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2 December 2015

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

Re: Application for Secretary's Environmental Assessment Requirements for a proposed Recycling Facility, Smeaton Grange, NSW

Dear Sir/Madam,

1 Introduction

This letter requests Secretary's Environmental Assessment Requirements (SEARs) for a proposed recycling facility (the development) in Smeaton Grange, NSW (Camden Council local government area). It has been prepared by EMM Consulting Pty Limited (EMM) on behalf of our client, Benedict Recycling Pty Ltd (Benedict Recycling). As described below, the development would be state significant development (SSD).

2 Site and surrounds

2.1 The site

The site is located at 52 Anderson Road, Smeaton Grange, NSW, and is legally described as Lot 319 in DP 1117230. It is within the Smeaton Grange industrial precinct and covers 6,862 m² (Figure 1). The site is flat (approximately 90 m Australian Height Datum (AHD)) and is largely covered by grass planted to stabilise the site (Photograph 1). The site has been cleared and slightly filled and shaped with clay by the developer, Investa Property Group. There are trees just outside of the north-eastern boundary (Photograph 2).

The site is zoned IN1 General Industrial pursuant to the Camden Local Environmental Plan 2010 (Camden LEP).

2.2 The surrounds

The site is at the end of a cul-de-sac (Anderson Street) which provides the only access to the site. There is an existing large industrial warehouse on the adjacent site to the south-west (Photograph 3) and a light industrial building is being constructed to the north of the site. The nearest residences are approximately 120 m to the south-east on Linton Road and Chapman Circuit (Figure 1).



Site Location
 Smeaton Grange
 Benedict Industries
 Figure 1



Photograph 1 General view across the site



Photograph 2 Trees outside of the north-eastern boundary of the site



Photograph 3 Existing industrial building on adjoining site

All land surrounding the site within the Smeaton Grange industrial precinct is zoned IN1 General Industrial with land further to the south-east zoned R2 Residential under the Camden LEP.

3 Proposed Benedict Recycling Facility

Benedict Recycling proposes to develop a recycling facility on the site, referred to as the 'Benedict Recycling Facility, Smeaton Grange' or the 'Recycling Facility'.

The Recycling Facility would import inert general solid waste (non-putrescible), such as construction and demolition wastes, and selected commercial and industrial wastes, for processing (eg screening and sorting) to produce saleable recycled materials. The recycled materials produced would include soils, metals and dry paper/cardboard. These products would meet recycled material specifications while recovering a range of materials that would otherwise be disposed to landfill.

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

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

3.1 Site components

The Recycling Facility would include the following components:

- a waste transfer holding shed which would contain the majority of waste processing activities and some stockpiles;
- a segregated heavy waste (timber, brick/concrete and metal) and stockpiling area in bins also along the southern boundary;
- a yard, storage and parking area;
- a weighbridge area with three weighbridges, wheel-washes for the two outbound traffic lanes, demountable offices and amenities;
- a sprinkling site irrigation system to minimise airborne dust; and
- general use areas, including internal roads.

The entire site would be sealed (asphalt or concrete) with a perimeter curb.

3.2 Site operations

3.2.1 Waste receipt

Approval would be sought for the Recycling Facility to accept a total of 140,000 tonnes per year of the following wastes:

- unsegregated and segregated building and demolition waste — soils, bricks, concrete, paper/cardboard, plastics, rubber, plasterboard, ceramics, glass, metal and timber, and the like;
- vegetation and uncontaminated soils;
- tiles, asphalt, suitable slags and concrete batching waste;
- excavated natural materials including virgin natural excavated material (VNEM) such as sand and sandstone which are generated during bulk earthworks and road and infrastructure repair; and
- rail ballast and spoils.

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

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

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

About 28,500 waste deliveries are expected annually when the facility is operating at maximum capacity. This would be a daily average of about 68 deliveries by light vehicles (ie less than three tonnes) and about 35 deliveries by heavy vehicles (ie 3 tonnes to about 42 tonnes). However, variations around these averages are expected on any given day. While light vehicle are expected to make about 66% of deliveries, they would only deliver about 18% of the total tonnage received at the Recycling Facility.

The site is accessible from Anderson Road via Camden Valley Way and also from Anderson Street via Anzac Avenue and Smeaton Grange Road. Camden Valley Way and Smeaton Grange Road are both major heavy vehicle routes. Anderson Street and Anzac Avenue are both within the IN1 General Industrial zone and are suitable for heavy vehicles.

Waste would be inspected prior to being accepted on site and any loads suspected to contain contaminants would be rejected.

Wastes would generally be stored undercover in the waste transfer holding shed prior to processing. However, some segregated heavy materials (eg concrete, timber and metal) would be stored on the hardstand.

3.2.2 Processing and dispatch

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

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

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

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

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

Dispatch of products and rejects would require about 17 truck (generally truck and dog) trips daily when the Recycling Facility is operating at maximum capacity. Vehicle movements, parking , and site storage

There would be an average of about 276 vehicle movements (ie 138 trips) daily, comprised of 167 light vehicle and 109 heavy vehicle movements for all site activities (waste receipt, products/rejects dispatch, employees and maintenance).

The Recycling Facility would include parking for trucks, and employee and visitor light vehicles. Customer skip bins and skip-bin trucks would also be stored at the facility.

3.2.3 Operating hours and workforce

The Recycling Facility would generally accept deliveries (from businesses and the public) and dispatch materials between 6 am and 10 pm Monday to Friday and between 6 am and 5 pm on Saturday. It

would also accept deliveries from 8 am to 4 pm on Sunday, providing an additional day on which the public could deliver recyclable waste to the facility. On occasions, the facility would accept waste deliveries 24 hours per day to allow infrastructure projects operating on a similar basis (eg rail corridor works) and adjoining businesses, to deliver waste as it is generated.

Waste processing would only occur at the site from 7 am to 6 pm Monday to Saturday. There would be no processing on Sundays or public holidays.

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

The Recycling Facility is expected to be operated by about 15 Benedict Recycling employees.

3.3 Construction

The site surface would be sealed with concrete or asphalt and water management measures installed. These would include the perimeter kerb and a water collection pit.

Project construction would then require:

- installing gates and fencing;
- erecting the waste transfer holding shed;
- constructing waste and product bays
- installing weighbridges and demountable offices/amenities;
- marking traffic circulation and parking bays; and
- landscaping at the entrance.

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

Construction would take 10 to 12 weeks.

An initial estimate indicates that about \$1.3 million site improvements would be required and about \$3 million of mobile plant would be used during operations. The construction timeframe would be approximately two months.

4 Preliminary environmental review

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

Table 1 Preliminary environmental review

Aspect	Preliminary environmental review
Soils and contamination	<p>The site was previously rural land and is therefore unlikely to include anything more than localised contamination from agricultural activities.</p> <p>The EIS would include a preliminary contamination investigation to identify any past or present potentially contaminating activities, to provide a preliminary assessment of any site contamination and, if required, to provide a basis for a more detailed investigation.</p> <p>No significant ground excavation is anticipated and the site would be fully sealed with no exposed soils. Therefore, little or no sediment generation is anticipated.</p> <p>It is unsure at this stage whether the site is mapped as containing Acid Sulfate Soils. This would be confirmed in the EIS and, if identified, appropriate assessment and management would be undertaken.</p>
Surface water	<p>The site would be fully sealed (concrete or asphalt) with a surrounding curb.</p> <p>Waste or products that could generate leachate would generally be handled, processed and stored undercover in the waste transfer holding shed.</p> <p>Surface water controls at the site would be designed to prevent uncontrolled release of water from the site. These controls will be described in the EIS.</p> <p>The EIS would also describe the efficient use of mains and rain water and arrangements for the discharge of any excess water.</p>
Groundwater	<p>The site has already been levelled and therefore no significant ground excavation is anticipated. Minor ground disturbance is unlikely to intersect any groundwater but this will be assessed in the EIS.</p>
Ecology	<p>The site has been previously cleared, filled and levelled and contains only planted grasses for stabilisation. The trees along the north-eastern boundary are outside of the site would not be affected by the proposal.</p>
Roads and traffic	<p>The site is accessible from Anderson Road via Camden Valley Way and also from Anderson Street via Anzac Avenue and Smeaton Grange Road. Both access routes are suitable for heavy vehicles and the main intersections at Camden Valley Way and Smeaton Grange Road have been recently upgraded. A full traffic impact assessment will be undertaken as part of the EIS.</p>
Air quality	<p>Some of the proposed activities have the potential to produce airborne dust. However, dust emission levels are generally expected to be low as the site will be sealed and an irrigation system installed.</p> <p>Dust levels at sensitive receptors will be assessed in the EIS.</p> <p>Given that no putrescibles would be accepted at the Recycling Facility, significant odours are not expected to be generated at the site. Given the setback of the closest residences potential dust and odour impacts are not anticipated to be at an unacceptable level.</p>
Noise	<p>The site is within an existing industrial area with setback potential residential noise receivers.</p> <p>Noise levels at sensitive receptors will be assessed in the EIS.</p>
Visual	<p>The site is flat and at a similar level to the surrounding sites.</p> <p>There are trees along a drainage line outside of the site boundary that screen views to the site from the north, including from Ashford Circuit. These trees would also screen the majority of views from Chapman Circuit, to the east. Views from Chapman Circuit are also minimised by a low rise between the site and Chapman Circuit.</p> <p>There are large warehouses on the southern, western and north-western sides of the site and another warehouse is being constructed on the lot adjacent to the site.</p> <p>As such, the site would be largely obscured from external viewpoints and would be in keeping with the industrial character and appearance of the area. Potential visual impacts will be assessed in the EIS.</p>
Aboriginal and historic heritage	<p>Given that the site has been cleared, it is unlikely that there would be any items of Aboriginal or historic heritage. A search of the relevant heritage registered will be undertaken and should any items be identified an appropriate level of assessment will be described in the EIS.</p>
Bushfire	<p>The site is not on bushfire prone land.</p>
Hazards	<p>An above-ground diesel tank (approximately 30,000 L capacity) would be installed within a bund.</p>

Table 1 Preliminary environmental review

Aspect	Preliminary environmental review
	<p>Small amounts of other hazardous materials (eg acetylene for welding) would also be stored on site. Hazardous waste would not be accepted by the Recycling Facility.</p> <p>The EIS will determine if the Recycling Facility would be a potentially hazardous or offensive development according to SEPP 33 – Hazardous and Offensive Development.</p>
Waste	A waste management plan, including an incoming waste quality plan would be prepared prior to the start of Recycling Facility operations.

It is considered that it is appropriate to address the following environmental aspects in the EIS as described Table 4:

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

5 Planning controls

5.1 Legislative framework

A summary of legislation (including planning instruments) and polices relevant to the development proposal is provided in Table 5.

Table 5 Legislation relevant to the Recycling Facility

Legislation/instrument	Relevant section	Comment
POEO Act	Schedule 1	Proposed activities at the Recycling Facility are listed under Schedule 1 of the POEO Act as ‘Resource recovery’ activities. Accordingly, an Environment Protection Licence (EPL) would be required.
<i>Environmental Planning and Assessment Act 1979</i> (EP&A Act)	Section 89C	Section 89 of the EP&A Act identifies that a SEPP may declare any development to be SSD. Where a development is declared SSD the Minister is the consent authority.
State Environmental Planning Policy (SEPP) (State and	Schedule 1 State significant development—general	The Recycling Facility would be SSD pursuant to Schedule 1 of the State and Regional Development SEPP as it constitutes a

Table 5 **Legislation relevant to the Recycling Facility**

Legislation/instrument	Relevant section	Comment
Regional Development) 2011		Waste and Resource Management Facility, where development for the purpose of resource recovery or recycling facilities that handles more than 100,000 tonnes per year of waste.
SEPP (Infrastructure) 2007		Waste or resource management facilities may be developed with consent in an IN1 General Industrial zone (see below).
SEPP 33 Hazardous and Offensive Development		SEPP 33 applies to development of potentially hazardous industry. It requires the consent authority to consider whether an industrial development is a potentially hazardous industry or a potentially offensive industry. The EIS would consider if the Recycling Facility would be a potentially hazardous industry.
SEPP 55 Remediation of Land		No significant subsurface disturbance activities are proposed. If the preliminary hazard investigation determines that the site is contaminated an assessment of the appropriate level of action required to remediate the site would be undertaken in accordance with SEPP 55.
Camden LEP	2.1 Land use zones	The site is zoned IN1 General Industrial.
	Land Use Table	The Recycling Facility is permissible with consent in accordance with the IN1 zone and meets the objectives of the zone.
Camden Development Control Plan (DCP) 2011	D4 General Industrial Controls	The DCP includes detailed development control provisions for all development on industrial zoned land including land zoned IN1 General Industrial at Smeaton Grange.
	Built Form and Design	The DCP includes provisions for lot sizes (ie minimum 2,000 m ² , building materials (ie elevations and surfaces to be constructed predominantly in masonry, textured pre-cast concrete panels or colorbond metal cladding) and appearance (ie having regard to visual and functional opportunities of the locality). The Recycling Facility will be designed in accordance with the relevant provisions of the DCP.
	Stormwater	Industrial development in all areas except Smeaton Grange requires the use of on-site detention systems. Water quality strategies would be incorporated in the proposed Recycling Facility design to manage water generated from the site and to consider how any on-site water system would be available for use for non-potable uses. An appropriate on-site water detention system will be described in the EIS, which would include options for water re-use.
	Liquid and Solid Waste	The following controls apply to the discharge and disposal of all waste types for industrial developments: <ul style="list-style-type: none"> • no liquids (including water) discharged from the site shall contain pollutants above acceptable levels; • certain liquids (in addition to sewerage) may be discharged into the sewer provided a Trade Waste agreement is entered into with Sydney Water; and • waste storage facilities must be properly sited and constructed to avoid negative impacts to the soil and water resources in the area.

Table 5 **Legislation relevant to the Recycling Facility**

Legislation/instrument	Relevant section	Comment
		The disposal of all liquid and solid waste will be assessed in the EIS and an incoming waste quality plan would be prepared prior to the start of Recycling Facility operations.
	Noise and Vibration	A noise impact assessment will be prepared as part of the EIS to determine compliance with relevant state and local government noise criteria, including the DCP.
	Air Quality	The emission of air impurities would be controlled in accordance with the Clean Air (Plant & Equipment) Regulation. An air quality impact assessment will be prepared as part of the EIS to determine compliance with relevant state and local government noise criteria, including the DCP.

6 Project justification

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

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

The site is ideally located for the proposed Recycling Facility because:

- it is centrally located in western Sydney to service a number of major urban areas including, Campbelltown, Bankstown and Liverpool;
- it is readily accessible from major transport links including the Camden Bypass, Hume Highway, and the M5;
- the site is within an existing industrial area surrounded by other compatible developments and land uses;
- the site is adequately separated from sensitive receivers (ie residences) to enable potential adverse environmental impacts (ie air and noise) to be managed and/or mitigated; and
- the proposed activities are not expected to be visible from any publically accessible location.

7 Closing

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

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

Yours sincerely

A handwritten signature in blue ink, consisting of a large, stylized 'P' followed by a long, sweeping horizontal line that tapers to the right.

Philip Towler
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ptowler@emgamm.com