other heavy vehicles predicted to be generated daily by the development, both delivering waste and collecting processed material (total 46 heavy vehicles in Table 4.3 of the TIA).
- It is noted that the TIA states that no visitor or accessible parking spaces will be provided (page 31), but one visitor and one accessible space is shown on the Proposed Traffic and Signage Plan (Drawing No DA04). Please clarify whether these spaces will be provided.
- Clarify whether there will be sufficient parking spaces to accommodate staff arriving on site during a shift change during a 'busy period' where there may already be 10 staff on site.
- Please clarify whether there is sufficient room in the warehouse building for heavy vehicles to manoeuvre, particularly when collecting processed material including from the gypsum silo and while front-end loaders or other machinery is in operation.
- Please clarify whether there is sufficient space on site for heavy vehicle circulation if there is a vehicle breakdown, including within the warehouse building.
- Clarify whether heavy vehicles can safely exit the site if vehicles are parked on the road in front of 21 Dunheved Circuit.
- Clarify whether any heavy vehicles will be parked or stored on site at any time.
- It is noted the TIA relies on traffic data from 2016. Provide further consideration of the current traffic conditions in the Dunheved Business Park, particularly the Ropes Crossing

Boulevard- Forrester Road-Links Road intersection during peak periods, including shift changes on site.

- Provide more detail on the timing of the construction of the proposed extension of Links Road to Christie Street identified in Section 4.4 of the TIA.

4. Air Quality

- Please clarify whether the Air Quality Impact Assessment considered emissions from open roller doors and the roof ridge vent.
- Please clarify whether the receipt and storage of potentially wet plasterboard would result in any unacceptable odour emissions.

5. Owner's consent

Provide landowner's consent for lodgement of the application.