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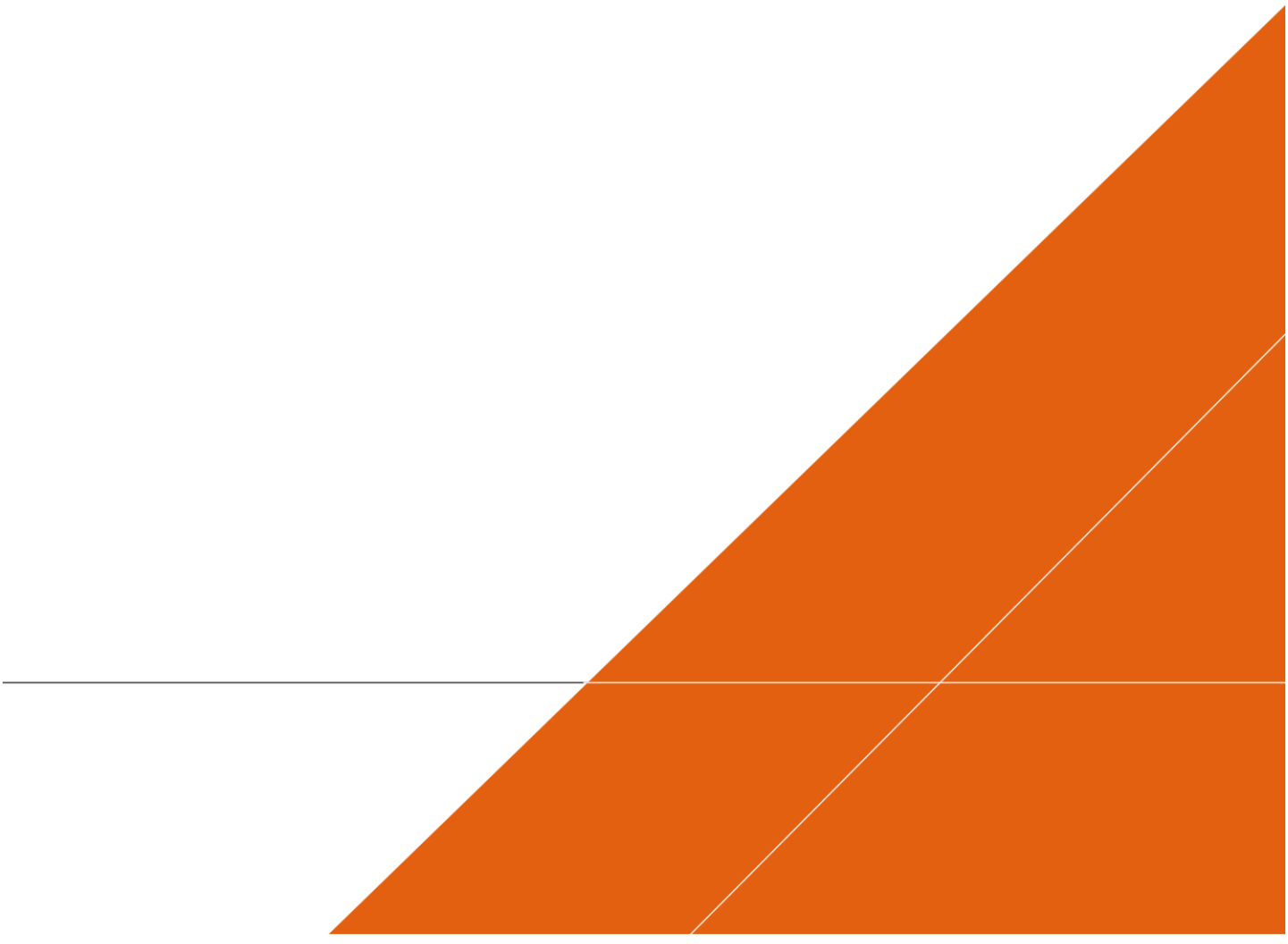
KINGS PARK METAL RECOVERY AND RECYCLING FACILITY EXPANSION

SSD Scoping Report

21 NOVEMBER 2019



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KINGS PARK METAL RECOVERY AND RECYCLING FACILITY EXPANSION SSD APPLICATION

Sell and Parker Pty Ltd

SSD Scoping Report

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Date	21/11/2019	
Revision Text	Final Report V2	

REVISIONS

Revision	Date	Description	Prepared by	Approved by
Draft	11/11/2019	Draft Report	FM, SF	WO
Final V1	14/11/2019	Final Report V1	FM, SF	WO
Final V2	21/11/2019	Final Report V2	FM, SF	WO

CONTENTS

APPENDICES

GLOSSARY

Term	Definition
The Applicant	The entity seeking approval, namely Sell and Parker Pty Ltd
Blacktown DCP	*Blacktown Development Control Plan 2015*
Blacktown LEP	*Blacktown Local Environmental Plan 2015*
CLM Act	*Contaminated Land Management Act 1977*
COAG	Council of Australian Governments
Council	Blacktown City Council
DPIE	Department of Planning, Industry and Environment
DP	Deposited Plan
ECS	Emissions Collection System
EIS	Environmental Impact Statement
EP&A Act	*Environmental Planning and Assessment Act 1979*
EP&A Regs	*Environmental Planning and Assessment Regulation 2000*
EPA	Environment Protection Authority
EPBC Act	*Environmental Protection and Biodiversity Conservation Act 1999*
EPL	Environment Protection Licence
ISEPP	*State Environmental Planning Policy (Infrastructure) 2007*
LEC	Land and Environment Court
MNES	Matters of National Environmental Significance
MOD / MODs	Modification(s)
Modification 1 (MOD 1)	The approved modifications to the Original Approval dated 6 July 2017
Modification 2 (MOD 2)	The approved modifications to the Original Approval and approved MOD 1 dated 26 February 2018
Modification 3 (MOD 3)	The approved modifications to the Original Approval and approved MOD 2 dated 29 May 2019
OEMP	Operational Environmental Management Plan
The Original Approval	The approved Environmental Impact Assessment for SSD 5041 (and subsequent modifications)

Term	Definition
POEO Act	*Protection of the Environment Operations Act 1997*
The Proposal	The proposal for which approval is being sought, namely the expansion of Kings Park metal recycling and processing facility
The Proposal site	The Sell and Parker Premises at 23-43 and 45 Tattersall Road, Kings Park NSW. The area at which the Proposal would be located incorporates the following lots: • Lot 2, DP 550522 • Lot 5, DP 7086.
RRF	Resource Recovery Facility
SEARs	Secretary's Environmental Assessment Requirements
SEE	Statement of Environmental Effects
SEPP 33	*State Environmental Planning Policy No. 33 – Hazardous and Offensive Development*
SEPP 55	*State Environmental Planning Policy No. 55 – Remediation of Land*
SEPPs	State Environmental Planning Policies
SSD	State Significant Development
State and Regional SEPP	*State Environmental Planning Policy (State and Regional Development) 2011*
Tpa	Tonnes per annum
Sell and Parker	Sell and Parker Pty Ltd
WARR Act	*Waste Avoidance and Resource Recovery Act 2001*
WHS	Work health and safety
WM Act	*Water Management Act 2000*
WMS	Water Management System

1. INTRODUCTION

1.1 Overview

Sell and Parker (the Applicant) currently own and operate a resource recovery facility (RRF) at 23-43 and 45 Tattersall Road, Kings Park (the Proposal site) (Figure 1). The RRF currently operates under approval SSD 5041 and three associated modifications (the Original Approval).

The Applicant is seeking approval to increase the throughput limit of the RRF from 350,000 to 600,000 tonnes per annum (tpa) (the Proposal). Approval for the Proposal is sought as State Significant Development (SSD) under Part 4, Division 4.7 of the *Environmental Planning and Assessment 1979* (EP&A Act).

The increase in throughput limit would allow the Applicant to recycle up to 600,000 tpa of scrap metal (from both on-site and external sources). The Proposal would assist in achieving the higher recycling contamination standards prescribed by China's National Sword Policy as well as further reducing the volume of scrap metal that goes to landfill.

The existing infrastructure at the Proposal site has the capacity to accommodate the increased throughput and the Proposal would not require any physical works or change to the nature of operations. However, some adjustments to site management practices such as internal traffic flows and scheduling would be required.

The purpose of this SSD Scoping Report is to provide documentation in support of a request for SEARs for the Proposal, which would inform the preparation of an Environmental Impact Statement (EIS) under Part 4 of the EP&A Act.

1.1.1 Proposal Objectives

The key objectives of the Proposal include the following:

- To increase the volume of scrap metal recycled at the RRF utilising existing approved infrastructure
- To meet higher recycling standards prescribed by China's National Sword Policy
- To optimise the efficiency of site processes, including vehicle movements and stacking locations
- To improve environmental performance of the Proposal site.

LEGEND

- Site boundary
- Cadastre
- Watercourse

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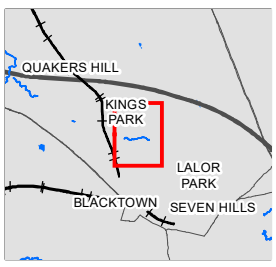

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Figure 1 – Location of the Proposal site

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1.1.2 Proposal Components and Key Terms

Table 1 provides a summary of the key terms, in addition to the glossary provided above, which are key to this report.

Table 1 Summary of key terms

Term	Description
The Original Approval	The approved Environmental Impact Assessment for SSD 5041 (and subsequent modifications)
The Proposal	The proposal for which approval is being sought, namely the expansion of Kings Park metal recycling and processing facility
The Proposal site	The Sell and Parker Premises at 23-43 and 45 Tattersall Road, Kings Park NSW (Figure 2). The area at which the Proposal would be located incorporates the following lots: • Lot 2, DP 550522 • Lot 5, DP 7086.

LEGEND

- Site boundary
- Cadastre
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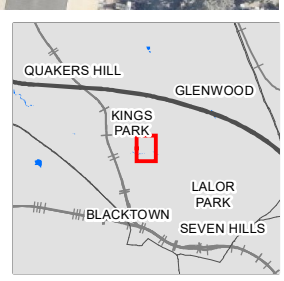

Figure 2 – The Proposal site

1.2 Introduction to Sell and Parker (the Applicant)

Sell and Parker (the Applicant) purchase, sell and recycle all types of Ferrous and Non-Ferrous metals. Their facilities are located strategically throughout NSW and Australia including Sydney (Blacktown, Banksmeadow, Ingleburn) the NSW North Coast (Coffs Harbour), NSW South Coast (Nowra) and Hunter Region (Newcastle). Other facilities throughout Australia include Darwin and Port Headland.

Sell and Parker hold a licence (number A03604008) issued by the Administration of Quality Supervision, Inspection and Quarantine (AQSIQ) agency of the Chinese Government allowing them to export scrap metal to China. They are also one of only three accredited suppliers to BlueScope Steel. As a result, Sell and Parker have the opportunity to pursue growth in metropolitan markets via economies of scale, vertical integration (acquisition) and superior networks that help reduce transportation costs and improve service delivery. The Kings Park RRF forms an important piece of Sell and Parker's network, servicing the Greater Sydney Metropolitan Area.

1.2.1 Site Optimisation and Environmental Performance

The Applicant has undertaken a series of actions as part of the Original Approval and subsequent modifications (MODs 1 - 3) to optimise operations, and improve safety and environmental performance at the Proposal site. To date, the works associated with the modifications to the Original Approval have either been completed or are close to completion. During the construction period, further opportunities to optimise the site layout and processes to improve safety, environmental performance and site efficiency have been identified and implemented as outlined in Table 2.

Table 2 Site optimisation and environmental performance

Item	Details
Transport and access	• Relocation of the acoustic wall on the western boundary of the Proposal site to allow the widening of the internal road to facilitate two-way movement of trucks • Reconfiguration of entry weighbridges and overhead weighbridge office, relocation of exit weighbridge and installation of roller shutters • Replacement of the dual-entry weighbridge structure with a single-entry weighbridge and construction of an awning annex to accommodate the expected queuing of vehicles and allow the weigh and load of trucks in a safe and efficient manner • Realignment of the conveyor and relocation of the hand unload operations to allow better flow of vehicles through the Proposal site and a reduction in conflicting activities • Signage upgrades at entrances to provide clear direction for wayfinding and minimise heavy vehicle, light vehicle and pedestrian conflicts.
Air Quality	• The storage for shred residual materials has been relocated to the centre of the Proposal site in a fully enclosed building • To achieve air quality control performance, an Emissions Collection System (ECS) has been installed at the Hammermill to the satisfaction of the Environment Protection Authority (EPA) and the Department of Planning, Industry and Environment (DPIE) • A larger shear (1400T Shear) has been installed at the Proposal site which meets improved air quality and noise standards.
Noise	• An increase in the overall height of the acoustic wall along the western edge of the Proposal site from 8 metres to 10 metres to improve noise and dust control

Item	Details
	• Installation of engineering controls to mitigate noise such as the airblast overpressure device to monitor noise levels, acoustic panelling at every boundary of the Proposal site, Hammermill acoustic walls, floc processing located in a fully enclosed building, and semi encapsulation of the trommel separator.
Landscape and visual amenity	• Extension of existing fencing along the Tattersall Road frontage (northern boundary) to improve shielding (visual, dust and noise) • Vegetation on the northern and western boundaries has been retained and enhanced to provide additional screening to the Proposal site • Fencing has been constructed from colorbond (or similar) which considerably reduces the visual impact of the Proposal site and integrates the facility to the surrounding industrial area.
Waste management	• Engineering controls have been designed and implemented to minimise waste loss from the shredder separation system, floc storage and post floc recovery • The tracking, monitoring and recording of material movement onto and off site is controlled by an electronic software data system, which includes weighbridge systems, scales, input and output material tracking systems, material grade/type and quality and customer details.
Stormwater, soil and water	• Redesign of the Water Management System (WMS) to meet Sydney Water sewer discharge requirements • There is no discharge of water to Breakfast Creek from the Proposal site. Therefore, through consultation with EPA it was determined that monitoring of discharge to Breakfast Creek was unnecessary (this condition was removed as part of MOD 3). There is a trade waste agreement in place since December 2018 with Sydney Water • Other engineering controls have been implemented, such as driveway filtration systems and an exit wheel wash to capture materials.
Fire infrastructure	• Upgraded fire infrastructure has been installed to assist the Proposal site in meeting the requirements of the Fire Order (dated January 2018). The upgraded infrastructure includes the provision of pipes, tanks, pumps, hydrants and water cannons in accordance with the fire design specifications • The floc building is monitored by a fire monitoring system. Additions to this system include thermal and flame cameras for fire detection in addition to a water deluge system for the stockpile.
Office buildings	• Installation of additional elevated offices and amenities (within the buildings), including lunchroom and toilet block.
Extension of hours	• Operational hours (no public access or resource recovery processing) have been extended to allow cleaning and maintenance activities from 9pm to 6am Monday – Saturday and 24 hours on Sunday. This has enabled the existing RRF to maximise resource recovery tasks during the approved operational hours.

An audit has been scheduled for mid November 2019 to assess compliance with conditions of all development consents and Environmental Protection Licence (EPL) relevant to the existing RRF. The results of this audit would be presented in the EIS.

The Proposal site currently operates under EPL No. 11555 which allows scrap metal recycling up to 350,000 tpa as described in Section 1.5 of this scoping report.

Based on the Applicant's weighbridge data, the Proposal site currently has an approximate throughput of 340,000 tpa. However, as discussed in Section 3.4.3, the Proposal site has the capacity to accommodate an increased throughput without altering the approved operational hours or requiring any construction works on the Proposal site.

1.3 Purpose of this Report

The Proposal is deemed State Significant Development (SSD) on the basis that it satisfies Clause 23(3) in Schedule 1 of the *State Environmental Planning Policy (State and Regional Development) 2011*.

This report has been prepared to support an SSD Application and provide documentation in support of a request for SEARs for the Proposal, which would inform the preparation of an EIS under Part 4 of the EP&A Act.

This report provides an outline of the existing site operations, statutory approvals and a description of the proposed development and the identification of key potential environmental issues that may be associated with the Proposal.

1.4 Existing Approvals

In November 1996, Blacktown City Council approved a metal recycling facility with a throughput capacity of 30,000 tonnes per annum (tpa) on the southern portion of 45 Tattersall Road. Since this time there have been a number of changes to the Proposal site to improve operation efficiency, safety and environmental impact. In 2001 throughput was increased to 90,000 tpa when the Land and Environment Court (LEC) approved the establishment of a metal shredder on the northern part of 45 Tattersall Road.

The Proposal site currently operates under SSD 5041 (the Original Approval) which was granted by DPIE on the 12th of November 2015. SSD 5041 allowed for:

- An increase in throughput from 90,000 tpa to 350,000 tpa
- Expansion of the Proposal site to include the neighbouring lot 23-43 Tattersall Road.

Subsequent to this approval, three (3) modifications have been approved as outlined in Table 3.

Table 3 Approved MODs

Modification	Description
Modification 1 (MOD 1)	Granted by DPIE on 6 July 2017, including amendment to the site layout, design of buildings and structures and alterations and additions to existing buildings and structures.
Modification 2 (MOD 2)	Granted by DPIE on 26 February 2018, including changes to the acoustic wall, site entrance and construction of an awning (went to LEC then was approved).
Modification 3 (MOD 3)	Granted by DP&E on 29 May 2019, including alterations and additions to processing equipment, extension to operational hours and administrative changes.

The works associated with these modifications have either been completed or are close to completion.

The approved operational hours for the RRF (as modified in MOD 3) are described in Table 4 below.

Table 4 Operational hours SSD 5041

Activity	Day	Hours
Oxy-acetylene torch cutting	Monday to Saturday	9 am to 3 pm
	Sunday and public holidays	Nil
Maintenance and cleaning	Monday to Saturday	9 pm to 6 am
	Sunday	24 hours
All other activities	Monday to Saturday	6 am to 9 pm
	Sunday and Public Holidays	Nil

1.5 Environmental Protection License

The Proposal site currently operates with the EPL No. 11555 outlined in Table 5.

Table 5 Current EPL

Approval number	Premises	Activity summary	Date of approval
EPL 11555	23-43 and 45 Tattersall Road, Kings Park NSW	• Metallurgical activities – scrap metal processing (100,000 to 350,000 tpa) • Waste storage – hazardous, restricted solid, liquid, clinical and related waste and asbestos waste.	• Licence issued: 16-Apr-2002 • Last license variation: 10-Dec-2018

1.6 Consultation

Consultation was undertaken with a number of government agencies at the time of preparation of the Original Approval. Agencies consulted included Blacktown City Council (Council), Environment Protection Authority (EPA) and Roads and Maritime Services (Roads and Maritime), among others.

In addition, extensive community consultation was undertaken as part of the Original Approval which included a letterbox drop to 1,000 surrounding residents, landowners and businesses. Other consultation activities included an information session at the Proposal site to provide an overview of the development proposed and obtain feedback from the local community and stakeholders.

On 7 November 2019, a scoping meeting was undertaken with DPIE representatives and the Applicant to discuss the Proposal. Key elements of the Proposal were presented during the meeting and a copy of the presentation has been provided to DPIE representatives. A summary of the key outcomes from the meeting and where each of these have been discussed within this report is provided in Table 6 below.

Table 6 DPIE Scoping Meeting Outcomes

Topic	Comment	Where addressed in this report
SSD **Proposed expansion**	The assessment should include data to show downtimes on each part of equipment.	To be provided by Sell and Parker as part of the assessment
	Weighbridge data must be provided to support stacking.	To be provided as part of the detailed Traffic and Transport Assessment (refer to Section 6.2)
	The worst case scenario should also be considered in the assessment.	Section 6.2 To be assessed in the EIS
	Confirm if there is a trade waste agreement in place.	Sections 1.2.1 & 7.2
	The assessment should consider the new fire safety guideline 'Fire safety in waste facilities' – Fire and Rescue NSW.	Section 7.3 To be assessed in the EIS
	The Proposal would involve a comprehensive traffic assessment to justify the proposed expansion. In addition, the assessment must consider traffic impacts at the nearest intersection as there has been community concern in this regard.	Section 6.2
	The final stockpile plan should be provided.	To be provided with the EIS
	The EIS should include a cumulative assessment of the environmental impacts of the Proposal and the current Pick n Payless application (SSD 8375).	Cumulative environmental issues to be assessed in the EIS would include: traffic, noise, and air quality and odour
	EPA should be consulted prior to the submission of the SSD Scoping Report (this report).	See section following this table
	Government agencies to be involved as part of this Proposal include (but are not limited to): Roads and Maritime, Blacktown City Council, Fire and Rescue NSW, EPA and Catchment Authority.	See section following this table
	The possibility of surrendering the approved DA to consolidate one consent would be considered.	To be considered in the EIS

As noted above, DPIE suggested to consult with EPA as part of the SSD application. The Applicant contacted EPA on 8 November 2019 to discuss the Proposal. A copy of the presentation to DPIE has been provided to EPA and a formal meeting has been scheduled on 27 November 2019 with Greg Sheehy, Director of Waste Compliance. Ongoing consultation with EPA and other relevant stakeholders will be undertaken during the preparation of the EIS.

The Applicant is committed to consulting with the local community and other stakeholders, including government agencies, regarding this Proposal. This will ensure that interested parties have the opportunity to understand the nature of the Proposal and can provide informed feedback.

During the preparation of the EIS the Applicant will consult with the following:

- Department of Planning, Industry and Environment (DPIE)
- Blacktown City Council
- EPA
- Roads and Maritime
- Sydney Water
- Fire and Rescue NSW
- Nearby landowners and occupiers that may be affected by the Proposal.

The EIS will describe the consultation process and the issues raised, and identify where the Proposal has been amended (as relevant) in response to these issues. Where amendments have not been made to address an issue, adequate explanation will be required in the EIS.

2. SITE LOCATION

2.1 Site Context

The Proposal site is located within the Blacktown Local Government Area (LGA), in an area characterised by general industrial development. Access to the Proposal site is from Tattersall Road, to which the Proposal site has approximately 240m of frontage. Tattersall Road is a two-lane road which connects to Sunnyholt Road to the east, and Vardys Road to the north-west, both of which are four lanes. Sunnyholt Road connects in turn to the M7, 1.2 km to the north of the Tattersall Road intersection. The area of the Proposal site is approximately 6.4 hectares.

Key features of the area surrounding the Proposal site include:

- Tattersall Road to the north, with light and general industrial activities on the opposite side
- An intermittent drainage channel to the east of the Proposal site, which connects directly to Breakfast Creek – a highly modified watercourse which flows along the southern boundary of the Proposal site. Both watercourses separate the Proposal site from other industrial developments
- An automotive wrecking and recycling facility to the west with further industrial activities beyond
- The nearest residential development is approximately 300 metres to the east, with industrial structures and Sunnyholt Road between the Proposal site and these residential receivers.

2.2 Site Description

The Proposal site is currently used as a metal recycling and processing facility and includes several structures and associated infrastructure including:

- Warehouses
- Offices
- Plant and equipment
- Water management infrastructure (including a floc pit, detention/irrigation pond, sludge bund, clean water tanks and stormwater detention basin)
- Roads and carparking.

External areas of the Proposal site are hardstand and bunded. All surface water is captured in the detention basin at the rear of the Proposal site and treated through the water treatment system. Scrap metal and recycled material are positioned on site in accordance with the approved stockpile management plan.

The Proposal site includes elements that have been recently constructed as approved under SSD 5041 and subsequent modifications, including:

- Reconfiguration of the Proposal site to include 23-43 Tattersall Road
- The replacement of the approved dual-entry weighbridge structure with a single-entry weighbridge
- Relocation of the weighbridge for outgoing vehicles
- Construction of the non-ferrous processing enclosure and covered conveyor

- Increase in height of the acoustic wall along the western edge of the Proposal site from 8m to 10m, and replacing the precast concrete panels and mesh with steel cladding
- Removal of existing two storey building and weighbridge on 45 Tattersall Avenue
- Changes to plant including conversion of an existing shear, realignment of the overhead conveyor and relocation of the pre-shedder.

The location of the Proposal site and local area is shown in Figure 2 above.

3. PROPOSAL NEED

3.1 China's National Sword Policy

In March 2018 the Chinese Government introduced new import restrictions on 24 types of recycling commodity, reducing the maximum allowable contamination in those streams from 5–10% to between 0.5% and 1%, depending on the material. For many commodity types the National Sword Policy contamination limits effectively constitute a ban on exporting to China as it is not financially feasible to separate them to that degree. For scrap metals the key limits are:

- 1% – Non-ferrous
- 0.5% – Ferrous
- 0.5% – Waste electric motors, wires and cables, metal and appliance scrap, smelt slag
- 0.3% – Automobile scrap.

Australia's exported 750,000 tonnes of recyclables to China[1] in 2017-18, of which 156,000 tonnes were metals[2]. National Sword has constricted this flow and disrupted the global market for recyclable material, with countries following China's lead including Thailand, Vietnam, Malaysia, India and Indonesia.

Global non-ferrous markets have been particularly hard hit, with high purity material essential to bolster sales. There are no regularly published figures on Australian export of scrap metal, but proxy figures for non-ferrous metal from the Institute of Scrap Recycling Industries indicate US exports of copper and copper alloy scrap to mainland China during January to July 2018 were down 41 per cent compared to the same period in 2017. Aluminium scrap fell 26 per cent in the same period[3].

In addition, the Proposal represents an opportunity to respond to the forthcoming export ban agreed by the Council of Australian Governments (COAG). Without an increase to recycling capacities in Australia, scrap metal that was previously exported to China may end up in landfill. The Proposal would maximise the capability of an existing RRF as well as further reducing the volume of scrap metal going to landfill.

This unforeseen tightening of export restrictions is driving global investment in advanced separation equipment and is the key driver for the Proposal. As mentioned above, the Applicant currently holds license number A036040008 issued by the AQSIQ agency of the Chinese Government, allowing the export of scrap metal to China.

The Proposal aims to increase the RRF's throughput limit while optimising the efficiency of the processes at the Proposal site. The Proposal would assist in achieving the higher recycling contamination standards prescribed by China's National Sword Policy.

3.2 Alignment with Waste Policy

The following is a list of relevant policies that are in place to guide waste management practices for the Proposal:

- *China National Sword Policy* (as noted above)
- *NSW Waste Avoidance and Resource Recovery Strategy 2014-21*

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[1] Including Hong Kong and Macau
[2] Data on exports of Australian wastes, 2019, Blue Environment for the Australian Government
[3] http://www.recyclingtoday.com/article/state-of-scrap-trade/

- *National Waste Policy: Less Waste, More Resources*
- *Western Sydney Regional Waste Avoidance and Resource Recovery Strategy 2017 – 2021*
- *NSW Circular Economy Policy: Too Good To Waste*.

Relevant waste policy has been considered throughout the planning and approval process to ensure the objectives of the Proposal align to the strategic vision for waste and recycling within NSW and Australia. The Proposal represents a positive contribution to the circular economy in the NSW and Australia by increasing the capacity of an existing facility and recycling additional scrap metal that would otherwise go to landfill. The Proposal does not alter the consistency of the Original Approval with these policies and would continue to align with their intentions. As noted above, the Proposal would involve an increase in the quantity of scrap metal to be recycled with no changes required on the types of material recycled on the Proposal site.

3.3 Alternatives and Options

3.3.1 Alternative Site

The Proposal relies on an expansion to the existing RRF located at 23-43 and 45 Tattersall Road to improve the productivity of the facility and improve the efficiency of scrap metal recycling. The Proposal could therefore not be undertaken at an alternate site without requiring the complete construction and operation of a new RRF. The Proposal is therefore not considered severable from the existing RRF and therefore cannot be located at an alternative site.

Prior to construction of the existing RRF, the Applicant previously undertook a comprehensive investigation of sites across the Sydney metropolitan area to find a suitable site for the development of an RRF. The Proposal site was identified as the most suitable site for a number of reasons, including convenient road access for heavy vehicles, appropriate industrial zoning as evidenced by current resource recovery operations and proximity to waste generation sources.

Based on the above factors, the Proposal site has been considered, and remains the most suitable location for the Proposal.

3.3.2 Without the Proposal

If the Proposal does not proceed in any form, the existing RRF would continue to operate under its current arrangement. This would limit the volume of scrap metal that could be received, and consequently, recovered as a result of the Proposal. Maximising the operational throughput is necessary to meet growing demand for recycling facilities due to the restrictions set by China's National Sword Policy, to reduce the amount of waste going to landfill and to meet state and strategic resource recovery targets.

Therefore, the Proposal would considerably improve the operational efficiency and capacity of the existing RRF while achieving greater waste industry and recycling targets. Therefore, based upon the justification above, it is considered that to proceed with the Proposal would be the best outcome.

3.3.3 Capacity Analysis

The Applicant has considered a number of potential options with a view to increasing the efficiency of scrap metal recycling and management, and ensuring that the layout of the Proposal site has been optimised.

The throughput capacity analysis aims to identify the maximum feasible throughput, in tonnes per annum (tpa), that the Proposal site could accommodate based on the existing (and approved) infrastructure, processes, operating hours (Table 4 above) and general site layout.

A capacity analysis has been undertaken based upon processing and vehicle capacities at the existing RRF. This analysis looked at three primary components that affect the throughput capacity of the Proposal site, including:

- Capacity of processing plant and equipment
- Ability of the Proposal site to accommodate vehicles movements associated with throughput, including queueing, stacking and tipping (see Figure 3 below)
- On site storage capacity (stockpiles).

Based on the capacity analysis, an increase in throughput to 600,00 tpa would be within the limits of the existing approved infrastructure, including existing plant and equipment. As noted previously, the Proposal would not require construction of any additional infrastructure or alter to operational hours. Only minor operational adjustments would be undertaken as part of the Proposal to accommodate the increased throughput, such as internal traffic flows and scheduling. This would be assessed in detail in the EIS supporting the SSD Application.

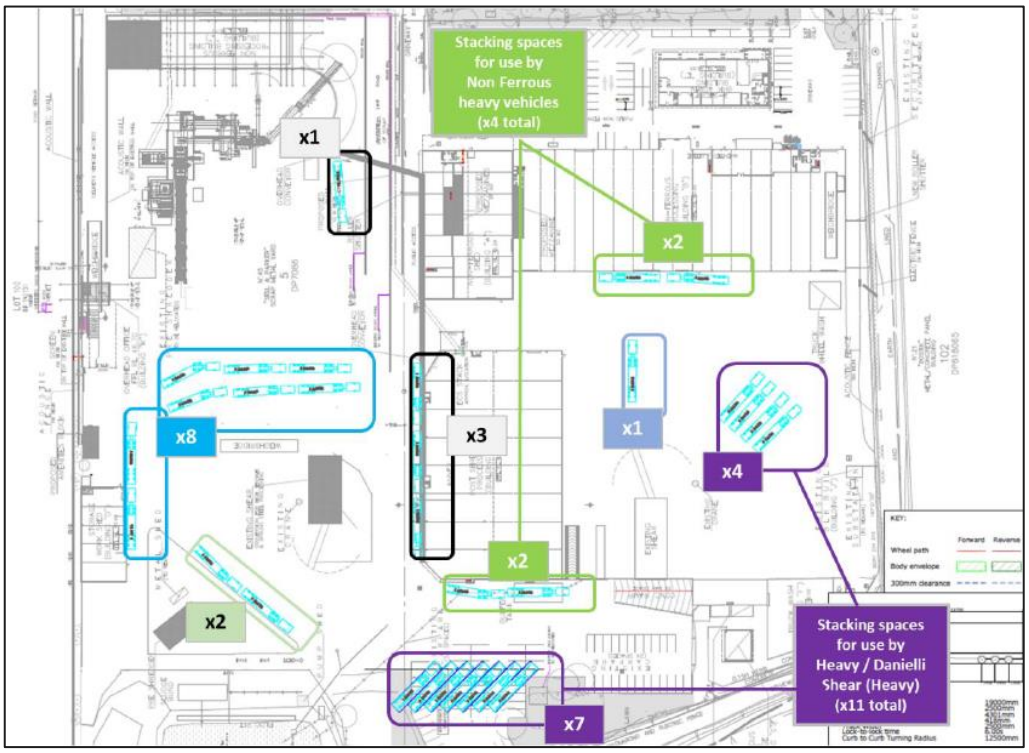

Figure 3 Available stacking spaces

In addition, a preliminary swept paths analysis has been undertaken for vehicles accessing operational locations (e.g. tip floors, collection 'bays') and stacking spaces.

These swept paths are included in Appendix A and demonstrate that all vehicles would be able to safely make the required movements around the Proposal site.

4. PROPOSAL DESCRIPTION

This section provides a description of the Proposal. It is noted that the description provided below presents only an indicative and conceptual description of the Proposal, and that the final design of the Proposal may be altered from this description.

The Proposal has been designed having regard to improving the existing on-site operations and maximising resource recovery tasks during the approved operational hours.

4.1 Proposal Overview

The Proposal is to increase the scrap metal processing throughput at the Proposal site from 350,000 to 600,000 tpa.

The existing infrastructure at the Proposal site has the capacity to accommodate the increased throughput. The Proposal would not require any construction works and would not change the mix of materials currently received at the RRF. However, adjustments to site management practices would be required in terms of internal vehicle movements and stacking locations to allow the increased throughput.

The Proposal would utilise existing road infrastructure, other utility installations and stormwater discharge points.

Figure 4 below shows the operational layout of the Proposal.

LEGEND

- Site boundary
- Operational area
- Cadastre
- Watercourse

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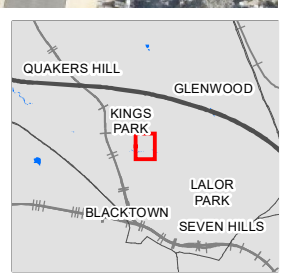


Figure 4 – Operational layout of the Proposal

4.2 Construction

The Proposal would utilise existing approved infrastructure. Therefore, no construction activities would be required as part of the Proposal.

4.3 Operation

The Proposal would facilitate an increased throughput from 350,000 to 600,000 tpa of scrap metal.

4.3.1 Plant and Equipment

Metal scrap is predominately recycled on the Proposal site through the existing six (6) key pieces of processing machinery, namely:

- Pre-shredder
- Shredder
- Non-ferrous baler
- Lindermann Shear
- Danieli Shear
- Oxy-cutters.

Operational areas and the location of existing processing plant equipment are shown in Figure 5.

The location of these items is also shown in the approved site layout in Appendix B.

No changes to plant and equipment, or their location are required for the Proposal.

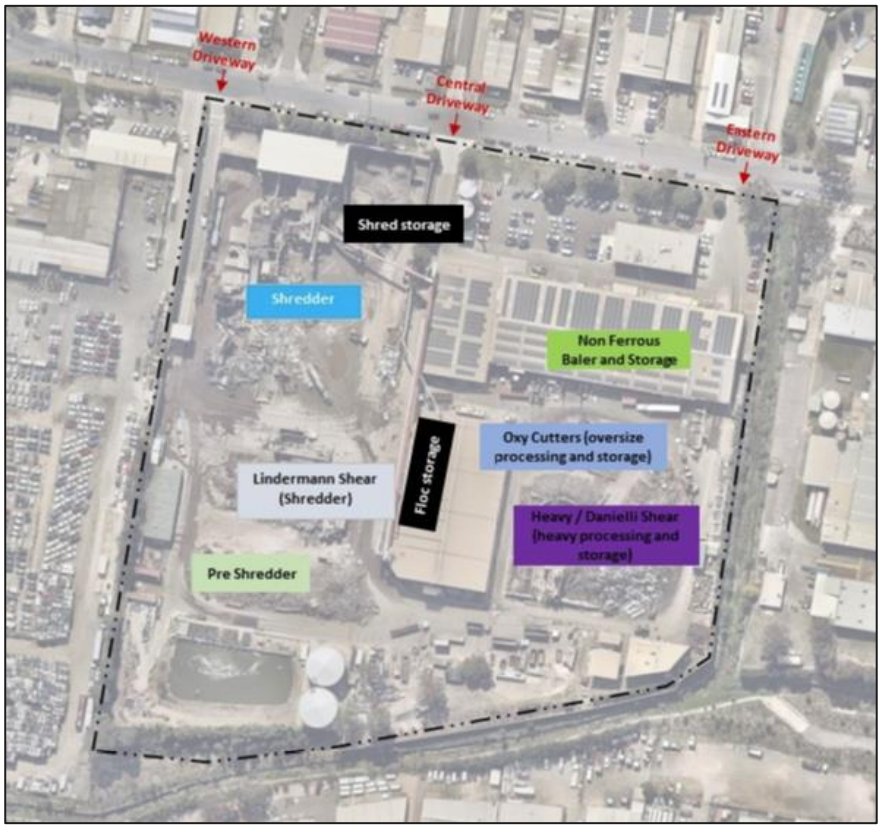


Figure 5 Operational areas and location of plant and equipment

4.3.2 Traffic movements and stacking

To facilitate the increased throughput, a number of stacking spaces would be provided to enable trucks waiting to access operational areas. Accordingly, some stockpiles would be refined to accommodate these stacking spaces. This would be assessed as part of the EIS.

5. PLANNING CONSIDERATIONS

5.1 Statutory Planning Assessment

5.1.1 Relevant Legislation

Table 7 provides an overview of the key legislation and planning instruments applicable to the Proposal. A detailed assessment of all the relevant legislation would be undertaken as part of the EIS.

Table 7 Legislation applicable to the Proposal

Legislation	Associated environmental concerns	Approval or assessment requirement
Commonwealth		
Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)	Impacts to Matters of National Environmental Significance (MNES), particularly disturbance to listed threatened species, ecological communities and/or migratory species, and impact(s) on Commonwealth land	The Ecological Impact Assessment prepared by Environmental Resources Management Australia (ERM) as part of the EIS for the Original Approval identified that the existing RRF is unlikely to impact on threatened species, populations or ecological communities and their habitats. In addition, a search of the EPBC Protected Matters Search Tool was undertaken on 11 November 2019 for the Proposal site and a one km buffer. The search did not identify protected matters within the Proposal site or surrounds. The Proposal is not anticipated to significantly impact any MNES and therefore, referral to the Commonwealth Minister for the Environment is not considered warranted.
State		
EP&A Act *EP&A Regulation* *State and Regional Development SEPP*	Planning approval pathway determination and any potential impacts on the environment	Part 4 of the EP&A Act provides for control of 'development' that requires development consent from the relevant consent authority. Division 4.7 of Part 4 provides for control of SSD where the Minister for Planning and Public Spaces (or delegate) is the consent authority. The Proposal would be considered as SSD under Clause 23 (waste and resource management facilities) of Schedule 1 of the State and Regional Development SEPP, which refers to: *(3) Development for the purpose of resource recovery or recycling activities that handle more than 100,000 tonnes per year of waste.*

Legislation	Associated environmental concerns	Approval or assessment requirement
State Environmental Planning Policy (Infrastructure) 2007)	Land use permissibility and assessment of traffic impacts	Section 121 of the ISEPP facilitates the development for the purposes of waste or resource management facilities to be undertaken, with development consent within a 'prescribed zone' being IN1 General Industrial. The subject site is zoned IN1 General Industrial under the *Blacktown Local Environmental Plan 2015* (Blacktown LEP). Therefore, development of waste or resource management facilities would be permissible on the Proposal site with development consent. In addition, the ISEPP identifies development that is considered to be Traffic Generating Development. As per Schedule 3 of the ISEPP, a recycling facility or transfer station of any size or capacity is considered to be a Traffic Generating Development. The EIS will assess traffic impacts in accordance with ISEPP.
Protection of the Environment Operations Act 1997 (POEO Act)	Impacts of the operation of the Proposal relating to air quality, noise emissions and discharge of polluted water	As noted in Section 1.5, an EPL (EPL No. 11555) was issued for the premises 23-43 and 45 Tattersall Road on the 16th of April 2002 under Section 55 of the POEO Act. The EPL allows metallurgical activities to take place on site as a scheduled activity up to 350,000 tonnes per annum. The Proposal would represent an increase in the approved throughput and therefore, an amendment to the EPL would be required.
Contaminated Land Management Act 1997 (CLM Act) *State Environmental Planning Policy No. 55-Remediation of Land* (SEPP 55)	Disturbance of contaminated land and potential for further soil contamination	The EIS for the Original Approval included a Phase 1 Environmental Site Assessment prepared by ERM. The assessment concluded that no further investigation is required, and potential impacts would be managed in accordance with the existing Construction and Operation Environment Management Plans for the existing RRF. The Proposal would not alter contamination management measures.
National Parks and Wildlife Act 1974 (NPW Act)	Disturbance of any objects or places of Aboriginal heritage significance	Under Section 4.41 of the EP&A Act development applications assessed as SSD do not require an Aboriginal heritage impact permit (AHIP) (under section 90 of the NPW Act). The EIS for the Original Approval included an Aboriginal Heritage Impact Assessment for the RRF site. The assessment identified no known objects or places of Aboriginal heritage significance within the boundaries of the site.

Legislation	Associated environmental concerns	Approval or assessment requirement
		The assessment concluded that given the RRF site is extensively disturbed it is highly unlikely that objects or places of Aboriginal heritage significance would be impacted by the existing RRF. As the Proposal does not include any physical works, this remains the case.
Biodiversity Act (2016)	Disturbance to listed threatened species and ecological communities	As mentioned above, the EIS for the Original Approval included an Ecological Impact Assessment for the Proposal site and surrounds. The Proposal site would not require vegetation clearance, therefore the Proposal would not result in a change to the impact assessment as presented in the EIS for the Original Approval.
Biosecurity Act 2015	Biosecurity matter, carriers or potential carriers, including the spread and impact of weeds	The Proposal site is unvegetated and it is not anticipated that the Proposal would have any biosecurity risks or effects on the spread or impact of weeds.
Fisheries Management Act 1994 (FM Act)	Disturbance to aquatic flora and fauna	The Proposal would not result in any disturbance to aquatic flora and fauna.
Water Act 1912 (Water Act) *Water Management Act 2000* (WM Act)	Disturbance of groundwater aquifers, impacts to flooding behaviour and/or water quality of surrounding water bodies	Under Section 4.41 of the EP&A Act, development applications assessed as SSD do not require a permit under section 89, 90 or 91 of the WM Act. Breakfast Creek is located at the rear boundary of the Proposal site and is highly modified and vegetated. As mentioned previously, there is no discharge of water to Breakfast Creek from the Proposal site. Therefore, the Proposal would not result in any impacts to Breakfast Creek as noted in Section 1.2.1 of this report.
Roads Act 1993 (Roads Act)	Impacts of the construction and/or operation of the Proposal on traffic flows and works to public and private roads	The Proposal would result in an increase to traffic flows on the surrounding roads and on-site. Roads and Maritime and Blacktown City Council would be consulted during the preparation of the EIS. A detailed traffic and transport assessment would be undertaken for the Proposal as noted in Section 6.2 of this report.
Heritage Act 1977 (Heritage Act)	Disturbance to any object that is of state or local heritage significance	Under Section 4.41 of the EP&A Act, development applications assessed as SSD do not require a permit under section 139 of

Legislation	Associated environmental concerns	Approval or assessment requirement
		the Heritage Act. The EIS for the Original Approval included a Historical Heritage Assessment for the impacts of the existing RRF. The assessment identified that it was highly unlikely that the RRF would impact on heritage values. The Proposal would not result in any additional impacts to items of Non-Aboriginal heritage, beyond those approved in the EIS.
Waste Avoidance and Resource Recovery Act 2001 (WARR Act) *Protection of the Environment Operations (Waste) regulation 2005*	Waste management and potential opportunities for diversion of waste from landfill	The Proposal would promote resource recovery and diversion of scrap metal to landfill. The Proposal strongly aligns with the intentions of the WARR Act, as would be further identified within the EIS.
Rural Fires Act 1997 (Rural Fires Act)	Bushfire management/prevention and ensuring the site is suitably protected from the threat of bushfires	Under Section 4.41 of the EP&A Act development applications assessed as SSD do not require a bush fire safety authority (under section 100B of the Rural Fires Act). An assessment undertaken against the relevant factors for bushfire risk was presented in the EIS for the Original Approval. It was concluded that the Original Approval would not impede the protection of any nearby buildings and infrastructure from bushfire. The Proposal would not result in changes to the assessment as presented in the EIS of the Original Approval.
State Environmental Planning Policy No. 33- Hazardous and Offensive Development (SEPP 33)	Management of hazardous and dangerous goods	A Preliminary Hazard Analysis (PHA) was prepared as part of the EIS for the Original Approval. The Proposal would not result in a change to the approved land use for the Proposal site. However, the Proposal is likely to change the management of hazards and risk as presented in the Original Approval. Therefore, an updated hazard analysis would be undertaken for the Proposal, the findings of which would be presented in the EIS.
Local		
Blacktown Local	Impact on the environment and the built	The EIS for the Original Approval included consideration of matters within the Blacktown LEP. The external configuration of the

Legislation	Associated environmental concerns	Approval or assessment requirement
Environment Plan 2015 (Blacktown LEP)	form of the Blacktown Local Government Area	approved development and site layout will not be altered by this Proposal, and as such no additional assessment matters are triggered under the Blacktown LEP.
Blacktown Development Control Plan 2008 (Blacktown DCP)	Impact on the environment and the built form of the Blacktown Local Government Area	As the Original Approval and Proposal are SSDs under Part 4, Division 4.1 of the EP&A Act, consideration of the Blacktown DCP is not required. However, the EIS for the Original Approval included consideration of the Blacktown DCP for matters such as vehicle access and circulation, car parking requirements, development of flood prone land, development in industrial zones and landscaping. The Proposal would not involve any construction activities and therefore, there would be no changes to compliance with the Blacktown DCP.

6. KEY ENVIRONMENTAL ISSUES

6.1 Overview

A preliminary assessment has been undertaken to identify the potential environmental issues associated with the establishment of the Proposal. Table 8 provides a list of the environmental aspects that are likely to arise from the Proposal, and a reference to relevant sections in this background document where further context is provided.

Issues requiring further assessment have been separated into 'key' and 'other' issues. Key and other issues have been further assessed throughout Sections 6 and 7 respectively.

Table 8 Preliminary assessment of environmental issues associated with the Proposal

Environmental Aspect	Preliminary Screening	Relevant Sections
Key issues		
Transport, Access and Parking	Traffic, access and car parking, including truck movements within and surrounding the Proposal site, vehicle queuing, car parking and the operation of the proposed site access and egress.	Section 6.2
Air Quality and Odour	Air quality and odour impacts on sensitive receivers and surrounding development, including dust, flue gases and vehicle emissions.	Section 6.3
Noise and Vibration	Noise from traffic and resource recovery operations could result in impacts to surrounding receivers.	Section 6.4
Other issues		
Waste Management	The Proposal would not generate any construction waste. During operation, the Proposal would handle and generate waste in accordance with current practices, however this has a low potential to result in environmental impacts if not appropriately managed.	Section 7.1
Stormwater, Soil and Water	Measures required to manage stormwater, soil and water on site as a result of increasing the operational capacity would generally be in accordance with current practices, however there is a low potential for further environmental impacts.	Section 7.2
Hazards, Risks and Fire and Incident Management	Storage and handling of hazardous and dangerous goods may impose risks on site to people and surrounding environment. Identification of necessary upgrades to environmental protection equipment, including fire management and containment measures.	Section 7.3
Issues not requiring further assessment		
Contamination	The Proposal site is within an established industrial area and the Proposal will not change the existing land use of the site. Therefore, no additional impacts	-

Environmental Aspect	Preliminary Screening	Relevant Sections
	are anticipated to those identified in the previous contamination assessment for the Original Approval.	
Biodiversity	As discussed in Section 5 of this report, the Ecological Impact Assessment prepared as part of the EIS for the Original Approval identified that the existing RRF is located within an industrial area with limited ecological values and is unlikely to have a significant impact on biodiversity. As the Proposal does not involve any physical works on the Proposal site it is considered that a Biodiversity Development Assessment Report (BDAR) is not required. Accordingly, a BDAR waiver application has been submitted with this report.	-
Heritage	Previous assessments on site did not identify any items or areas of Aboriginal heritage or non-Aboriginal heritage significance within, or in close proximity to, the Proposal site. There is limited potential for the discovery of unexpected items of heritage value as a result of significant disturbance at the Proposal site. Therefore, an Aboriginal Cultural Heritage Assessment Report (ACHAR) waiver application has also been submitted with this report.	-
Socio-Economic	The business operation would operate in a similar manner to the current facility and would result in socio-economic benefits to the local economy. This could be attributed to the creation of jobs, contribution of taxes and the purchasing of goods in the local area wherever practicable.	-

All potential environmental impacts will be considered further as part of the EIS, including a detailed assessment of the 'key' and 'other' issues.

Potential environmental impacts associated with the Proposal will be considered and if required, managed through the implementation of appropriate mitigation and control measures.

6.2 Transport, Access and Parking

6.2.1 Existing Environment

The Proposal would be located at the Proposal site. As noted previously, the existing RRF currently processes 340,000 tpa. On average, operational activities generate approximately 290 vehicles per day or 19 vehicles per hour across a 15-hour workday.

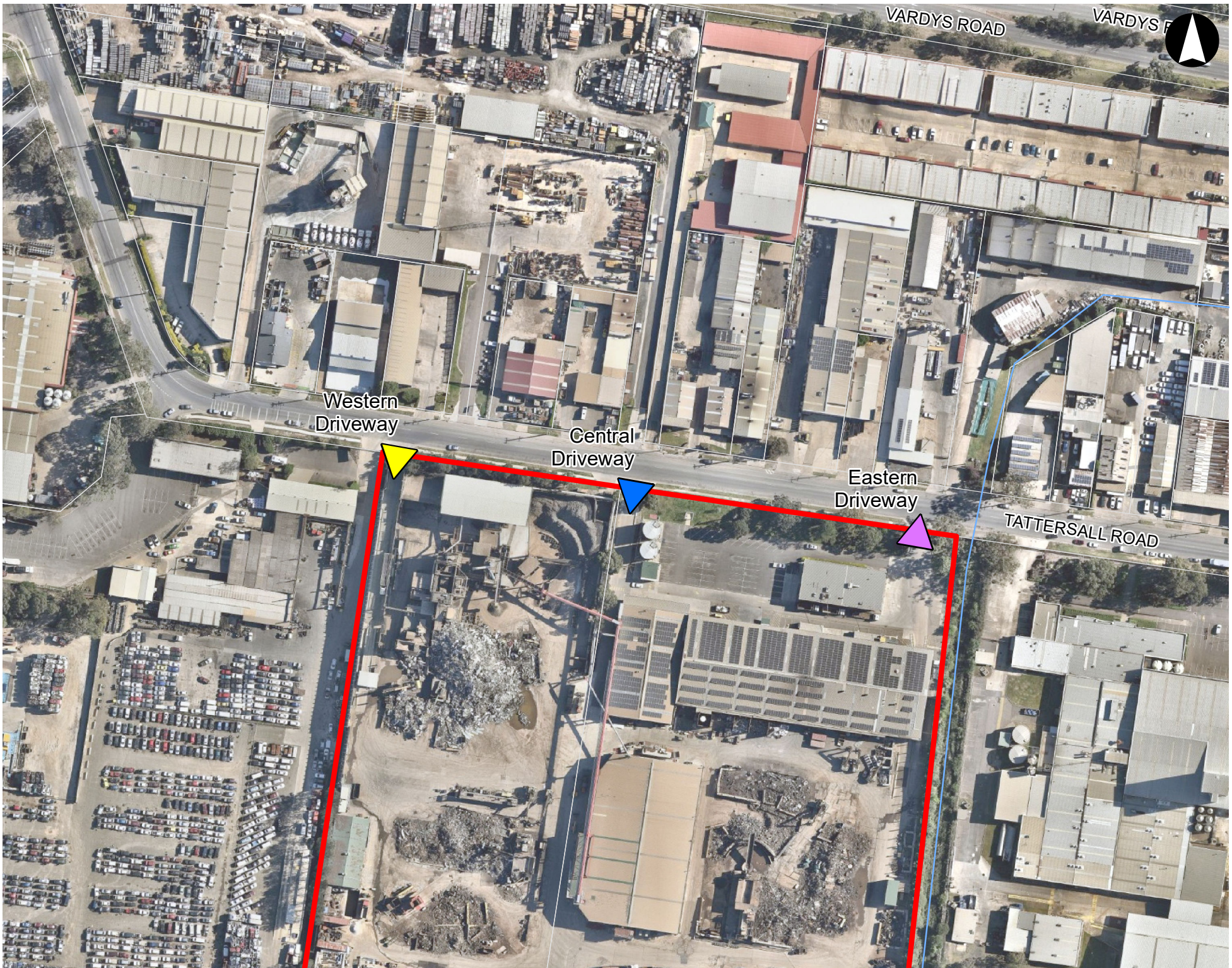
The types of vehicles transporting material to the Proposal site include light rigid vehicles (i.e. utes and small delivery vans) and up to 19 metres semi-trailer trucks. These vehicles access the Proposal site using separate access driveways as seen in Figure 6 below. The Proposal site is accessed via three driveways at the southern side of Tattersall Road, of which two are ingress driveways and one is an egress driveway.

Site access arrangement is as follows:

Table 9 Access arrangement

Driveway	Arrangement
Western	• Vehicles delivering non-ferrous material with a tare weight greater than 10t (i.e. HRVs, Semis, etc.)
Central	• Vehicles delivering non-ferrous material with a tare weight less than 10t (i.e. up to and including MRVs) • Vehicles arriving to the Proposal site to collect floc and shred material. These vehicles would collect multiple loads from the Proposal site per day. Each vehicle would enter via the western driveway when first arriving at the Proposal site to establish a tare weight, which would be used for subsequent trips throughout the day. These vehicles would weigh out via the eastern driveway.
Eastern	• Egress of all vehicles would be via the eastern driveway.

The Proposal site access arrangement is illustrated in Figure 6.



LEGEND

Site boundary
Cadastre
Watercourse

Access point
Western Driveway
Central Driveway
Eastern Driveway

ARCADIS AUSTRALIA PACIFIC PTY LTD
ABN 76 104 485 289
Level 16, 580 George St | Sydney NSW 2000
P: +61 (0) 2 8907 9000 | F: +61 (0) 2 8907 9001
Coordinate System: GDA 1994 MGA Zone 56

Aerial imagery supplied by Nearmap (27 Oct 2019)
Date issued: November 18, 2019
1:2,000 at A3

ARCADIS

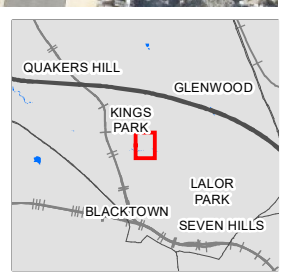


Figure 6 – Proposal site access arrangement

6.2.2 Summary of Potential Environmental Impacts

The Proposal would result in an increase in truck movements associated with transportation of scrap metal to the Proposal site.

The potential impacts of the additional operational traffic from the Proposal on the surrounding road network may include:

- Increased heavy and light vehicle traffic may impact traffic movement
- Changes to local intersection performance
- Potential for limited queuing traffic outside the site access point
- Impacts to road safety.

Notwithstanding, the Proposal would represent minimal traffic impacts and there would be no significant traffic disruptions as a result of the Proposal. The Applicant is confident the there would be no significant traffic impacts affecting the general public and this would be demonstrated in a detailed traffic assessment as part of the EIS.

6.2.3 Proposed Further Assessment

The EIS will be accompanied by a comprehensive Transport Impact Assessment that would determine the impacts associated with the Proposal. It would also provide consideration of the following aspects:

- The current and future capability of local and regional road infrastructure
- The current and future capacity of the Proposal site to accommodate parking
- The type and frequency of heavy vehicles proposed to utilise the Proposal site
- Modelling of key intersections and details of heavy vehicle routes
- Vehicle turnaround times including consideration of all vehicle movements (e.g. tipping, stacking and manoeuvring, collection, weigh in and weigh out)
- The suitability of the site layout to accommodate the predicted heavy vehicle movements to/from the site
- The development of a Traffic Control Plan (TPC) for the Proposal site
- Details of measures to prevent queuing of vehicles on Tattersall Road
- Details of the internal road layout network, access and egress, pedestrian movements, and parking in accordance with Australian Standards.

The EIS would include recommendations to mitigate the likely impacts of the Proposal on the road network including manoeuvring arrangements, operational management plans and the suitability of the existing road network to accommodate the Proposal.

In addition, the Proposal has been identified as a Traffic Generating Development, as per Schedule 3 of the ISEPP. It is noted that recycling facilities and waste transfer stations of any size or capacity are classified as a Traffic Generating Development. Appropriate consultation with Road and Maritime and Blacktown City Council would be undertaken to satisfy the requirements of the ISEPP.

6.3 Air Quality and Odour

6.3.1 Existing Environment

An assessment of air quality and odour impacts was undertaken by ERM within the EIS to support the Original Approval. The assessment identified the following:

- The highest predicted annual average concentrations for Total Suspended Particulates (TSP) dust deposition and annual average PM_{10} concentrations at each of the receptors is below the assessment criteria
- The maximum predicted 24-hour average PM_{10} concentration together with the maximum background concentration results in levels that exceed the assessment criteria at the sensitive receptors due to the elevated background ambient air quality concentrations in the area
- The peak odour concentration at the receptors is below assessment criterion
- The highest annual average and 1-hour average NO_2 concentrations at the receptors are below the respective assessment criteria
- The toxic air pollutants concentrations are found not to exceed the Work Safe 10-hour adjusted Time Weighted Average (TWA) at offsite locations within the industrial estates where the site is located and found no to exceed the human health assessment criteria at the nearest sensitive receptors.

Further consideration was given to air quality and odour impacts within the Modification Reports for the three approved MODs. The assessments undertaken as part of each of the approved MODs found no changes to the air quality outcomes and odour impacts identified in the Original Approval. As mentioned in Section 1.2.1, a number of actions have been undertaken to improve air quality performance. Some of these include:

- The storage for shred residual materials has been relocated to the centre of the Proposal site in a fully enclosed building
- An Emissions Collection System (ECS) has been installed at the Hammermill to the satisfaction of the EPA and DPIE
- A larger shear (1400T Shear) has been installed at the Proposal site which meets improved air quality and noise standards.

6.3.2 Summary of Potential Environmental Impacts

Due to the proposed increase to operational processing included within the Proposal, there is potential for an increase in dust, particulate and odour emissions. The emission sources and major pollutants identified at the Proposal site are listed below. Particulate emissions are likely to be generated from:

- Loading/unloading of scrap metal
- Scrap metal handling/sorting/processing activities
- Onsite vehicle movements
- Wind erosion from onsite stockpiles and any exposed areas.

Notwithstanding the above, the Proposal site is situated in an established industrial area and therefore it is likely the contribution of pollutants and the extent of impact on air quality associated with the increased operations of the Proposal would be minimal.

As noted above, the storage for shred residual materials has been relocated to the centre of the Proposal site in a fully enclosed building to control floc. An ECS has been installed at the Hammermill to achieve the air quality control performance. Additionally, a larger shear has been installed to achieve improved air quality standards.

The existing RRF only accepts and recycles scrap metal. Therefore, it is considered that odour impacts on surrounding sensitive receivers would be negligible as a result of the Proposal.

6.3.3 Proposed Further Assessment

An updated air quality assessment would be conducted as part of the EIS to evaluate the impact of key pollutants as a result of increasing the operational capacity at the Proposal site.

The updated assessment would consider the cumulative particulate matter impacts and identify any additional management measures required.

6.4 Noise and Vibration

6.4.1 Existing Environment

The noise environment at the Proposal site is typical of an industrial area. The background noise levels are largely influenced by the surrounding industries, including retail and commercial industrial areas, and vehicular noise on the surrounding road network.

The closest residential receivers to the Proposal site are located approximately 300m east of the Proposal site. These residential receivers are on the eastern side of Sunnyholt Road, North West Bus Transitway and Anthony Street, and sheltered by an acoustic wall along Anthony Street.

6.4.2 Summary of Potential Environmental Impacts

Operational noise would be generated by plant and equipment as well as truck movements (within the Proposal site and the immediate surrounds). However, given the background noise and intervening structures, noise impacts to sensitive receivers are expected to be negligible as a consequence of the Proposal.

The Proposal would operate with existing infrastructure as previously discussed. It is anticipated that the noise levels from existing machinery would not change as a result of the Proposal. However, the frequency would increase as the Proposal site would be operating at a higher capacity.

As discussed in Section 1.2.1 above, existing plant and equipment include engineering controls to mitigate noise. In addition, acoustic panelling has been installed at all boundaries of the Proposal site to reduce impacts on surrounding sensitive receivers. The Proposal would operate within the approved hours and therefore noise impacts are considered minor.

6.4.3 Proposed Further Assessment

Further assessment of noise and vibration as part of the EIS for the Proposal is to include a noise and vibration assessment to determine the potential impacts of the operations of the Proposal at surrounding receivers, including:

- Establish existing ambient and background noise levels at the potentially most affected off-site receiver locations
- Identify nearby sensitive receptors, land use and terrain
- Identify sound power levels for each piece of equipment or process
- Assess operational noise impacts in accordance with the *Noise Policy for Industry* (2017)
- Assess traffic noise consistent with EPA's *Road Noise Policy*

- Identify feasible and reasonable noise mitigation measures to address noise exceedances at sensitive receivers.

The EIS would include recommendations to mitigate any noise and vibration impacts of the Proposal on surrounding sensitive receivers.

7. OTHER ISSUES

This section provides a preliminary assessment of other environmental issues which are considered to result in a negligible or minor change as a result of the Proposal.

While not key issues, further assessment would be undertaken as part of any future environmental assessment for the Proposal. Any environmental management and safeguard measures required to minimise and mitigate impacts would be documented as part of the EIS.

7.1 Waste Management

7.1.1 Existing Environment

As noted previously in this report, the existing RRF operates under an EPL which authorises resource recovery (metallurgical activities) and waste storage. The existing EPL limits the recycling of scrap metal to 350,000 tpa.

The process for tracking, monitoring and recording the material movement on site includes the recording of quantity, type and source of scrap metal received on site. Waste management practices currently employed throughout the operation of the RRF would facilitate the maximisation of reuse and resource recovery opportunities, and minimise impact on the surrounding community and environment.

7.1.2 Summary of Potential Environmental Impacts

The Proposal would involve an increase to waste (scrap metal) management which, which if not managed appropriately have the potential to result in environmental impacts. As noted previously, the Proposal would not require the construction of additional infrastructure and therefore, there would be no changes to the mix of materials currently received at the Proposal site.

Operations at the Proposal site would be business as usual. Therefore, the Proposal would not generate other types of waste to those identified in EPL 11555. As mentioned in Section 1.2.1 above, engineering controls have been implemented for tracking, monitoring and recording of material movement onto and off site.

7.1.3 Proposed Further Assessment

Further assessment of waste management as part of the EIS for the Proposal is proposed to include the following:

- Documentation of how waste streams are to be managed on site and in the context of regulatory obligations under the POEO Act and the *Waste Avoidance and Resource Recovery Act 2001*
- A resource and waste management assessment would be undertaken as part of the EIS to determine the potential impacts of the operations of the Proposal. The assessment would:
  - Identify waste streams generated during operation of the Proposal
  - Assess waste management impacts associated with the operations of the Proposal
  - Identify management and mitigation measures for resource use and waste across the Proposal including disposal sites and transport impacts
  - Include the preparation of an updated Waste Monitoring Management Plan that reflects the increase of waste processing considered for the Proposal.

7.2 Stormwater, Soil and Water

7.2.1 Existing Environment

As discussed in Section 1.2.1, the Water Management System (WMS) at the Proposal site has been redesigned as part of the Original Approval to achieve compliance with EPA requirements. The revised design no longer involves controlled discharge to Breakfast Creek. Any site-controlled discharge, other than stormwater flows, is undertaken in accordance with the Sydney Water Trade Waste Permit (Conditional Consent 39940).

In addition, the revised WMS includes a dirty water transfer buffer tank and a rising main to the existing retention basin. A validation program to test retention basin integrity has been undertaken in consultation with the EPA and no issues have been identified. Contingency protocols have been implemented should there be an event where the discharge criteria are exceeded. For example, rear yards can be utilised as capture basins to minimise off site discharge during intensive rainfall events.

Further assessment undertaken as part of the MODs within their respective Modifications did not identify any changes to the soil and water impacts of the Proposal as presented within the Original Approval.

7.2.2 Summary of Potential Environmental Impacts

The Proposal is unlikely to result in changes in the types and quantities of potential contaminants as a result of increasing the operational capacity of the facility.

It is anticipated that the Proposal would not result in significant increases in water usage and stormwater runoff on site. Therefore, the Proposal would utilise existing infrastructure including stormwater discharge points and other utility installations.

7.2.3 Proposed Further Assessment

Further assessment and mitigation measures relating to soil and water would be required for the Proposal. The EIS will include a soil and water assessment that addresses the following aspects:

- Assessment of existing water management infrastructure and its capacity to manage the proposed operational increase
- Assessment of the existing erosion and sediment controls on-site to manage any changes associated with the Proposal.

7.3 Hazards, Risks and Fire and Incident Management

7.3.1 Existing Environment

A Preliminary Hazards Assessment (PHA) was prepared for the Original Approval to identify hazards and risk associated with the Proposal site. The PHA indicated that there was no significant offsite impact from the use of dangerous goods on site due to the small quantities involved. The key potential risk is from the rupture of a 45kg LPG cylinder in the dangerous goods store. However, the Safe Work (SW) criteria for offsite fatality and property damage are considered to be satisfied due to the rarity of LPG cylinder ruptures. The development is not considered to be a hazardous industry as defined in SEPP 33.

Assessments undertaken for MOD 1 and MOD 2 found that these modifications would not alter the outcomes of the hazards and risk assessment as presented in the Original

Approval. Regarding MOD 3, changes were considered minor and included only small-scale operational changes to the Original Approval. Therefore, no further assessment was considered necessary as part of the MOD 3 approval.

Further to this, a Fire Order was placed on the Proposal site operations on 17 January 2018. Consequently, a number of works on site have been undertaken as part of MOD 3 to comply with this Fire Order.

The Proposal would increase the operational frequency at the existing RRF. However, no additional operational activities to those identified in the Original Approval would be required as part of the Proposal. Therefore, the current fire protection equipment at the existing RRF is considered suitable for the Proposal and no alterations to this equipment are considered necessary to comply with the required fire safety measures.

7.3.2 Summary of Potential Environmental Impacts

The Proposal would have a minimal impact upon the overall operations onsite. As such, the Proposal is not likely to change the management of hazards and risk as presented in the Original Approval.

Hazards associated with operation of the Proposal including potential incidents, will be managed as part of an approved Operational Environmental Management Plan (OEMP).

As noted in Section 1.2.1, upgraded fire infrastructure has been installed to assist the Proposal site in meeting the requirements of the Fire Order. The upgraded infrastructure includes the provision of pipes, tanks, pumps, hydrants and water cannons in accordance with the fire design specifications. Overall, there has been a considerable amount of fire protection equipment installed across the Proposal site to manage and reduce the potential for risk of fire during existing operations. Therefore, the existing fire infrastructure on site can accommodate the operational increase of the Proposal.

7.3.3 Proposed Further Assessment

An updated Preliminary Hazard Analysis (PHA) would be undertaken to identify whether it is necessary to implement changes to the types, quantities, storage locations and storage conditions of any dangerous goods proposed to be managed on the Proposal site. The updated assessment would also confirm the proposed frequency of transport movements relating to dangerous goods. Where any exceedances to thresholds are identified, the Proposal would be supported by an analysis to determine the risks associated with the Proposal.

In addition to dangerous goods, hazards and risks associated with the operation of the Proposal will also be assessed, including the identification of management measures to be implemented.

The suitability of the existing fire infrastructure on site to accommodate the Proposal would be confirmed as part of the EIS. The assessment would consider the Fire and Rescue NSW guideline ‘Fire safety in waste facilities’.

8. CONCLUSION

The Applicant is seeking approval to increase the throughput limit of the existing RRF from 350,000 to 600,000 tpa. The increase in throughput would allow the Applicant to process up to 600,000 tpa of metal scrap that would otherwise be sent to landfill.

The key objectives of the Proposal include the following:

- To increase the volume of scrap metal recycled at the RRF utilising existing approved infrastructure
- To meet higher recycling standards prescribed by China's National Sword Policy
- To optimise the efficiency of site processes, including vehicle movements and stacking locations
- To improve environmental performance of the Proposal site.

Relevant waste policy has been considered to ensure the objectives of the Proposal align to the strategic vision for waste and recycling within NSW and Australia.

The Proposal would be considered SSD under Clause 23 (waste and resource management facilities) of Schedule 1 of the State and Regional SEPP and therefore requires the preparation of an EIS and consent from the Minister for Planning and Public Spaces. Approval for the Proposal is sought as SSD under Part 4, Division 4.7 of the EP&A Act.

The potential environmental impacts of the Proposal have been identified as part of this report. This report concludes that the existing operational practices are suitable to accommodate the Proposal and therefore that minimal potential environmental impacts have been identified.

The key environmental issues identified for the Proposal include:

- Traffic, Access and Parking
- Air Quality and Odour
- Noise and Vibration.

Other environmental issues include:

- Waste Management
- Stormwater, Soil and Water
- Hazards, Risks and Fire and Incident Management.

The EIS for the Proposal would include the following in accordance with Schedule 1 of the EP&A Regs:

- A detailed description of the Proposal including its components, operational activities and potential staging
- A comprehensive assessment of the potential impacts on the key issues including a description of the existing environment, assessment of potential direct and indirect impacts
- Description of measures to be implemented to avoid, minimise, manage, mitigate, offset and/or monitor the potential impacts
- Identify and address issues raised by stakeholders.

SEARs are therefore requested to enable assessment of the Proposal under Part 4, Division 4.7 of the EP&A Act.

9. REFERENCES

Australian Government, Department of Environment and Energy (2019), *Protected Matters Search Tool*. Accessed 11 November 2019 from: http://www.environment.gov.au/epbc/pmst/

Blue Environment for the Australian Government (2019), *Data on exports of Australian wastes*

NSW Environment Protection Authority (EPA) (2014), *NSW Waste Avoidance and Resource Recovery Strategy 2014-21*, NSW EPA, Goulburn Street, NSW

NSW Environment Protection Authority (EPA) (2015), *State of the Environment 2015*, NSW EPA, Goulburn Street, NSW

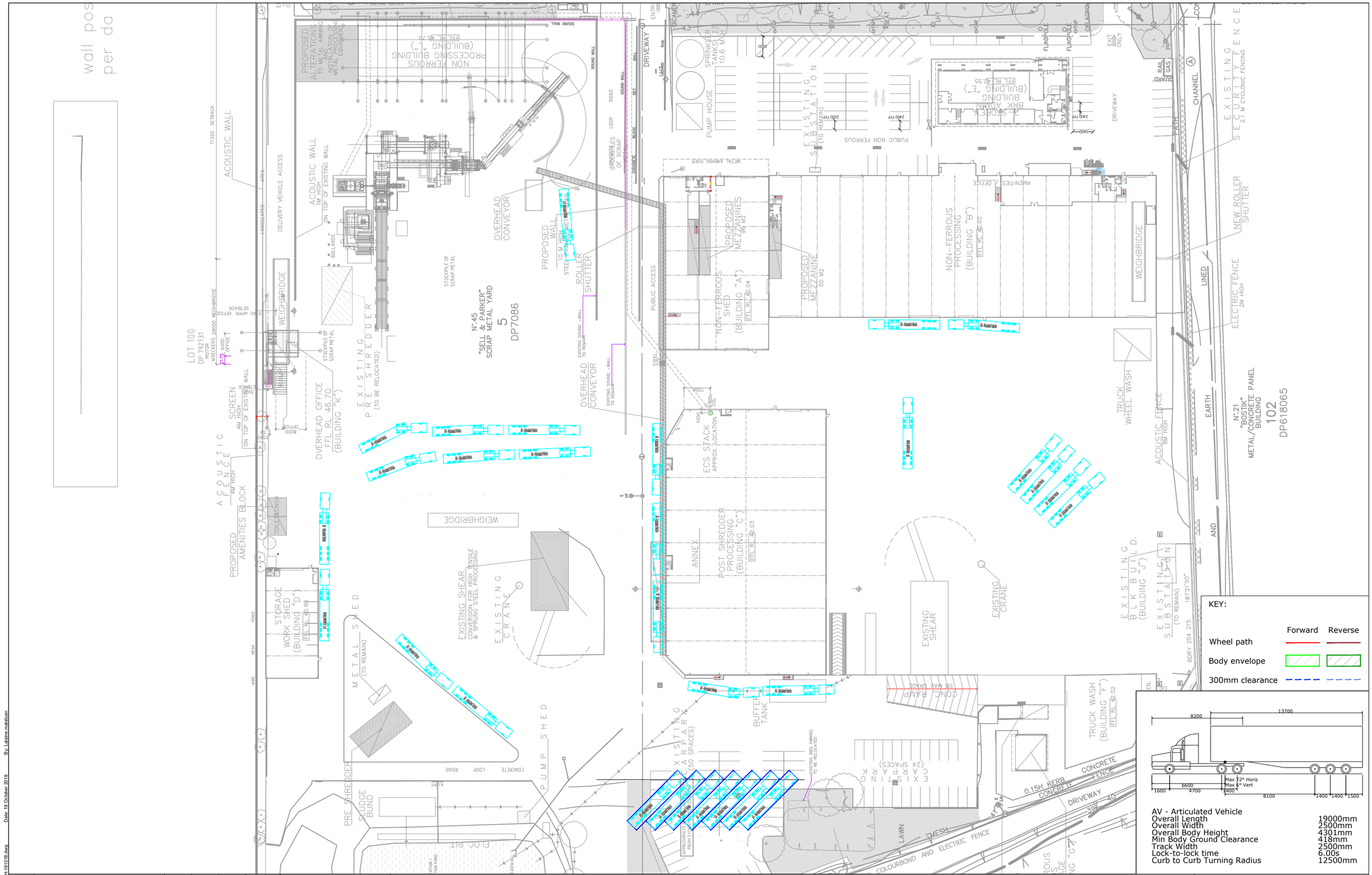
NSW Environment Protection Authority (EPA) (2015), *Waste Less Recycle More initiative: improved Systems for Household Problem Wastes – Community Recycling Centre. Round 3 Guidelines for Applicants*, NSW Government

NSW Environment Protection Authority (EPA) (2017), *Reforms to the Construction Waste Recycling Sector – Explanatory Paper,* NSW EPA, Goulburn Street, NSW

NSW Environment Protection Authority (EPA) (2019), *NSW Circular Economy Policy Statement: Too Good To Waste,* NSW Government

Recycling Today (2018), *State of scrap trade*. October 3, 2018. Retrieved from: https://www.recyclingtoday.com/article/state-of-scrap-trade/

APPENDIX A PRELIMINARY SWEPT PATHS



REV.	DESCRIPTION	DRAWN	CHECK	APP'D	DATE
A	ISSUE FOR DISCUSSION	LM	SB	WJ	18/10/19

ttpp transport planning

PROJECT

METAL RECOVERY FACILITY, KINGS PARK

TITLE

STACKING PLAN

DWG No. 19237CAD003 FIGURE 1

DATE STAMP 18 OCTOBER 2019

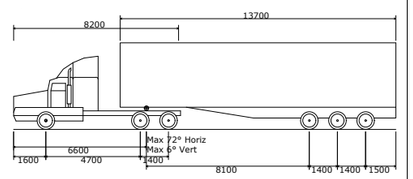
PROJECT No.	SCALE	REV.
19237	1:900 @A3	A

Filename: 19237CAD003-SWEPT PATH-191018.dwg Date: 18 October 2019 By: Lalaine malakian

wall pos
per da

KEY:

	Forward	Reverse
Wheel path		
Body envelope		
300mm clearance		



AV - Articulated Vehicle

Overall Length	19000mm
Overall Width	2500mm
Overall Body Height	4301mm
Min Body Ground Clearance	418mm
Track Width	2500mm
Lock-to-lock time	6.00s
Curb to Curb Turning Radius	12500mm

REV.	DESCRIPTION	DRAWN	CHECK	APP'D	DATE
A	ISSUE FOR DISCUSSION	LM	SB	WJ	18/10/19

ttpp transport planning

PROJECT

METAL RECOVERY FACILITY, KINGS PARK

TITLE

SWEPT PATH ANALYSIS
19m ARTICULATED VEHICLE - HEAVY / DANIELLI SHEAR

DWG No. 19237CAD003
FIGURE 2

DATE STAMP 18 OCTOBER 2019

PROJECT No.	SCALE	REV.
19237	1:900 @A3	A

Filename: 19237CAD003-SWEPT PATH-191018.dwg Date: 18 October 2019 By: Lalaine.makalusan

wall pos
per da

KEY:

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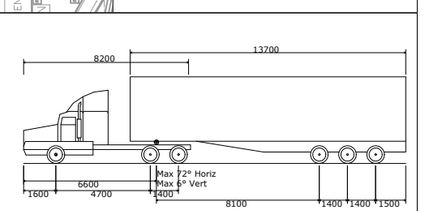
Wheel path		
Body envelope		
300mm clearance		



AV - Articulated Vehicle

Overall Length	19000mm
Overall Width	2500mm
Overall Body Height	4301mm
Min Body Ground Clearance	418mm
Track Width	2500mm
Lock-to-lock time	6.00s
Curb to Curb Turning Radius	12500mm

REV.	DESCRIPTION	DRAWN	CHECK	APP'D	DATE
A	ISSUE FOR DISCUSSION	LM	SB	WJ	18/10/19

ttpp transport planning

PROJECT

METAL RECOVERY FACILITY, KINGS PARK

TITLE

SWEPT PATH ANALYSIS
19m ARTICULATED VEHICLE - NON-FERROUS (REAR ACCESS)

DWG No. 19237CAD003
FIGURE 3

DATE STAMP 18 OCTOBER 2019

PROJECT No.	SCALE	REV.
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Filename: 19237CAD003-SWEPT PATH-191018.dwg Date: 18 October 2019 By: Lalaine malahuan

wall pos
per da

KEY:

	Forward	Reverse
Wheel path		
Body envelope		
300mm clearance		

AV - Articulated Vehicle

Overall Length	19000mm
Overall Width	2500mm
Overall Body Height	4301mm
Min Body Ground Clearance	418mm
Track Width	2500mm
Lock-to-lock time	6.00s
Curb to Curb Turning Radius	12500mm

REV.	DESCRIPTION	DRAWN	CHECK	APP'D	DATE
A	ISSUE FOR DISCUSSION	LM	SB	WJ	18/10/19

ttpp transport planning

PROJECT

METAL RECOVERY FACILITY, KINGS PARK

TITLE

SWEPT PATH ANALYSIS
19m ARTICULATED VEHICLE - HEAVY / DANIELLI SHEAR

DWG No. 19237CAD003 FIGURE 4

DATE STAMP 18 OCTOBER 2019

PROJECT No.	SCALE	REV.
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Filename: 19237CAD003-SWEPT PATH-191018.dwg Date: 18 October 2019 By: Lalaine.malakian

wall pos
per da

KEY:

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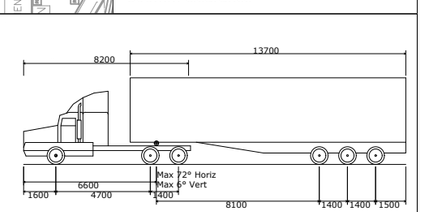
Wheel path		
Body envelope		
300mm clearance		



AV - Articulated Vehicle

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Overall Width	2500mm
Overall Body Height	4301mm
Min Body Ground Clearance	418mm
Track Width	2500mm
Lock-to-lock time	6.00s
Curb to Curb Turning Radius	12500mm

REV.	DESCRIPTION	DRAWN	CHECK	APP'D	DATE
A	ISSUE FOR DISCUSSION	LM	SB	WJ	18/10/19

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PROJECT

METAL RECOVERY FACILITY, KINGS PARK

TITLE

SWEPT PATH ANALYSIS
19m ARTICULATED VEHICLE - OXY-CUTTER

DWG No. 19237CAD003
FIGURE 5

DATE STAMP 18 OCTOBER 2019

PROJECT No.	SCALE	REV.
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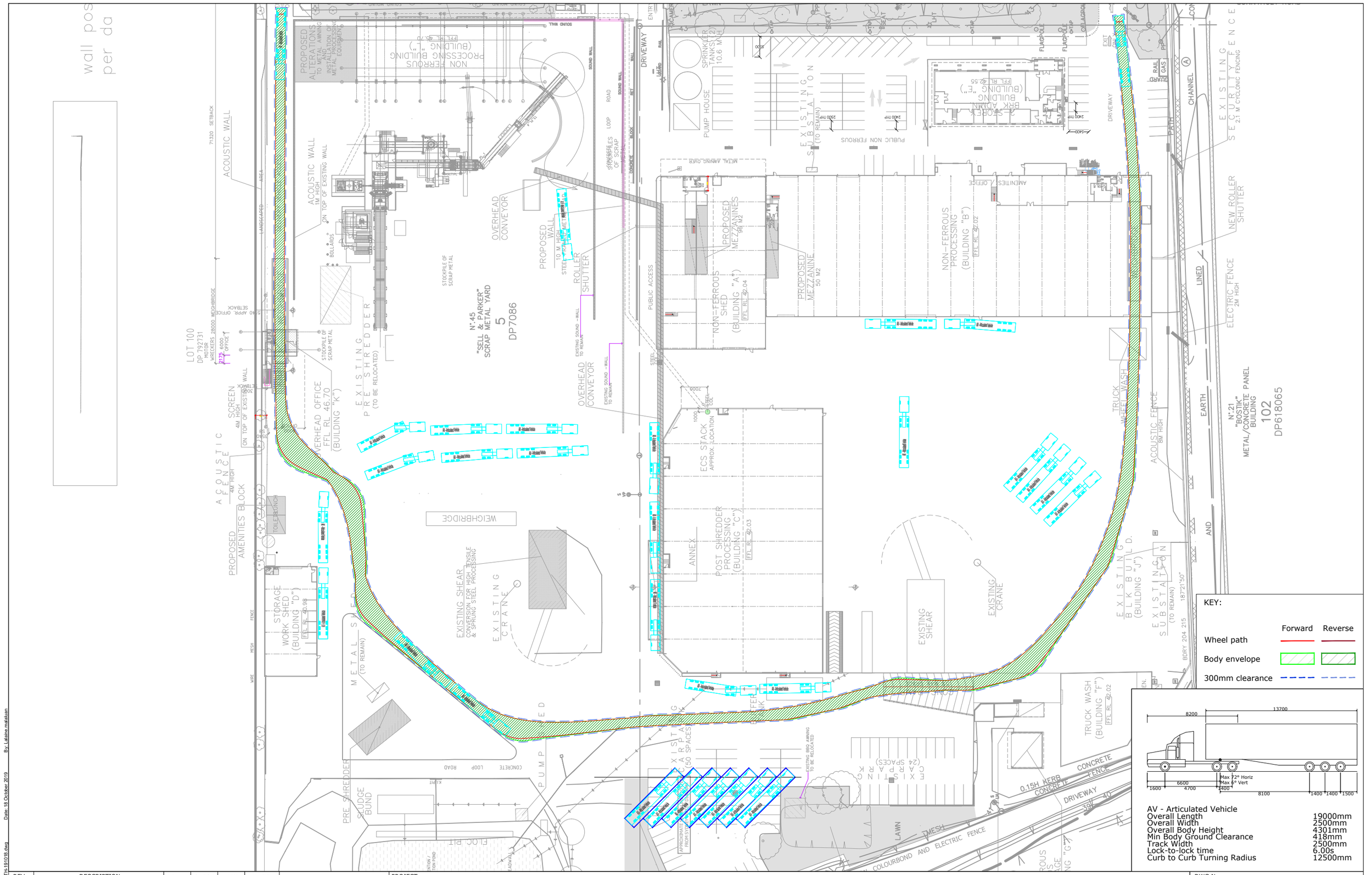
Filename: 19237CAD003-SWEPT PATH-191018.dwg Date: 18 October 2019 By: Lalaine malakian



REV.	DESCRIPTION	DRAWN	CHECK	APP'D	DATE
A	ISSUE FOR DISCUSSION	LM	SB	WJ	18/10/19

ttpp transport planning

PROJECT

METAL RECOVERY FACILITY, KINGS PARK

TITLE

SWEPT PATH ANALYSIS
19m ARTICULATED VEHICLE - PRE-SHREDDER

DWG No. 19237CAD003 FIGURE 6

DATE STAMP 18 OCTOBER 2019

PROJECT No.	SCALE	REV.
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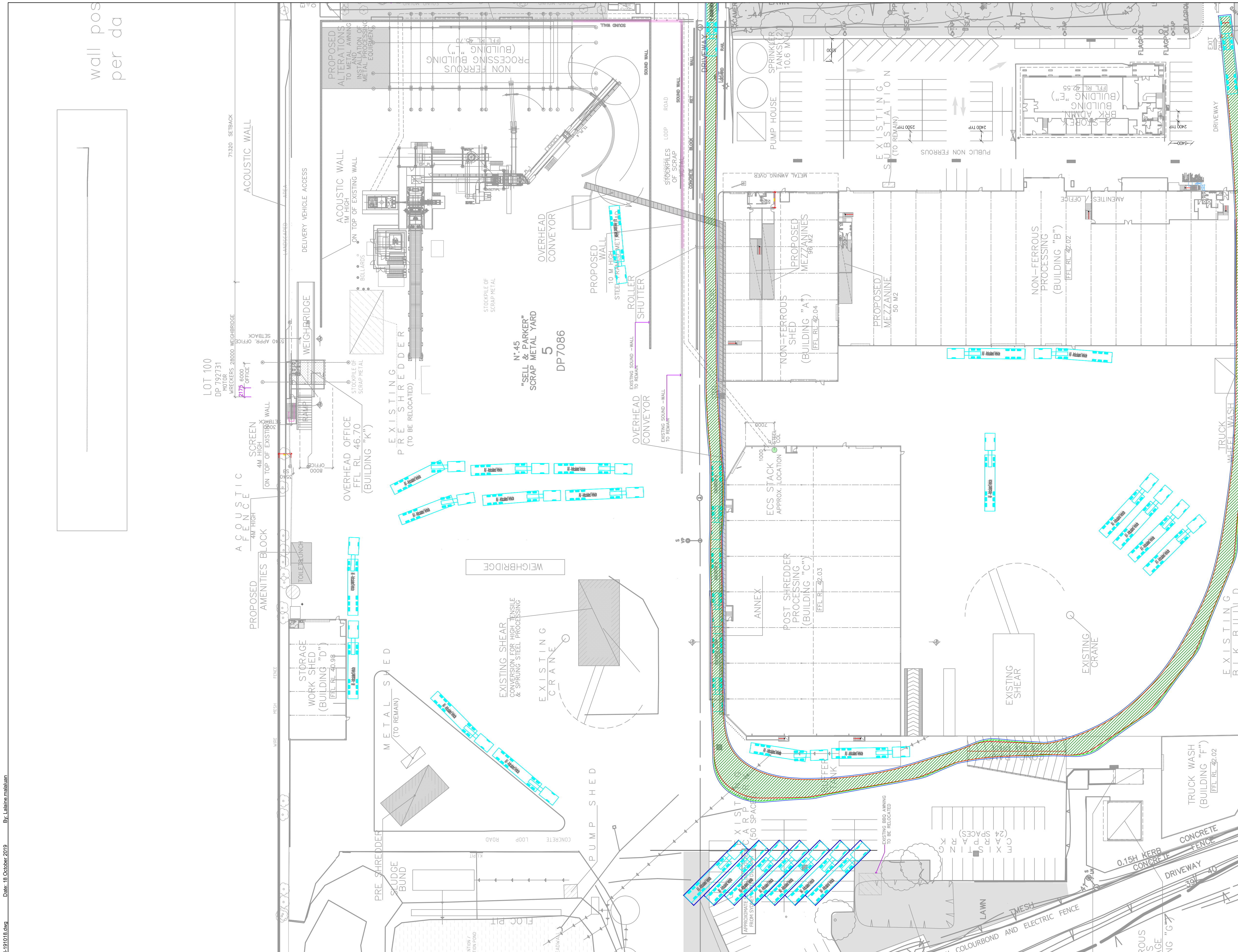
Filename: 19237CAD003-SWEPT PATH-191018.dwg Date: 18 October 2019 By: Lafaine makaluan



KEY:

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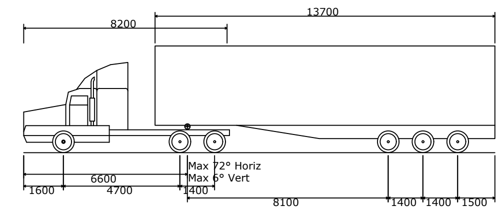
Wheel path		
Body envelope		
300mm clearance		



AV - Articulated Vehicle	
Overall Length	19000mm
Overall Width	2500mm
Overall Body Height	4301mm
Min Body Ground Clearance	418mm
Track Width	2500mm
Lock-to-lock time	6.00s
Curb to Curb Turning Radius	12500mm

REV.	DESCRIPTION	DRAWN	CHECK	APP'D	DATE
A	ISSUE FOR DISCUSSION	LM	SB	WJ	18/10/19

ttpp transport planning

PROJECT
METAL RECOVERY FACILITY, KINGS PARK

TITLE
SWEPT PATH ANALYSIS
19m ARTICULATED VEHICLE - FLOC + SHRED

DWG No. 19237CAD003
FIGURE 7

DATE STAMP 18 OCTOBER 2019

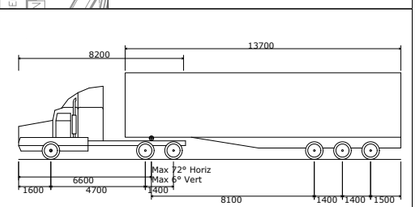
PROJECT No. 19237 | SCALE 1:900 @A3 | REV. A

Filename: 19237CAD003-SWEPT PATH-191018.dwg Date: 18 October 2019 By: Lalaine.malaluan

wall pos
per da

KEY:

	Forward	Reverse
Wheel path		
Body envelope		
300mm clearance		



AV - Articulated Vehicle

Overall Length	19000mm
Overall Width	2500mm
Overall Body Height	4301mm
Min Body Ground Clearance	418mm
Track Width	2500mm
Lock-to-lock time	6.00s
Curb to Curb Turning Radius	12500mm

REV.	DESCRIPTION	DRAWN	CHECK	APP'D	DATE
A	ISSUE FOR DISCUSSION	LM	SB	WJ	18/10/19

ttpp transport planning

PROJECT

METAL RECOVERY FACILITY, KINGS PARK

TITLE

SWEPT PATH ANALYSIS
19m ARTICULATED VEHICLE - SHRED

DWG No. 19237CAD003
FIGURE 8

DATE STAMP 18 OCTOBER 2019

PROJECT No.	SCALE	REV.
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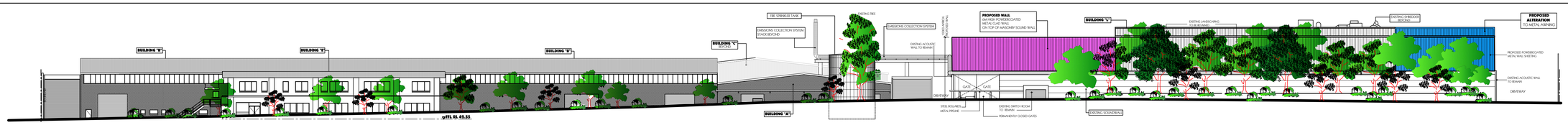
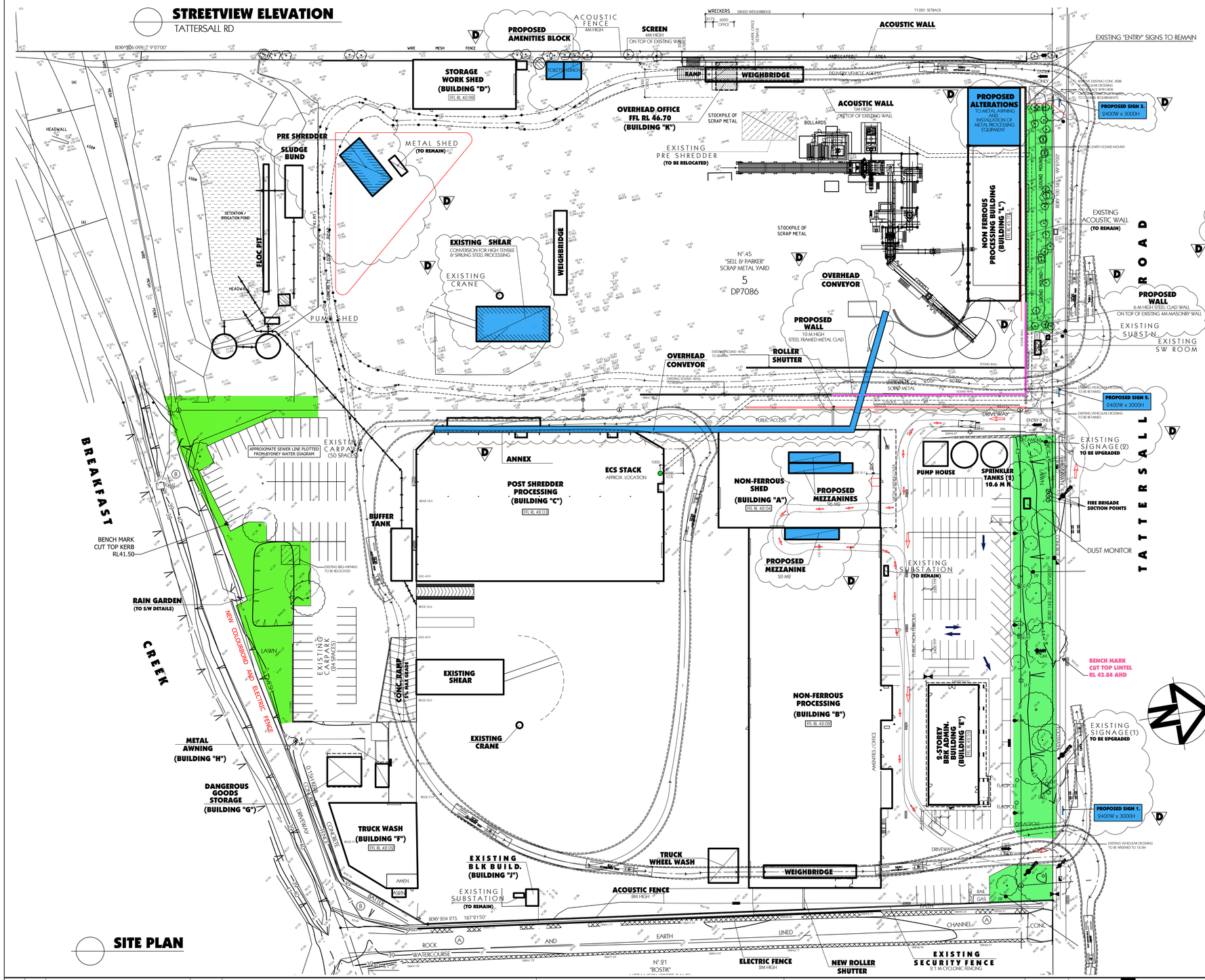
Filename: 19237CAD003-SWEPT PATH-191018.dwg Date: 18 October 2019 By: Lafaine makaluan

APPENDIX B APPROVED SITE LAYOUT



STREETVIEW ELEVATION

TATTERSALL RD



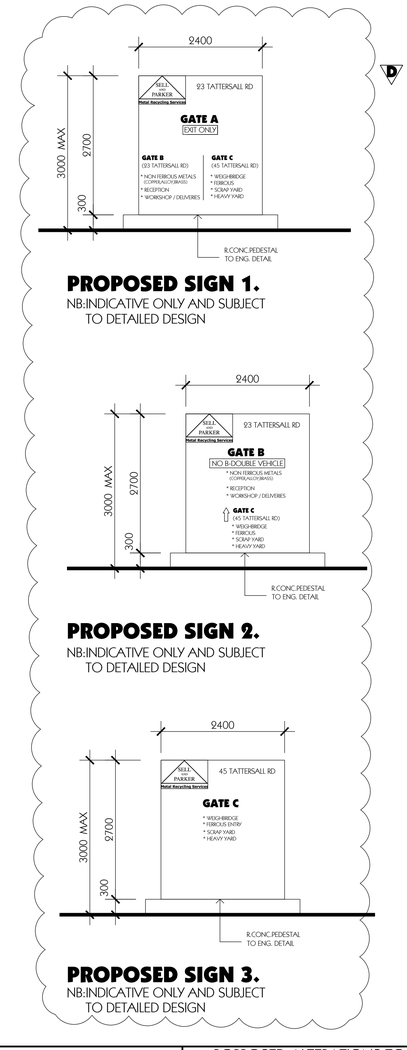
SITE PLAN

LEGEND

- EXISTING STRUCTURE TO REMAIN
- EXISTING STRUCTURE TO BE REMOVED
- PROPOSED ALTERATIONS & ADDITIONS
- EXISTING STRUCTURE TO BE FOR REUSE OR TO BE RELOCATED
- PROPOSED WALL EXTENSION
- LANDSCAPED AREAS TO REMAIN

DEVELOPMENT DATA

SITE AREA	59 475 M2 approx.		
	FLOOR AREAS		
	W'HOUSE / EQUIPMENT STORE	OFFICE /AMEN	AWNING
BUILD "A"	1278 M2	194 M2	
BUILD "B"	3162 M2	488 M2	
BUILD "C"	2981 M2	-------	106 M2
BUILD "D"	415 M2	-------	
BUILD "E"	984 M2	-------	
BUILD "F"	494 M2	-------	
BUILD "G"	81 M2	-------	
BUILD "H"	25 M2	-------	
BUILD "J"	17 M2	-------	
BUILD "K"	47 M2	-------	
BUILD "L"	593 M2	-------	
TOTAL	10 077 M2	462 M2	106 M2



PROPOSED SIGN 1.

NB:INDICATIVE ONLY AND SUBJECT TO DETAILED DESIGN

PROPOSED SIGN 2.

NB:INDICATIVE ONLY AND SUBJECT TO DETAILED DESIGN

PROPOSED SIGN 3.

NB:INDICATIVE ONLY AND SUBJECT TO DETAILED DESIGN

Issue	By	Description	Date:
A	CZ	SECTION 96	01/06/18
B	CZ	MODIFICATION APPLICATION 4.55	03/12/18
C	CZ	MODIFICATION APPLICATION 4.55	21/01/19
D	CZ	MODIFICATION APPLICATION 4.55	29/01/19

GENERAL NOTES

1) All dimensions and floor areas are to be verified by the Builder prior to the commencement of any building work. Any discrepancies are to be brought to the attention of the designer.
2) Levels shown are approximate unless accompanied by reduced levels.
3) Figured dimensions must be taken in preference to scaling.
4) All boundary clearances must be verified by the surveyor prior to the commencement of any building works.
5) Where engineering drawings are required such must take preference to this drawing.
6) Stormwater to be discharged to Councils' requirements and AS 3500.3–1990.
7) All services to be located and verified by the Builder with relevant authorities before any building work commences.

Consultants

Date	NOVEMBER 2017
Scale	1:500 UNO
Drawn	J.LARIA
Checked	C.ZAPPIA
Certified	

ALGORRY ZAPPIA & ASSOCIATES PTY. LTD.
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Consulting Civil & Structural Engineers & Building Designers
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E-mail: admin@algorryzappia.com.au
Web: www.algorryzappia.com.au

Project: PORPOSED ALTERATIONS TO EXISTING RECYCLING CENTRE
LOT 2 DP550522 & LOT 5 DP7086 , No 23 & 45 TATTERSALL RD, KINGS PARK

Client: SELL & PARKER METAL

Project No.: P4144

Title: DEVELOPMENT APPLICATION
SITE PLAN

Activity Type: DA

Job No.: 2189-17

Sheet No.: A101

Issue: D

B1 SHEET

APPENDIX C PRELIMINARY SUMMARY OF ISSUES

A preliminary summary of issues is presented in Table 10 to assist guiding the SEARs and provide a list of anticipated requirements for the Proposal.

Table 10 Preliminary summary of issues

Key Issues	Anticipated Requirements
Transport, Access and Parking	The EIS will be accompanied by a comprehensive Transport Impact Assessment addressing the following specific matters: • The current and future capability of local and regional road infrastructure • The current and future capacity of the Proposal site to accommodate parking • The type and frequency of heavy vehicles proposed to utilise the Proposal site • Modelling of key intersections and details of heavy vehicle routes • Vehicle turnaround times including consideration of all vehicle movements (e.g. tipping, stacking and manoeuvring, collection, weigh in and weigh out) • The suitability of the site layout to accommodate the predicted heavy vehicle movements to/from the site • The development of a Traffic Control Plan (TPC) for the Proposal site • Details of measures to prevent queuing of vehicles on Tattersall Road • Details of the internal road layout network, access and egress, pedestrian movements, and parking in accordance with Australian Standards.
Air Quality and Odour	An air quality and odour assessment will be conducted as part of the EIS to evaluate the impact of key pollutants as a result of increasing the operational capacity at the Proposal site. The updated assessment would consider the cumulative particulate matter impacts and identify any additional management measures required.
Noise and Vibration	The EIS will be accompanied by a noise and vibration assessment to determine the potential impacts of the operations of the Proposal at surrounding receivers, including: • Establish existing ambient and background noise levels at the potentially most affected off-site receiver locations • Identify nearby sensitive receptors, land use and terrain • Identify sound power levels for each piece of equipment or process • Assess operational noise impacts in accordance with the *Noise Policy for Industry 2017* • Assess traffic noise consistent with EPA's *Road Noise Policy* • Identify feasible and reasonable noise mitigation measures to address noise exceedances at sensitive receivers.

Key Issues	Anticipated Requirements
	The assessment would include recommendations to mitigate any noise and vibration impacts of the Proposal on surrounding sensitive receivers.
Waste Management	A waste management assessment would be undertaken as part of the EIS to determine the potential impacts of the Proposal. The assessment would: • Identify waste streams generated during operation of the Proposal • Assess waste management impacts associated with the operations of the Proposal • Identify management and mitigation measures for resource use and waste across the Proposal including disposal sites and transport impacts • Identify the measures that would be implemented to ensure that the Proposal is consistent with the regulatory obligations under the *Protection of the Environment Operations Act 1997* and *NSW Waste Avoidance and Resource Recovery Strategy 2007* • Include the preparation of an updated Waste Monitoring Management Plan that reflects the increase of waste processing considered for the Proposal.
Stormwater, Soil and Water	The EIS will include a soil and water assessment that addresses the following aspects: • Assessment of existing water management infrastructure and its capacity to manage the proposed operational increase • Assessment of the existing erosion and sediment controls on-site to manage any changes associated with the Proposal.
Hazards and Risks	An updated Preliminary Hazard Analysis (PHA) would be undertaken to identify potential changes to the types, quantities, storage locations and storage conditions of any dangerous goods proposed to be managed on the Proposal site. The updated assessment would also confirm the proposed frequency of transport movements relating to dangerous goods. Where any exceedances to thresholds are identified, the Proposal would be supported by an analysis to determine the risks associated with the Proposal. In addition to dangerous goods, hazards and risks associated with the operation of the Proposal will also be assessed, including the identification of management measures to be implemented.
Fire and Incident Management	The suitability of the existing fire infrastructure on site to accommodate the Proposal would be confirmed as part of the EIS. The assessment would consider the Fire and Rescue NSW guideline 'Fire safety in waste facilities'.
Consultation	Consultation with government agencies, service providers, local community and affected landowners will be undertaken during the preparation of the EIS. The Applicant is committed to consult with: • Department of Planning, Industry and Environment • Blacktown City Council

Key Issues	Anticipated Requirements
	• Environment Protection Authority • Roads and Maritime Services • Sydney Water • Fire and Rescue NSW • Nearby landowners and occupiers that may be affected by the Proposal.

ARCADIS Design & Consultancy for natural and built assets