Ref: 128214/2330/1.01

3 April 2012

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

Attention: Mr Chris Wilson

Dear Chris

STATE SIGNIFICANT DEVELOPMENT
BLACKTOWN WASTE RESOURCE TRANSFER STATION

We are writing on behalf of Blacktown Waste Services Pty Ltd (the Proponent) in relation to a proposed waste resource transfer station at 920 Richmond Road, Blacktown. The waste resource transfer station will be located on land currently reserved for the Blacktown Waste Management Centre (landfill), on two blocks adjacent to the active landfilling areas. The site is located within the Marsden Park Industrial Precinct. The waste resource transfer station facility would be operated by Blacktown Waste Services (BWS) and would be designed to produce a range of recyclable material including plastics, paper, wood and metal from the feedstock currently being landfilled.

It is not proposed to increase the handling capacity of the existing approved landfill (i.e. 360,000 tonnes per year). Rather a maximum of 360,000 tonnes of waste would be recycled on-site where it would be sorted. Recyclables would then be dispatched off site and residual waste material deposited within the approved landfill.

The proposal will reduce environmental harm in accordance with the principles of ecologically sustainable development through resource recovery and the recycling of a number of products that would otherwise have been diverted to the landfill. It will extend the operation of the existing landfill site by a further 4 years (but still within the approved operational life of the landfill).

The purpose of this letter is to request that the Director-General issue the environmental assessment requirements for the provision of an Environmental Impact Statement (EIS) in relation to the abovementioned development.

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The majority of the site is zoned IN1 General Industrial under the Marsden Park Industrial Precinct Plan of State Environmental Planning Policy (Sydney Region Growth Centres) 2006 (Growth Centres SEPP). The proposed "waste or resource transfer station" falls within the group definition of a "waste or resource management facility". Within the IN1 General Industrial zone, development for the purpose of a "waste or resource management facility" (but not including a "waste disposal facility") and "waste or resource transfer station[1]" is permissible with development consent.

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 waste resource transfer station (and existing land fill) will handle up to 360,000 tonnes of waste per year and clearly satisfies the criteria in Clause 23 in Schedule 1.

[1] In accordance with the Growth Centres SEPP:

*"**waste or resource management facility** means a waste or resource transfer station, a resource transfer station or a waste disposal facility"*

*"**waste or resource transfer station** means a building or place used for the collection and transfer of waste material or resources, including the receipt, sorting, compacting, temporary storage and distribution of waste or resources and the loading or unloading of waste or resources onto or from road or rail transport"*

To assist in determining the Director General 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 9956 1295.

Yours sincerely,

Elise Crameri
Associate Planner

PRELIMINARY ENVIRONMENTAL ASSESSMENT
WASTE RESOURCE TRANSFER STATION

1.0 THE SITE AND LOCALITY

1.1 The Site

The site comprises an area of approximately 91 hectares and is currently occupied by the Marsden Park Landfill. It is located approximately 40 km northwest of Sydney Central Business District and 9 km northwest of Blacktown (refer to Location Plan in **Figures 1** and **2**).

The surrounding area is characterised by other light industrial uses (manufacturing, storage, waste and recycling facilities), agricultural land (stock grazing and other farming) and rural residential allotments. The Town and Country Caravan and Mobile Home Park is located to the south of the site, at the western end of Hollingsworth Road.

The site is within the Marsden Park Industrial Precinct, within the North West Growth Centre. The whole of the Marsden Park Industrial Precinct, including the site, has been the subject of broad strategic planning investigation and environmental assessment over a number of years by Blacktown Council and the Department of Planning & Infrastructure prior to it being released for urban development by the Minister for Planning. Once complete, Marsden Park Industrial precinct will accommodate approximately 70 hectares of commercial uses, 40 hectares of bulky goods uses, 206 hectares of industrial uses and a mix of residential close to the new Marsden Park Town Centre.

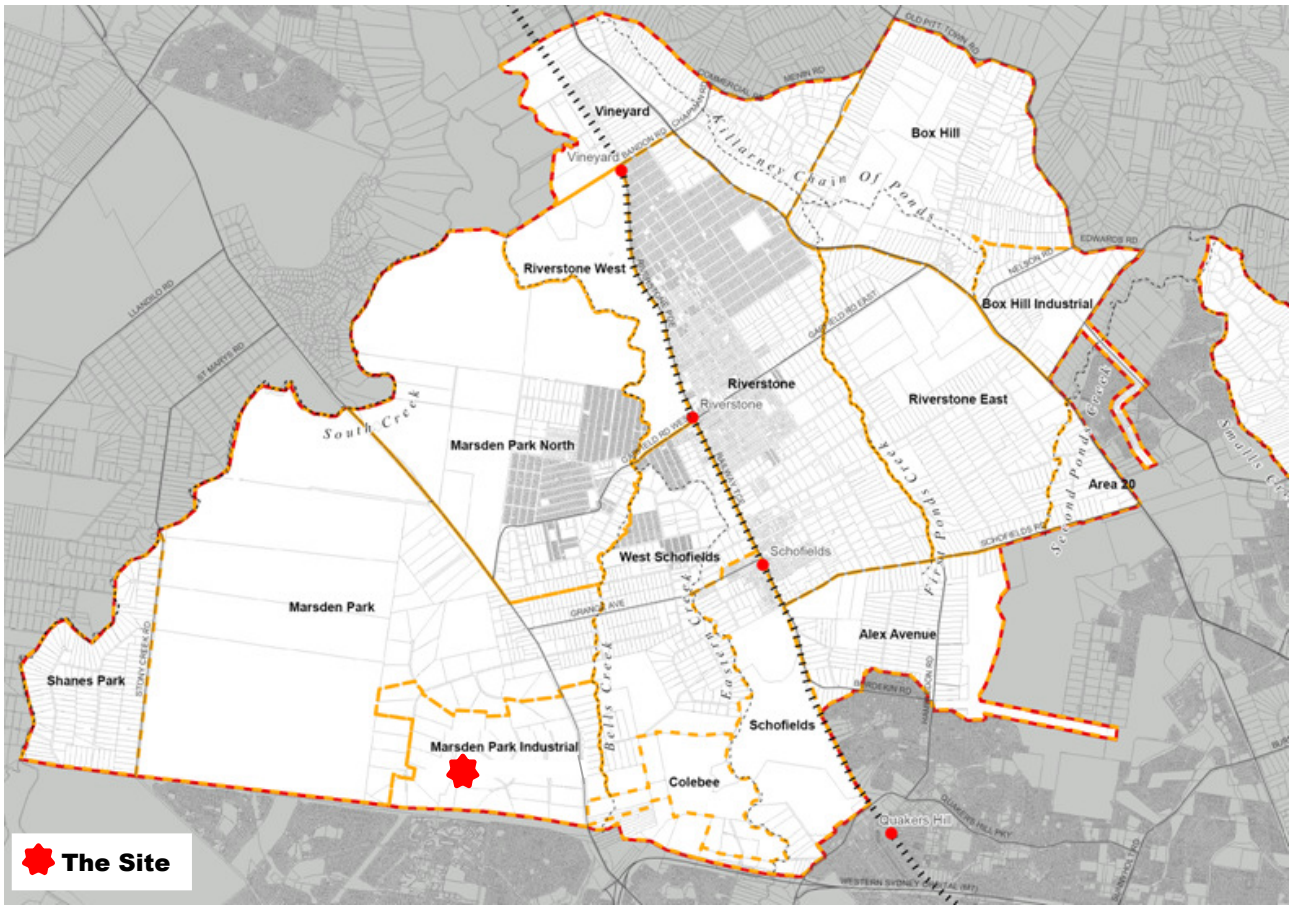

Figure 1 – Location Plan

Figure 2 – Aerial Photograph

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 (ha)
Lot 32 in DP 262886	11
Lot 33 in DP 262886	10
Lot 34 in 262886	10
Lot 47 in DP 262886	39
Lot 291 in DP 262886	9
Lot 292 in DP 1076555	12

The site is wholly owned by Ganian Pty Ltd. A plan showing the above properties, prepared by J Wyndham Prince is included at **Attachment A**.

1.3 Approvals and Current Operation

On 7 September 2000, the Land & Environment Court granted approval for an "extractive industry and landfill" on the site. The approved solid waste landfill is operated by BWS as an Environmental Protection Authority (EPA) approved Solid Waste Class 2 Landfill – licensed to receive commercial waste including solid non-hazardous and non-putrescibles, general demolition waste, category 1,2 and 3 asbestos waste as well as asbestos contaminated soil.

Landfilling activities are undertaken only on Lots 47 and 292 in DP 262886. The existing facility is licensed to handle up to 360,000 tonnes of waste per year. It is not proposed to increase the handling capacity of the existing approved landfill. It is proposed that a maximum 360,000 tonnes of waste will be brought to the site where it would be sorted in the proposed waste resource transfer station. Recycled materials will be dispatched off site and the residual waste deposited in the landfill.

On site facilities for the landfill operation include a portable office/amenities building, parking for site operators and a secure compound for mobile equipment. Administration offices are located near the entrance to the site on Richmond Road and a weighbridge is also located on the access road off Richmond Road, near the site's entrance.

2.0 STATUTORY AND STRATEGIC PLANNING CONTEXT

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

- *Protection of the Environment Operations Act, 1997;*
- *Contaminated Land Management Act, 1997;*
- State Environmental Planning Policy (Sydney Region Growth Centres) 2006; and
- Marsden Park Industrial Precinct Plan.

2.1 Existing Zoning

The majority of the site is zoned IN1 General Industrial under the Marsden Park Industrial Precinct Plan of State Environmental Planning Policy (Sydney Region Growth Centres) 2006 (Growth Centres SEPP). Part of the site is zoned SP2 Local Drainage and E2 Environmental Conservation (refer to zoning extract included at **Figure 3**).

The proposed waste resource transfer station is to be wholly contained on land zoned IN1 General Industrial. Within the IN1 zone, development for the purpose of a "waste or resource transfer station[2]" is permissible with development consent.

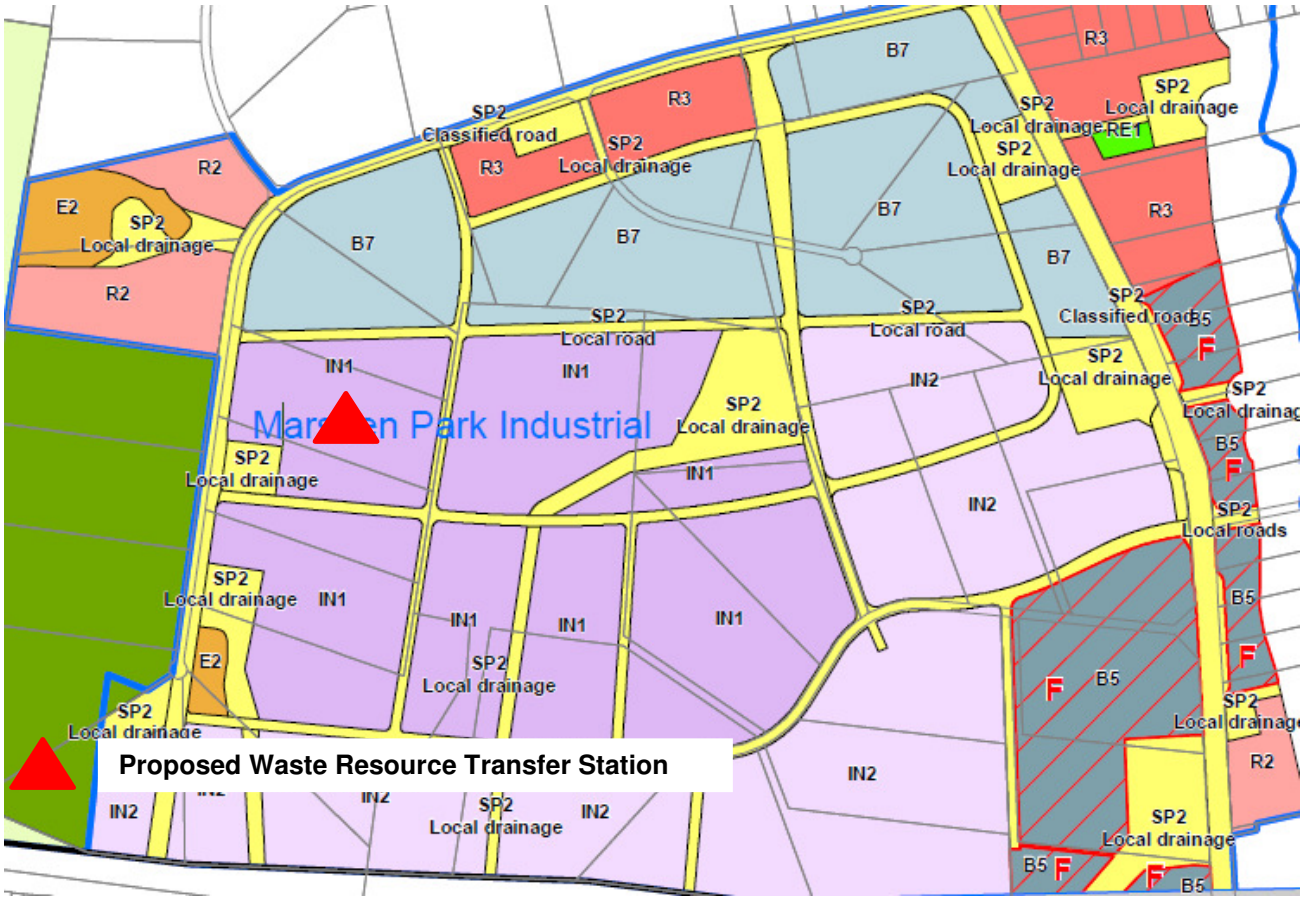

Figure 3 – Zoning Extract

[2] In accordance with the Growth Centres SEPP:

*"**waste or resource transfer station** means a building or place used for the collection and transfer of waste material or resources, including the receipt, sorting, compacting, temporary storage and distribution of waste or resources and the loading or unloading of waste or resources onto or from road or rail transport"*

3.0 THE PROJECT

3.1 Overview

The proposed waste resource transfer station will form part of the approved Marsden Park Landfill. As discussed above, the existing landfill facility is licensed to process up to 360,000 tonnes per year of non-putrescible waste. It is not proposed to increase the handling capacity of the existing approved landfill (i.e. 360,000 tonnes per year).

At this stage, the waste resource transfer station is expected to receive up to 75% of recoverable material suitable for re-use in secondary markets including plastics, paper, wood and metal. The remaining non-recoverable waste would be transferred to the existing landfill facility on the site.

3.2 Proposed Infrastructure

The proposed waste resource transfer station would make use of existing site infrastructure including the existing vehicular access road to the landfill facility on the site from Richmond Road, other internal roads as well as the existing weighbridge located within the north-west corner of the site.

The proposal would involve the construction of up to three buildings/recycling sheds. During the initial stage of the project only one building is expected to be constructed with subsequent buildings coming on line when market demand increases and where new markets for recyclables has been identified.

Each building is expected to be approximately 100 m (length) x 50 m (width) x 12 m (height) and capable of accommodating 4 large trucks (17 m), a truck passing lane, tipping floor areas, storage and sorting areas / bays and a picking line.

3.3 Operation

Only general solid waste (non-putrescible) would be accepted at the waste resource transfer station, consistent with the existing landfill operation. The waste resource transfer station would separate suitable non-putrescible waste into different recyclable products, the exact proportion of these recyclables products being dependent upon the waste characteristics and market conditions.

It is expected that trucks would enter the waste resource transfer station and be directed to a receiving or tipping area where the waste would be checked for any ‘non-conforming’ waste. Any trucks containing ‘non-conforming’ waste would be directed off-site. Trucks would then be allowed to deposit waste within the waste resource transfer station. A second inspection would then be undertaken. Any ‘non-conforming’ waste would be removed from the facility. Any sizeable and intact recyclable would also be removed from the waste stream and sorted into bays by manual and / or mechanical means.

A front end loader and excavator would then load the material into the processing area. The trucks would then leave the facility via the internal access road and existing outgoing weighbridge to Richmond Road.

Waste would be mechanically sorted using a combination of processing equipment such as shredders, screens, magnets, density separators and optical sorters. Manual sorting would also be utilised. Materials extracted during the process stage would be sorted into separate designated bays (i.e. wood, plastics, metal). Any residual non-conforming waste, or recyclable material without a viable market, would be transferred to the existing landfill.

3.4 Hours of Operation

The proposed waste resource transfer station will adopt the same hours of operation for the existing approved landfill, namely:

Monday to Friday – 6.00 am to 6.00 pm
Saturday 7.00 am to 4.00 pm
Sunday 9.00 am to 3.00 pm

3.5 Vehicular Access

Vehicular access to the waste resource transfer station is proposed to be via the existing landfill site (from Richmond Road). As redevelopment of Marsden Park Industrial precinct occurs and new roads are constructed an alternative access to the proposed facility from the south may be pursued.

3.6 Employment

The existing landfill facility provides employment for 8 personnel and an additional 5 administration staff (i.e.13 jobs in total). The proposed waste resource transfer station will utilise staff currently employed at the landfill as well as provide employment opportunities for an additional 5 workers.

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, soil and water;
- Transport, access and parking;
- Air, noise and vibration;
- Hazards and Fire;
- Visual; and
- Impacts on future development.

4.1 Stormwater, Soil and Water

The EIS will provide details in relation to water supply, usage, measures to minimise water use and measures to be implemented within the facility to ensure waste water and surface water is appropriately captured and treated prior to disposal. The EIS will also provide details on the proposed erosion and sediment controls during construction and operation.

4.2 Transport, access and parking

The existing approved landfill facility is licensed to receive and deposit up to 360,000 tonnes of waste per annum. As it is not proposed to increase the amount of waste to be received on the site (i.e. existing landfill facility + proposed waste resource transfer station = maximum 360,000 tonnes per year), the impact on the surrounding road network including Richmond Road is not expected to significantly change.

The likely impacts of the proposal on existing access points, the surrounding road network and intersections as well as mitigation measures will be documented in the EIS.

4.4 Air, noise and vibration

The proposed waste resource transfer station will include details in relation to air, dust and odour emissions during the construction (as relevant) and operation of the waste resource transfer station. An assessment of air quality would be carried out as part of the EIS. Recommended mitigation measures from this assessment would be incorporated into the detailed design of the proposed facility. It is noted that as no putrescible waste is to be processed at the facility, it is not expected that the proposal will have any significant odour impact.

In relation to noise, the EIS will be accompanied by an acoustic assessment to determine the impacts of the proposed waste resource transfer station on existing workers and adjoining properties, including the existing caravan and mobile home park to the south-east of the site. Recommended mitigation measures from this assessment would be incorporated into the detailed design of the proposed facility, so as to comply with the relevant noise criteria.

4.5 Hazards and Fire

The EIS will provide details on the environmental protection equipment to be installed in the premises including air, water and noise controls, spill clean-up, equipment and fire management and containment measures.

4.6 Visual

The proposed waste resource transfer station is to be located within the existing Marsden Park Landfill site. The proposed development will include some additional landscaping, particularly along the facility's southern edge to screen the proposed development (where appropriate) when viewed from the south. This will be particularly important as redevelopment of the larger industrial precinct occurs.

4.7 Impacts on Future Development

The impacts of the proposed waste resource transfer station on surrounding future industrial and commercial development (as precinct develops) will be assessed and documented in the EIS. Mitigation measures (visual, hazards and fire, noise, vibration etc) will be incorporated into the detail design of the proposed waste resource transfer station to ensure impacts on future surrounding development are not significant.