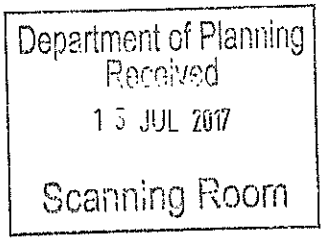
J & M Burrowes Superannuation Pty Ltd (ACN: 169221738)
As trustee for:

J & M Burrowes Superannuation Fund

Po Box 27, Hazelbrook NSW 2779

12th July, 2017

Director
Industry Assessments
NSW Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001



Dear Sir/Madam,

RE: APPLICATION FOR SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS (SEAR) FOR A PROPOSED WASTE RECYCLING AND TRANSFER FACILITY, PENRITH NSW 2750

I wish to object, most strenuously, to the proposed development for 46-48 Peachtree Road, Penrith put to your department by EMM on behalf of Benedict Recycling Pty Ltd.

I own the adjoining property, 44 Peachtree Road, Penrith.

Based on the information set out as follows it is my belief that the proposal should not proceed to the EIS Stage as the proposed use of the subject property is not in keeping with the current zoning of IN1 General Industrial. The project is outside of the parameters of this zoning in that it is a "hazardous & offensive" development which is prohibited within IN1 zoning.

My reasons for this rationale are set out as follows in the order in which the relevant points were addressed in EMM's letter to you dated 28th June, 2016 a copy of which is attached. My responses are in italics for clarity.

1. **Introduction** – *the claim that the development will be "State Significant" is not refuted as it is identified in the State and Regional Development SEPP, i.e. "waste management facilities".*

Email: burrowes@iinet.net.au Phone: 0425 344 648
ABN: 29 674 647 956

2. Site and Surrounds

2.1 "legally described as Lot 45 in DP 793931 which covers 4,367 square metres"....."The site was previously used as a metal recycling facility which is similar to the proposed development".

This is correct and the metal recycling, mainly cars at the site continues at the present time. However, the current scrap yard use is on a far, far smaller scale than that proposed by Benedict Recycling.

The site is zoned IN1 General Industrial under the Penrith Local Environmental Plan 2010.

This is also not refuted. This zoning is for Light Industrial and conforms with the current usage as light industrial coupled with commercial by owners and tenants in the area.

Activities include car repair workshops and similar occupations as well as commercial activities such as food outlets (McDonalds, Subway (directly opposite the proposed site), an hotel and retail sales. As an example our site has four separate small industrial units. The tenants carry out the following low key operations:

1. *An automotive rubber retailer with showroom.*
2. *A vehicle window tinting service where work is undertaken on site. This tenant could not possibly operate in a dust filled environment.*
3. *A mobile mechanic*
4. *A factory equipment relocator.*

The scale of the proposal by Benedict can only be described as Heavy Industrial which is totally unsuited to the area and prohibited under IN1 zoning.

2.2 The Surrounds

This is not refuted.

3. Proposed facility

No comment

3.1 Site Components

The scope of site components envisaged and described in detail by the proponent far exceed the limitations of the size of the site (4,367 sq metres). Other aspects of the site components have been dealt with elsewhere in this submission.

3.2 Site Operations

3.2.1 Waste receival

It is proposed "a total of 180,000 tonnes per year" *of waste (approximately 493 tonnes per day) will be received at the proposed site every year. This tonnage, if consistent with Benedict's other facilities and we assume it will be, will mainly be comprised of construction and demolition waste, commercial and industrial waste, excavated material such as sand and sandstone generated during bulk earthworks.*

Again, we stress this is not consistent with the size of the site nor the general current use of other sites in the surrounding area.

Further, it is stated that waste would be delivered by a variety of vehicles including "light vehicles – cars with box trailers and utilities", single axle heavy vehicles and skip bins and multiple axle heavy vehicles such as "trucks and dogs".

The "light vehicles" claim is a nonsense. This is not the type of facility which would be utilised by "Mums and Dads" with their box trailers in the area.

The type of waste deliveries outlined previously, coming as they do from both construction and demolition sites could only be delivered by large vehicles such as tip trucks or "B Doubles". Think WestConnex operations on Parramatta Road! These vehicles weigh up to 40 tonnes.
The proposal goes on to say "about 36,640 waste deliveries are expected annually with a daily average of about 87 deliveries by light vehicles and about 45 deliveries by heavy vehicles".

This statement is a total misnomer. No one could possibly predict, with any accuracy, the number and size of vehicles likely to enter the site. As previously stated, this proposed site would only, predominantly, be accessed by heavy vehicles from demolition and construction sites. Possibly 100 tip trucks including B Doubles as 3 ton trucks are not generally used on construction sites.

The proposal addresses site access via Castlereagh Road (which is a major heavy vehicle route) and Peachtree Road.

Peachtree Road is most definitely <u>not</u> suitable for heavy vehicles. A photo of Peachtree road leading up to the proposed site is attached for clarification.

In addition, the entire road would be totally blocked by large trucks queuing up to access the weighbridge prior to, and upon unloading at the site. Due to the site size possibly only one vehicle could be accommodated at any given time. The proponents are citing 132 (approximately) vehicle deliveries <u>per day</u>.

<u>Waste storage</u> is also addressed in the proposal. "Wastes will generally be stored on the hardstand prior to processing undercover in the waste processing shed".

Again, this statement is deliberately misleading. The hardstand area is 3250 square metres. If the site is 4369 square metres in total this would only allow an area of a ***mere 1119 square metres*** *for their "waste processing shed".*

The submission outlines a range of mobile plant to handle and process the waste. Further into the submission the cost of such plant is estimated to be around $975,000.00. This is a lot of plant and corroborates my contention that the site is simply too small for the scope of activity proposed.

3.2.3 Operating hours and workforce

Deliveries and despatches are proposed to be accepted during ludicrous operating hours Monday to Friday, Saturday and Sunday. This is a common rouse used in applications to overstate the actual hours they require, or expect to have approved, in an effort to get the maximum trading hours they can achieve. It is likely they would be happy to achieve similar hours as their numerous other recycling operations in NSW.

4. Preliminary Environmental review

Soils & Contamination - "the site is fully sealed with no exposed soils". Unable to verify.

Surface Water - 'The site is fully sealed". *Unable to verify. However there would certainly be contamination and storm water treatment necessary.*

Groundwater - 'The site is fully sealed". *Unable to verify. However, the fact that a "truck washdown facility" is planned confirms that the proponents expect significant amounts of soil and debris on site.*

Ecology - *No comment*

Roads & Traffic – "The site is accessible from Peachtree Road via Camden Castlereagh Road. Both roads are suitable for heavy vehicles".

*As previously stated Peachtree Road is definitely **not** suited to heavy vehicular traffic; particularly whilst trucks are awaiting entry to unload at the site. This would leave only a single lane for two way traffic using the road.*

Air Quality – "Some of the proposed activities have the potential to produce airborne dust".

*The activities proposed will most certainly produce **huge** amounts of dust which will flow on to the surrounding properties, particularly "crusher" dust with the possibility of potential asbestos dust as well.*
*The dust generated by this, and other types of activity cannot, in reality, be contained effectively despite irrigation systems and other mitigating measures. As an example the waste would have to first be dumped on the ground when delivered then transported by some type of on site plant to another location on the site. During these operations the waste would be **dry**.*

Over the years we have both witnessed, and undertaken, demolition and construction in our business operations. Despite the best intentions of the business owners staff rarely bother with dust mitigation measures. This is a sad fact of life unfortunately.

Noise – *This aspect has not been addressed in the proposal relying on further assessment in the EIS. Noise levels due to the truck movements, on site machinery operations and other activities **must** generate significant noise levels during all hours of operation.*

Visual, Aboriginal and historic heritage

Again the proponents have not dealt with this issue preferring to rely on further investigation and assessment in the EIS.

Hazards – "An above ground diesel tank (approx. 30,000 litre capacity) will be installed within a bund."

This is a massive sized, potentially lethal, tank full of hazardous inflammable fuel. The bunding required for such a tank would be difficult in its scope to envisage. The size of the fuel tank proposed in itself gives some indication of the plant that will be required to utilise it.

It is also stated that other hazardous materials will be stored and used on site, i.e. acetylene which is highly inflammable.

IN CONCLUSION:

The Zoning of this site is IN1. **Prohibited in this zone is "Hazardous or Offensive Industries".**

As outlined in my submission the proposed use of the site meets the criteria of being considered as both hazardous and offensive; particularly in this small pocket of light industrial and commercial operations.

The operations proposed on the site would better be described as a 'waste or resource transfer station'. This type of use does not appear in the permitted uses table in the IN1 zone and would be suited to a 'Heavy Industry' zoning.

Further, the size of the site is far too small for its intended use and would be better suited to a minimum site of at least 15,000 sq metres; more than three times the size of the proposed site in Peachtree Road. Similar in size to other Benedict facilities which operate on massive sites in relatively isolated areas around NSW.

As an example:

Chipping Norton facility – 14,150 square metres approximately
Mayfield West facility – 50,670 square metres approximately
Belrose facility – 59,270 square metres.

We are sure common sense will prevail and this application will be rejected on the basis of the information we have presented.

Yours faithfully
J & M BURROWES SUPERANNUATION FUND PTY LTD

J. L. BURROWES
Managing Director

Attachments:

Addendum 1. EMM's letter to the Department dated 28th June, 2016.

Addendum 2. Various photographs of Benedict's other facilities at Chipping Norton, Newcastle and Belrose facilities showing the scope of operations carried out by this company and the heavy onsite machinery used. These photos are readily obtainable from Benedict's website.

Addendum 3. Photo of Peachtree Road leading up to the subject site showing its unsuitability for the proposed operations.

Addendum 4. An aerial photo of the general Peachtree area with existing land uses.

Addendum 1 - 11 Pages

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28 June 2016

Executive Director
Major Project Assessments
NSW Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Re: Application for Secretary's environmental assessment requirements for a proposed waste recycling and transfer facility, Penrith, NSW

Dear Sir/Madam,

1 Introduction

This letter requests Secretary's environmental assessment requirements (SEARs) for a proposed waste recycling and transfer facility (the development) in Penrith, NSW (Penrith local government area). It has been prepared by EMM Consulting Pty Limited (EMM) on behalf of our client, Benedict Recycling Pty Limited (Benedict Recycling). As described below, the development will be state significant development (SSD).

2 Site and surrounds

2.1 The site

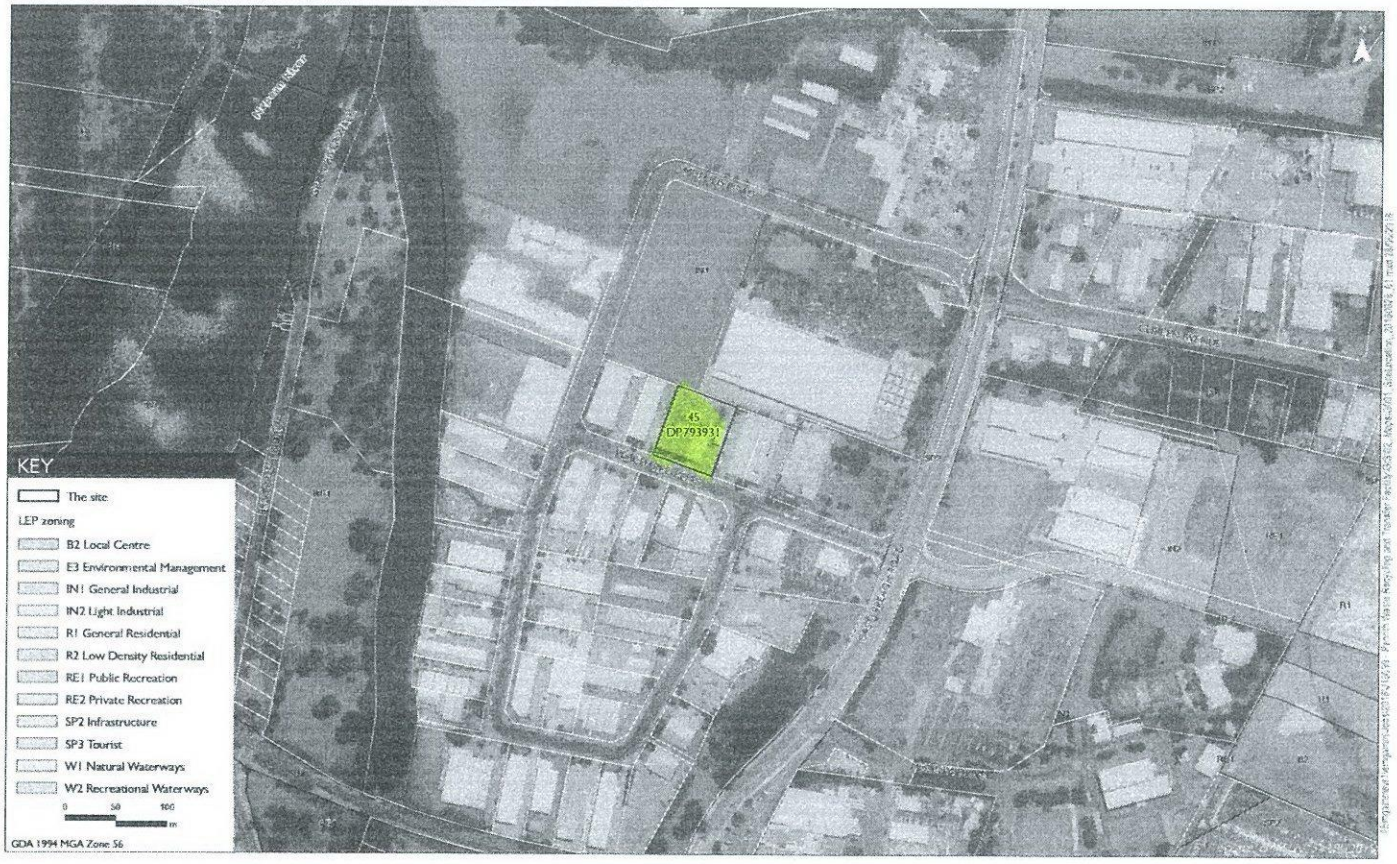
The site is at 46–48 Peachtree Road in Penrith NSW, and is legally described as Lot 45 in DP 793931, which covers 4,367 m^2 (Figure 1). The site is flat (approximately 26 m Australian Height Datum (AHD)) and is covered by concrete, with two sheds in the south-east of the site. The site was previously used as a metal recycling facility, which is a similar to the proposed development.

The site is zoned IN1 General Industrial under the Penrith Local Environmental Plan 2010 (Penrith LEP).

2.2 The surrounds

The site is on a two lane road (Peachtree Road) which provides access to an industrial estate off Castlereagh Road. The site is surrounded to the east, west and north-east by industrial buildings, and a cleared and levelled block to the north-west. The nearest residences are approximately 620 m to the south-west along Memorial Avenue, and residences are being constructed approximately 620 m to the east on Thornton Drive (Figure 1).

The land in the industrial estate, which is accessed via Peachtree and Mullins roads, is zoned IN1 General Industrial under the Penrith LEP. This zoning extends to the east and north, with land to the south and west of the industrial estate zoned RE1 Public Recreation.



EMM

Site Location
Penrith Waste Recycling and Transfer Facility
Benedict Recycling Pty Limited
Figure 1

3 Proposed facility

The development will import comingled and segregated pre-classified general solid waste (non-putrescible) for recycling. Some material will be transferred to other regional recycling facilities for further processing or to an EPA licensed waste facility if the material is not able to be recycled.

The wastes will be processed (screening and sorting) to produce saleable recycled materials. The recycled materials produced will include soils, metals and dry paper/cardboard. These products will meet recycled material specifications while recovering a range of materials that will otherwise be used for lower order uses or disposed to landfill.

No special, liquid, hazardous, restricted solid waste or general solid waste (putrescible), as defined in the NSW *Protection of the Environment Operations Act* (POEO Act) and EPA (2014)[1], will be accepted at the development. All of the materials brought onto the site will be taken from the site as products or as rejects for disposal at an EPA licensed landfill. There will be no materials land-filled or otherwise disposed anywhere within the site as a result of this proposal.

3.1 Site components

It is currently envisaged that the development will include the following components:

- a tipping area in the north-west of the site where wastes will be temporarily stored prior to processing;
- use of an existing shed in the south-east of the site for the majority of waste processing activities and some stockpiles;
- a segregated heavy waste (timber, brick/concrete and metal) stockpiling area in bins along the western wall of the shed;
- a yard, storage and parking area;
- two weighbridges, one in the entry and the other in the exit, with a wheel-wash in the outbound traffic lane, demountable offices and amenities;
- a sprinkling site irrigation system to minimise airborne dust; and
- general use areas, including internal roads.

The entire site is sealed.

3.2 Site operations

3.2.1 Waste receival

Approval will be sought for the development to accept a total of 180,000 tonnes per year of the following wastes:

[1] Environment Protection Authority (EPA) 2014, *Waste Classification Guidelines Part 1: Classifying Waste*. November.

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

As described above, no special liquid, hazardous, restricted solid waste or general solid waste (putrescible) will be accepted at the site.

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

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

About 36,640 waste deliveries are expected annually when the development is operating at maximum capacity. This will be a daily average of about 87 deliveries by light vehicles (ie less than three tonnes) and about 45 deliveries by heavy vehicles (ie 3 tonnes to about 42 tonnes). However, variations around these averages are expected on any given day. While light vehicle are expected to make about 66% of deliveries, they will only deliver about 18% of the total tonnage received at the development.

The site is accessible from Peachtree Road via Castlereagh Road. Castlereagh Road is major heavy vehicle route and Peachtree Road is in the IN1 General Industrial zone and is suitable for heavy vehicles.

Waste will be inspected prior to being accepted on site and any loads suspected to contain contaminants will not be accepted.

Wastes will generally be stored on the hardstand prior to processing undercover in the waste processing shed. ?.?.?.

3.2.2 Processing and dispatch

Waste processing will include sorting, picking, screening and stockpiling.

Sorting will generally occur within the shed. A range of mobile plant (eg excavator and front-end loader) and a screening and picking line, will be used to handle and process the waste and products in the shed. Material processed in the shed will be stockpiled prior to quality testing and dispatch.

Segregated heavy waste requiring crushing or shredding (eg concrete, bricks or timber) will be sent to licensed recycling facilities able to process this waste.

Recycled products will generally be dispatched to customers, generally in the western Sydney region, by heavy vehicles.

Some waste (less than 20%) is not yet able to be easily recycled (referred to as 'rejects'). Rejects will be stockpiled prior to be being sent to an EPA licensed facility for disposal.

Dispatch of products and rejects and truck traffic for other site maintenance and consumables deliveries will normally require about 22 truck (generally truck and dog) deliveries daily when the site is operating at its maximum capacity.

These movements correspond to a future total of about 352 vehicle movements (176 actual vehicles) visiting the site each day, representing 218 daily light vehicle and 134 daily heavy vehicle movements for all site activities (including waste receival, products/rejects dispatch, employees and maintenance traffic).

The development will include parking for trucks, and employee and visitor light vehicles. Customer skip bins and skip-bin trucks will also be stored at the development.

3.2.3 Operating hours and workforce

The development will generally accept deliveries (from businesses and the public) and dispatch materials between 6 am and 10 pm Monday to Friday and between 6 am and 5 pm on Saturday. It will also accept deliveries from 8 am to 4 pm on Sunday, providing an additional day on which the public could deliver recyclable waste to the development. On occasions, the development will accept waste deliveries 24 hours per day to allow infrastructure projects operating on a similar basis (eg rail corridor works) and adjoining businesses, to deliver waste as it is generated.

Waste processing will only occur at the site from 7 am to 4 pm Monday to Saturday. There will be no processing on Sundays or public holidays.

At this stage, it is believed that these operating hours will not result in unacceptable environmental impacts (eg noise, traffic and lighting). This will be considered in the EIS (see Section 4).

The development is expected to be operated by about eight Benedict Recycling employees.

3.3 Construction

The surface is sealed with concrete and water management measures will be installed.

Project construction will then require:

- installing gates and fencing as required;
- refurbishing the waste processing shed;
- constructing waste and product bays;
- installing weighbridges and demountable offices/amenities;

- constructing an additional 7 m wide exit driveway;
- marking traffic circulation and parking bays; and
- landscaping at the entrance.

Reticulated water and sewer are available to the site as well as electricity and telecommunications. Major service providers will be consulted during the preparation of the EIS to confirm any specific capacity/connection requirements.

An initial estimate indicates that about $355,000 site improvements would be required and about $975,000 of mobile plant would be used during operations. The construction timeframe would be approximately two months.

4 Preliminary environmental review

A preliminary review of environmental issues associated with construction and operation of the development is provided in Table 1.

Table 1 Preliminary environmental review

Aspect	Preliminary environmental review
Soils and contamination	The EIS will include a preliminary contamination investigation to identify any past or present potentially contaminating activities, to provide a preliminary assessment of any site contamination and, if required, to provide a basis for a more detailed investigation. No significant ground excavation is anticipated and the site is fully sealed with no exposed soils. Therefore, little or no sediment generation is anticipated. There are no acid sulfate soils mapped as occurring near the site.
Surface water	The site is fully sealed. Surface water controls at the site will be designed to prevent uncontrolled release of water from the site. These controls will be described in the EIS. The EIS will also describe the efficient use of mains and rain water and arrangements for the discharge of any excess water.
Groundwater	The site is sealed and therefore no significant ground excavation is anticipated. Minor ground disturbance is unlikely to intersect any groundwater but this will be assessed in the EIS.
Ecology	The site has been previously cleared, filled, levelled and sealed. The trees along the south-western boundary are outside of the site will not be affected by the proposal, other than two to three introduced conifer species which will be removed for construction of the exit driveway.
Roads and traffic	The site is accessible from Peachtree Road via Camden Castlereagh Road. Both roads are suitable for heavy vehicles and the intersection of these roads has been upgraded during the widening of Castlereagh Road. A full traffic impact assessment will be undertaken as part of the EIS.
Air quality	Some of the proposed activities have the potential to produce airborne dust. However, dust emission levels are generally expected to be low as the site will be sealed and an irrigation system installed. Dust levels at sensitive receptors will be assessed in the EIS. Given that no putrescibles will be accepted at the development, significant odours are not expected to be generated. Given the distance to the closest residences potential dust and odour impacts are not anticipated to be at an unacceptable level.
Noise	The site is in an existing industrial area, which is a significant distance from potential residential noise receivers. Noise levels at sensitive receptors will be assessed in the EIS.

Table 1 Preliminary environmental review

Aspect	Preliminary environmental review
Visual	The site is flat and at a similar level to the surrounding sites. The site is currently surrounded by a wall which will be retained and upgraded as necessary. As such, the site will be largely obscured from external viewpoints and will be in keeping with the industrial character and appearance of the area. Potential visual impacts will be assessed in the EIS.
Aboriginal and historic heritage	Given that the site has been cleared, it is unlikely that there will be any items of Aboriginal or historic heritage. A search of the relevant heritage registered will be undertaken and should any items be identified an appropriate level of assessment will be described in the EIS.
Bushfire	The site is not on bushfire prone land.
Hazards	An above-ground diesel tank (approximately 30,000 L capacity) will be installed within a bund. Small amounts of other hazardous materials (eg acetylene for welding) will also be stored on site. Hazardous waste will not be accepted by the development. The EIS will determine if the development will be a potentially hazardous or offensive development according to SEPP 33 – Hazardous and Offensive Development.
Waste	A waste management plan, including an incoming waste quality plan will be prepared prior to the start of operations.

It is considered that it is appropriate to address the following environmental aspects in the EIS as described Table 1:

- soils and contamination;
- surface water;
- roads and traffic;
- air quality and greenhouse gases;
- noise;
- visual;
- hazards; and
- waste.

5 Planning controls

5.1 Legislative framework

A summary of legislation (including planning instruments) and polices relevant to the development proposal is provided in Table 2.

Table 2 Legislation relevant to the development

Legislation/instrument	Relevant section	Comment
POEO Act	Schedule 1	Proposed activities at the development are listed under Schedule 1 of the POEO Act as 'Resource recovery' activities. Accordingly, an environment protection licence will be required.
Environmental Planning and Assessment Act 1979 (EP&A Act)	Section 89C	Section 89 of the EP&A Act identifies that a SEPP may declare any development to be SSD. Where a development is declared SSD the Minister is the consent authority.
State Environmental Planning Policy (SEPP) (State and Regional Development) 2011	Schedule 1 State significant development—general	The development will be SSD pursuant to Schedule 1 of the State and Regional Development SEPP as it constitutes a waste and resource management facility, where development for the purpose of resource recovery or recycling facilities that handles more than 100,000 tonnes per year of waste.
SEPP (Infrastructure) 2007		Waste or resource management facilities may be developed with consent in an IN1 General Industrial zone (see below).
SEPP 33 Hazardous and Offensive Development		SEPP 33 applies to development of potentially hazardous industry. It requires the consent authority to consider whether an industrial development is a potentially hazardous industry or a potentially offensive industry. The EIS will consider if the development will be a potentially hazardous industry.
SEPP 55 Remediation of Land		No significant subsurface disturbance activities are proposed. If the preliminary hazard investigation determines that the site is contaminated an assessment of the appropriate level of action required to remediate the site will be undertaken in accordance with SEPP 55.
Penrith LEP	2.1 Land use zones	The site is zoned IN1 General Industrial.
	Land Use Table	The development is permissible with consent in accordance with the IN1 zone and meets the objectives of the zone.
Penrith Development Control Plan (DCP) 2014	D4 Industrial Development	The DCP includes detailed development control provisions for all development on industrial zoned land including land zoned IN1 General Industrial at Penrith.
	Built form and design	The DCP includes provisions for building height, design, setback and landscaping. It is envisaged that the development will be designed, including possible alterations of existing buildings, in accordance with the relevant provisions of the DCP.
	Stormwater	Industrial development with a hardstand greater than 1,000 m^2 needs to submit a water management plan detailing how water quality strategies will be incorporated in the development design to manage water generated from the site and to consider how any on-site water system will be available for use for non-potable uses. An appropriate on-site water detention system will be described in the EIS, which will include options for water re-use.
	Waste	The DCP requires preparation of a waste management plan when constructing, altering or demolishing a building. Waste generation, classification and disposal will be considered in the EIS.
	Noise and vibration	A noise impact assessment will be prepared as part of the EIS

Table 2 Legislation relevant to the development

Legislation/instrument	Relevant section	Comment
		with consideration of relevant state and local government noise criteria, including the DCP.
	Air Quality	The emission of air impurities will be controlled in accordance with the Clean Air (Plant & Equipment) Regulation.
		An air quality impact assessment will be prepared as part of the EIS to determine compliance with relevant state and local government noise criteria, including the DCP.

6 Project justification

The NSW Government has committed close to $500 million to transform waste and recycling in NSW. The 'Waste Less, Recycle More: A Five-year $465.7 million Waste and Resource Recovery Initiative' (EPA 2013) states that "[m]ore effort is needed to continue increasing the recycling rate for waste from households, business and industry" and further that "[s]ignificant infrastructure investment is required in order to keep up with the increasing waste generation rates and meet the NSW recycling targets."

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

The site is ideally located for the proposed development because:

- it is ideally located in western Sydney to service a number of major urban areas including, Penrith, Werrington, Kingswood, Glenmore Park and the Blue Mountains;
- it is readily accessible from major transport links including Castlereagh Road, Mulgoa Road and the M4;
- the site is within an existing industrial area surrounded by other compatible developments and land uses;
- the site is adequately separated from sensitive receivers (ie residences) to enable potential adverse environmental impacts (ie air and noise) to be managed and/or mitigated; and
- the proposed activities are not expected to be visible from any publically accessible location.

7 Closing

We have approached Penrith City Council regarding the proposal and plan to meet with the Council to discuss the proposal. Benedict Recycling are in a position to start development of the development as soon as the required approvals are obtained. We therefore request timely provision of SEARs for the project.

Should you require any further information, please do not hesitate to contact Philip on 9493 9518, 0409 702 050 or via email, or Mark on 9493 9509, 0414 670 254 or email. We also welcome an opportunity to meet with the Department to discuss the proposal should clarifications or further information be required.

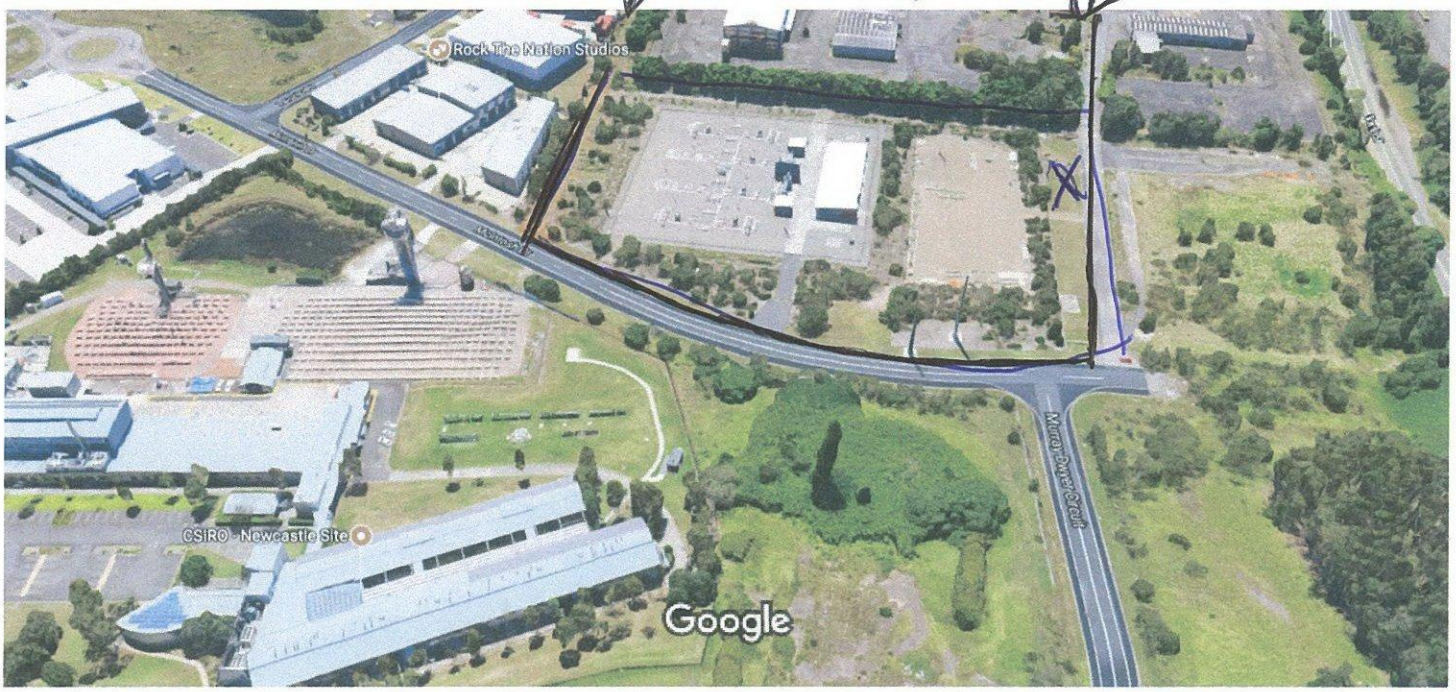
Yours sincerely

Philip Towler
Associate Director
ptowler@emmconsulting.com.au

Mark Roberts
Senior Environmental Scientist
mroberts@emmconsulting.com.au

Google Maps 1 McIntosh Dr

Mayfield West 50,670 sq m



Imagery ©2017 Google, Map data ©2017 Google 20 m

1 McIntosh Dr

Mayfield West NSW 2304

At this location

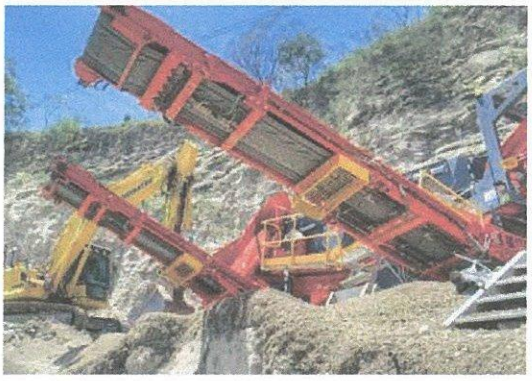
Benedict Recycling

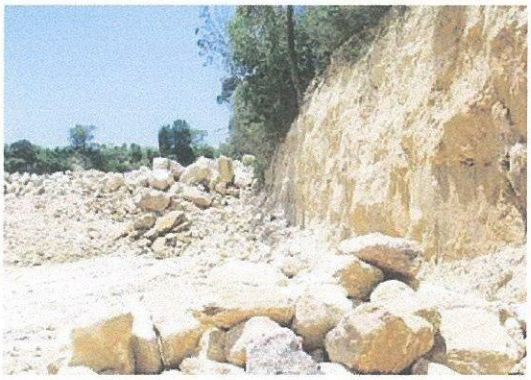
3.0 ★★★☆☆ (2)

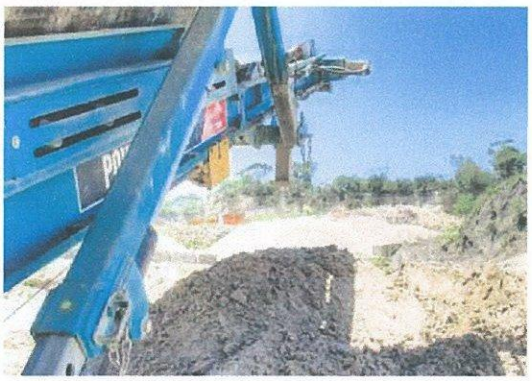
Recycling Center · 1 McIntosh Dr

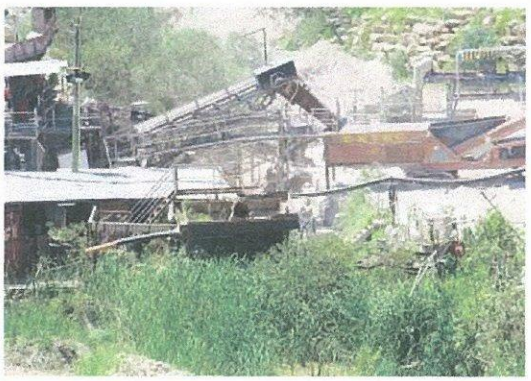
Open until 3:00 pm

Belrose Site – 59,270 sq m (2)







Brick and Concrete

NO ASBESTOS

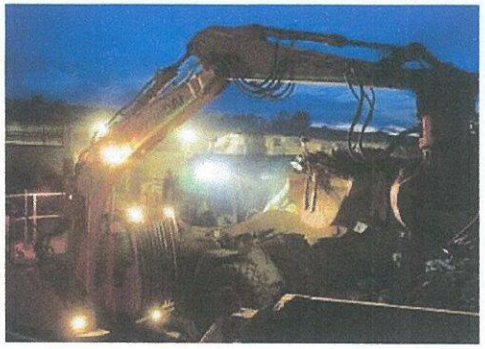
NO FOOD WASTE

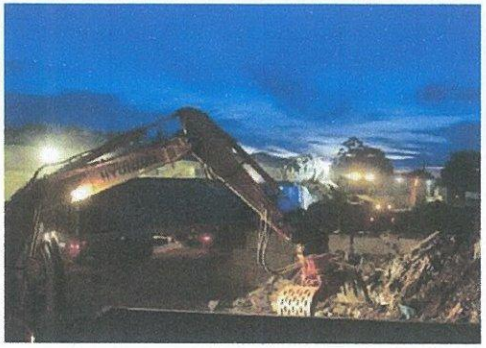
Chipping Norton Facility
14,150 sq mtr.

3

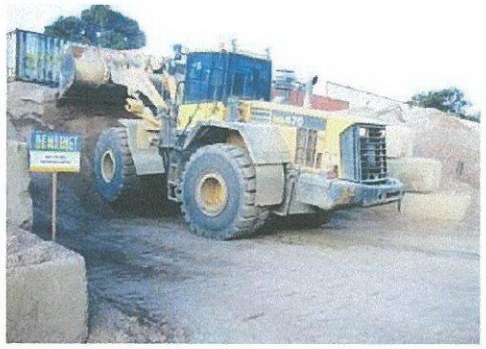
PRODUCTS AVAILABLE

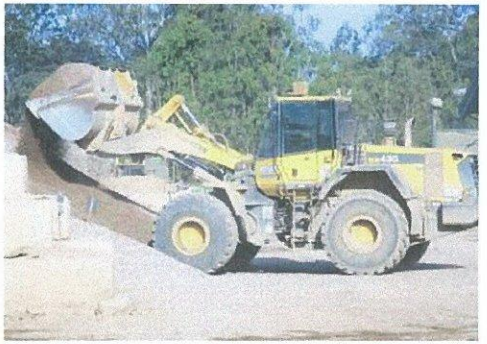
10mm Aggregates
Recycled soil screened to minus 5mm
Roadbase (to order)
Minus 6mm crusher dust / bedding sand

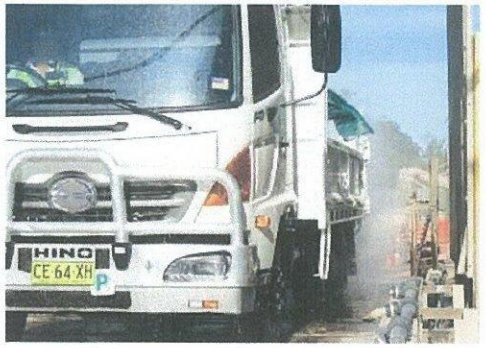


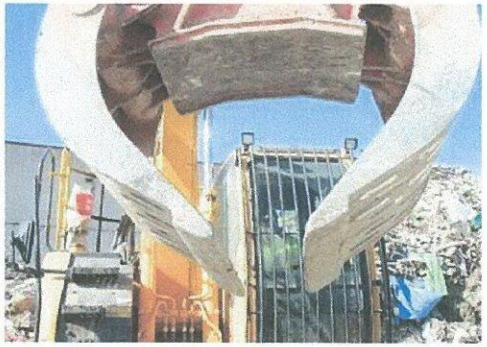


(8)



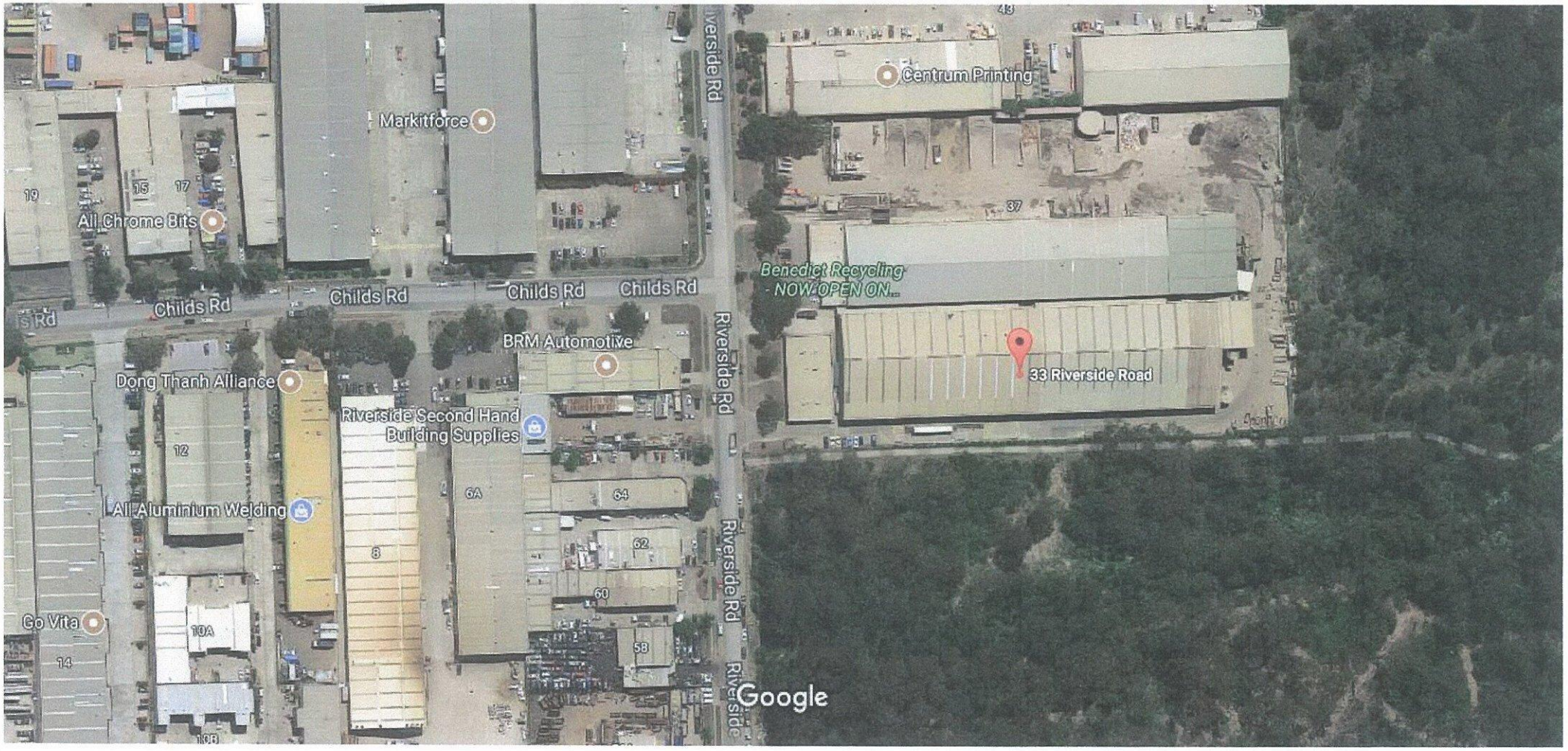






5

Google Maps 33 Riverside Rd



Imagery ©2017 Google, Map data ©2017 Google 50 m

33-39 Riverside Rd
Shipping Container

Benedict Recycling - NOW OPEN ON ...

ALL BY OWNER

Addendum 3

Google Maps 2 Peachtree Rd

Subway Food Outlet

Subject site

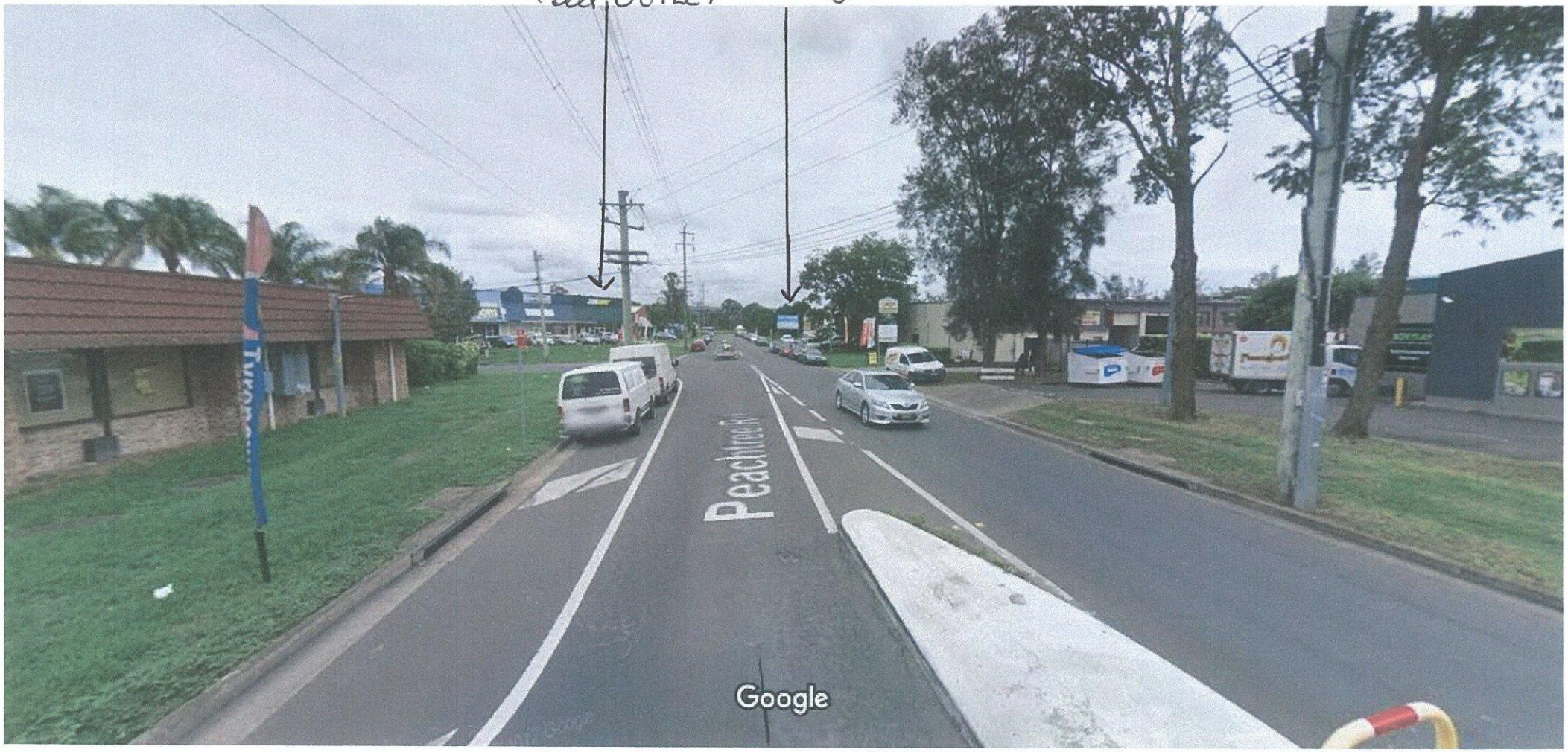


Image capture: Mar 2017 © 2017 Google

Penrith, New South Wales

Street View - Mar 2017

Addendum (4)

Google Maps Peachtree Road, General Area

Imagery ©2017 Google, Map data ©2017 Google 50 m