

Our Ref:CC160136

22 June 2017

Secretary
NSW Department of Planning & Environment
GPO Box 39
Sydney NSW 2000

Dear Sir/Madam,

**Re: State Significant Development – Request for Secretary's Environmental Assessment Requirements – Kings Park Waste Metal Recovery, Processing and Recycling Facility
57-69 Tattersall Road, Kings Park**

1 Introduction

This letter requests the Secretary's Environmental Assessment Requirements (SEARs) for a development application (DA) to operate a metal recovery and recycling facility at 57-69 Tattersall Road, Kings Park.

The site is owned by Auto-recyclers Pty Ltd and operated as Pick 'n' Pay Less Self Serve Auto Parts. A development consent (DA 15-291) for the existing car dismantling and recycling facility was issued by Blacktown City Council on 8th March 1996.

Auto Recyclers Pty Ltd have identified additional demand to recycle car bodies and other metal and the expansion of the existing auto recycling business is necessary to meet the identified market demand. The expansion will facilitate a far greater efficiency in the utilisation of equipment, enabling the operator to respond to market supply and demand volumes and safeguard the long term economic viability of the business.

The metal recycling and recovery facility will be state significant development (SSD) under Division 4.1 of Part 4 of the NSW Environmental Planning and Assessment Act 1979 (EP&A Act) to enable it to handle a volume of material greater than 100,00 tonnes per year.

It is proposed that a development application for a metal recovery and recycling facility with a processing capacity of 130,000 tonnes per year will be lodged under section 89E of the Environmental Planning and Assessment Act 1979 (EP&A Act). In accordance with Clause 3 of Schedule 2 of the Environmental Planning and Assessment Regulation 2000 (EPAR), this correspondence contains a review of the relevant environmental planning instruments and guidelines and provides a preliminary environmental assessment of the proposed development, for the purpose of obtaining the Secretary's Environmental Assessment Requirements (SEARs) for the project.

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2 Site and surrounds

The site is located at 57-69 Tattersall Road, Kings Park and is legally described as Lot 100 in DP 792731 (Figure 1). The lot has an irregular shape with a relatively narrow frontage to Tattersall Road. The total land area is approximately 6 ha and is shown in Figure 1 below.



Figure 1: Aerial Photo of Site

The site is located within the Blacktown local government area. The land is zoned IN1 General Industrial under Blacktown Local Environmental Plan 2015 (BLEP).

The surrounding area comprises a mix of industrial and warehouse development, with scattered vegetation, mostly along Breakfast Creek. The locality is shown in Figure 2 below. The site is bounded:

- To the north – Tattersalls Road and other industrial development;
- To the east – Other industrial development including a metal recycling yard directly adjoining the site (Sell and Parker);
- To the south – Breakfast Creek and industrial development beyond; and
- To the west – Industrial development, including warehouses.

The nearest residences are located to the east on the far side of Sunnyholt Road, approximately 550 m from the site (Figure 1). To the west the nearest residences are approximately 660 metres from the site, with the residential and industrial zones being separated by the Richmond railway line.

The site is generally flat but has a slight fall towards Breakfast Creek. It is largely devoid of vegetation except for some trees adjacent to the front car park and scattered along the property boundaries. There is no significant vegetation on the site.

Access to the site is off Tattersall Road, which connects to Sunnyholt Road, which is a regional road connecting to the M7 motorway.

The site currently contains a car dismantling and auto recycling yard and includes the sale of second hand motor vehicle parts. This property includes a number of buildings associated with this use including offices, sales area, and sheds, including one for a car press. Car parking for visitors and employees is at the front of the site. The majority of the site however is taken up with car bodies as can be seen on the aerial photograph in Figure 1.

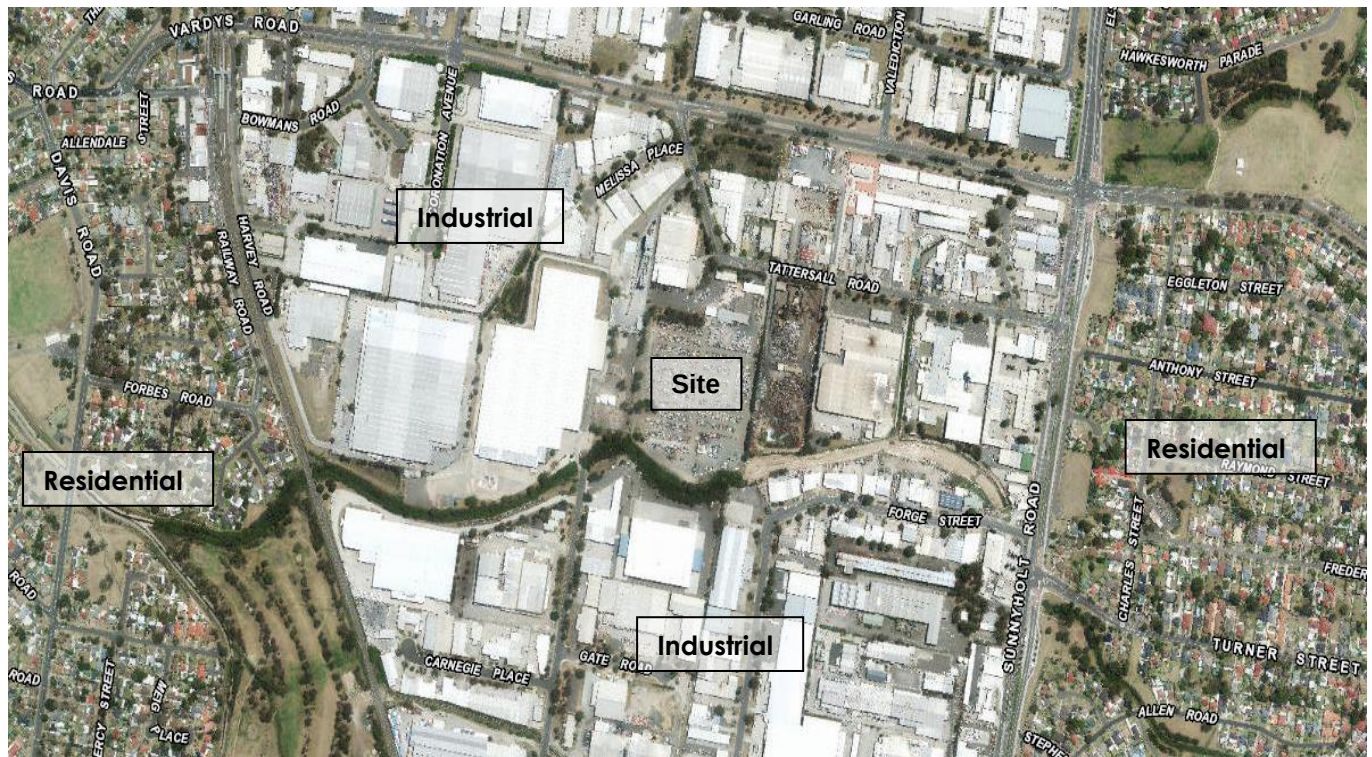


Figure 2: Aerial photo of locality

3 Pick n' Payless Recycling Facility

3.1 Existing Approvals

Notice of Determination No. 14314 (DA 96-185) was issued on 8th March 1996 for the existing "Car Dismantling Yard and Sale of Motor Vehicle Parts".

Under then Blacktown LEP 1988 the use of "Car Dismantling Yard and Sale of Motor Vehicle Parts" was encompassed by the definition "junk yard". A 'junk yard' meaning land used for the collection, storage, abandonment or sale of scrap metals, waste paper, rags, bottles or other scrap materials or goods used for the collecting, dismantling, storage, salvaging or abandonment of automobiles or other vehicles or machinery or for the sale of parts thereof.

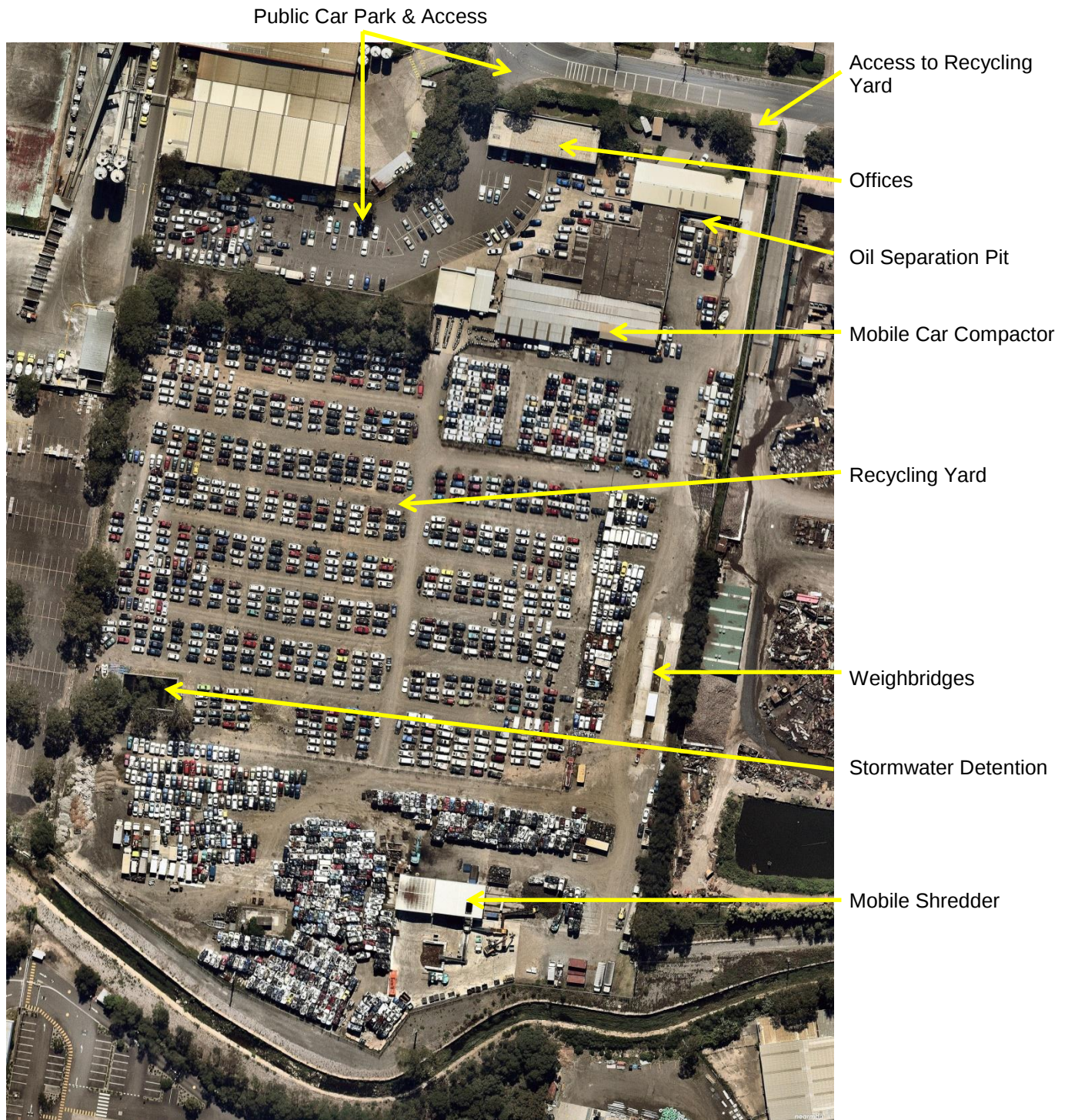
The development consent permits operation of the site between 8am and 5pm Monday to Sunday. However, the actual hours of operation of the different components of the business are:

- sale of motor vehicle parts: Monday to Sunday 8am – 5pm; and
- recycling of car bodies, Monday to Friday, 8am – 5pm.

The process at the yard for recycling a car involves the following steps:

- (a) Upon receipt of a car for recycling at the wrecking and dismantling yard, all oils and fuels are removed for safe storage and disposal.

- (b) The car then remains at the wrecking and dismantling yard for around 90 days during which time, all spares suitable for resale are removed from the car.
- (c) The car is then transferred to the recycling yard.
- (d) The fuel tank is then removed by specialist equipment. The minimum time within which a fuel tank can be removed is 6 minutes, limiting the number of cars that can be processed to 10 cars per hour. Assuming that the site operates at its absolute maximum capacity, this bottleneck restricts the capacity of the site to 90 cars per day.
- (e) The car is then placed in the shredder.



Notice of Determination No. 14314 does not place a restriction on the volume of material that can be processed at the site but the statutory processing limit for the recycling of scrap metal on the site is 30,000

tonnes per annum (tpa). The operator has been processing approximately 5,400 tpa (450 tonnes of cars per month) using a car press.

The operator has recently installed a weighbridge and upgraded the old car press with new machinery including:

- a mobile hammermill shredder; and
- a shear.

Blacktown City Council have confirmed that the new equipment is ancillary to the existing approved use of a 'junk yard' for the purpose of vehicle dismantling and sale of motor vehicle parts.

The new equipment has a greater processing capacity than the car press, with the hammermill shredder capable of accepting cars with the fuel tanks removed at a rate of around 25 cars per hour. However, under existing arrangements, the minimum time within which a fuel tank can be removed is 6 minutes, limiting the number of cars that can be processed to a maximum of 10 per hour or 90 cars per day. Based on an average car weight of 900 kilos and assuming that the site operates at an absolute maximum capacity of 9 hrs/day x 365 days, the existing facility cannot handle more than 81 tonnes of scrap metal per day or 29,565 tonnes per year. However, the actual processing capacity is significantly less than this when taking into account scheduled shutdowns for maintenance and the recycling facility only operating from Monday to Friday.

Therefore, the expansion of the approved operations are required in order to respond to changes in market demands and to improve broader resource recovery outcomes for the business.

An application in accordance with section 96 of the EP&A Act has been lodged with Blacktown City Council to modify the existing development consent (Notice of Determination No. 14314). The section 96 application includes a reconfiguration of the approved site layout to separate the Pick n Payless operations from the car shredding process.

A development application has also been submitted for relocation of the shredder to the north-west corner of the site; and to change the operations to include scrap metal recycling.

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The section 96 application and development application are yet to be determined.

3.2 Description of Proposed Development

The proposed SSD application will seek a new development consent for the operation of a metal recovery and recycling facility. The application will seek approval for:

- a processing capacity of 130,000 tonnes of scrap metal per year; and
- to include the processing and recycling of metal from sources including motor vehicles, structural metals and whitegoods.

The scrap metal processing facility is to be located in the north-western corner of the site, away from the Breakfast Creek and the flood hazard. The concept site layout is included as Appendix A.

The shredder, shear, associated floc separating equipment, loading/unloading areas and material stockpiles will all be located on a concrete slab. The machinery and processed material stockpiles will also be located within bunded areas under open sided sheds. Acoustic and air quality testing will be undertaken to support the provision of 'open sided' sheds.

Stormwater from the processing area will be collected and discharged via OSD/water quality devices. Details will be submitted with the SSD application.

The de-tanking and de-gassing of scrap metal products delivered to the facility will be carried out in the north-eastern corner of the site, generally in the same location as the existing End of Life De-pollution facility. Details on de-gassing and de-tanking will be provided with the SSD application.

Processed material will be stored in bins and removed off-site daily. Processed material that cannot be transported off-site due to closure times of receiving facilities will be stored over-night and removed the next day.

Trucks will enter the site via the north-eastern driveway, drive over the weighbridge and along the perimeter of the site to the north-western processing area. Trucks will exit the site via the weighbridge and north-eastern driveway.

The vehicle storage yard associated with the existing Pick n Payless business operations will be reduced in size and fenced off from the metal recycling area. The public will continue to access Pick n Payless via the existing car park. The general public will be unable to access the metal recycling area.

The changes to the site layout will allow the operator to deliver improvements in site management and, as such, an Environmental Management Plan (EMP) will be prepared and submitted with the EIS to ensure that environmental compliance is met and that the facility is meeting Best Practice Management.

No change is proposed to:

- Site boundaries
- The location of existing buildings
- Site ingress / egress to and from Tattersall Road.

1. Equipment

The Thor 2121K mobile shredder which was purchased in 2016 at a cost of 4 million dollars.

Capital investment in new equipment and sheds associated with the SSD includes:

- | | |
|------------------------|--------|
| • Vezzani PC1626 Shear | \$3M |
| • 2 loaders | \$830K |
| • Small excavator | \$300K |
| • Container filter | \$150K |
| • Processing shed | \$1.5M |

The total CIV will be approximately \$5.8. A detailed CIV calculation will be prepared as part of the EIS.

The requirement for additional plant and equipment required to process the additional volume of material will be considered in the EIS prepared as part of the SSD application. This may have implications for the final site layout.

Mobile Hammer Mill/Shredder

The THOR 2121K is designed and built by the ZB Group, a scrap and recycling specialist based in northern Spain. It is a fully mobile hammer mill shredder consisting of two parts, the hammer mill shredder and the power pack. Both can move by themselves powered by diesel engines.

The Thor 2121K is the first mobile system with a hammer mill big enough to mince up entire auto wrecks. It also separates metallic from non-metallic scrap and moves it over conveyor belts to separate skips.

Length 18.6 metres
Width 3.95 metres
Height 6.1 metres
Weight 115 tonne



Figure 1: Thor 2121K Mobile Hammer Mill

THOR 2121K is suitable for processing various ferrous scrap, whole car shells, other pieces of body work, fuel engines, or aluminium scrap. It can process between 30 and 40 tonnes of scrap metal per hour depending on the input material and its density. Material is fed in via the tilting sliding gutter or the internal steel plated conveyor. Outfeed is by means of a foldable conveyor belt.

The Thor 2121K is designed to work in dusty and warm environments and therefore the engine is equipped with heavy duty air filters and an oversized radiator for 50°C ambient temperature.

To control blue smoke emissions and dust the Thor 2121K is to be fitted with a Dust-Buster Spray System. This system is a dust control solution which injects foam and foaming chemical into the shredder to capture dust before it escapes into the air, vastly reducing emissions and improving working conditions.

This system uses just a small fraction of the water needed when water is the only treatment. It is installed by removing a liner bolt on each side of a shredder's hood and replacing each with a foam nozzle. The flow rates are tailored to the tonnage rates/hour being processed through the shredder.

The Dust-Buster system is low-maintenance and is designed for continuous operation. The system includes an industrial-rated water pump and chemical pump, water and air flow meters, pressure gauges for air, water and chemicals and a prewired control panel with disconnect.

The foam agents are designed to reduce the damage that dust can do to workers' respiratory systems and equipment. They also permeate the area where explosive gases can accumulate, preventing or reducing the intensity and velocity of shredder explosions. The US manufacturer, Midwest industrial Solutions, estimates that the Dust-Buster System reduces the frequency and velocity of explosions by 50% to 80%.

The foam is environmentally safe, biodegradable, nonhazardous, VOC-and solvent-free and is easily diluted. The environmental benefits of using the foam suppressant dust control solution are:

- Reduces dust emissions by up to 85%;
- Decreases disposal costs by lightening residual waste by 60%-90%;
- Controls blue smoke emissions from the shredder;
- Does not release dust downstream at transfer points; and
- Reduces water consumption.

Shear

The Vezzani PC 1626 AC is an Italian made heavy duty stationary inclined shear. The shear has a weight of 240 tonnes and dimensions of 18.2m (l) x 7.75m (h) x 5.2m (w). The loading platform has a height of 5.2m and the hopper box dimensions of 2.5m (w) x 7.35m (l).



The machine comprises a hopper into which product is loaded and fed in a controlled manner into the guillotine compartment. The guillotine compartment is a steep chute with hydraulically controlled sides and blade, and processed material exits at the base of this chute. Vezzani's patented gravity feed on a 30° incline allows continuous processing of bulky and long-dimension scrap.

The shears operator works from an elevated control cabin which can view material in the hopper and controlling the arm which feeds material into the guillotine chute. This control cabin is located on a metal tower at the rear of the machine. The shear is proposed to be located on a concrete slab which will be an extension of the existing concrete slab.

The Vezzani PC-AC shear has the capability to process all ferrous and non-ferrous applications, including large ferrous metal objects such as steel beams, plates and fabrications by cutting them into short lengths suitable for shipping direct to steel smelting plants.

2. Type of waste metals to be processed.

The types of scrap metal to be processed will comprise the following:

- Aluminium cans, loose scrap, profiles, pipes, sumps, pressed scrap bales, scrap bales and engine blocks
- Metal Scrap metal cans, pressed metal scrap bales, scrap bales, car parts, sheared cars, flattened cars, entire cars
- White Goods all small, medium and large sized white goods and appliances

Motor vehicles are expected to constitute approximately 20% of the total volume of scrap metal processed annually. Approximately 80% of all motor vehicles will be sourced from the trade industry, with the other 20% supplied by individuals.

The other 80% of scrap metal to be processed annually will be whitegoods, loose scrap, aluminium and structural metals. The primary supply sources are waste companies, scrap metal merchants, landfill

operators and demolition. While provision is to be made for a drop-off area for the general public, it is expected to constitute a minor proportion of the total volume of whitegoods and loose scrap processed annually.

3. Operating hours and staffing levels.

The proposed hours of operation are 24 hours a day, 7 days a week. The machines will operate for 12 hours from 6am to 6pm, with a maintenance crew working from 6pm to 6am.

It is envisaged that the proposed expansion will generate a minimum of 11 additional fulltime positions.

4. Material Storage

The proposal is for the same day processing of scrap metal delivered to the site.

All processed material will be containerised, with both scrap metal and floc collected and removed from the site by truck on a regular basis through each working day. Any containers (bins) that are not filled by the end of the day are closed and removed from the site the following day when filled. Processed material that cannot be transported off-site due to closure times of receiving facilities will be closed, stored overnight and removed the next day.

In terms of unprocessed storage capacity, accommodation will be for 3 days of stockpiling. It is unlikely that there would be a shut-down for longer than this but in the event that a longer shut-down did occur, then deliveries of material to the site would be stopped until the stockpiles were cleared.

In the event of the plant being shut down, processed material will still be removed from the site.

5. Environmental management

In relation to water quality, preliminary stormwater investigations confirmed that the site drains to a large on-site detention tank and oil and water separator located near the western boundary of the site. The system then discharges treated stormwater to Breakfast Creek via a single discharge point.

Stormwater from the processing area will be collected and discharged via OSD/water quality devices. Details will be submitted with the SSD application.

The de-tanking and the de-gassing of scrap metal products will be carried out in the north-eastern corner of the site, generally in the same location as the existing End of Life De-pollution facility where motor vehicles are currently drained of all fuels, oils, fluids and lubricants. The activities will be carried out in an enclosed and bunded facility with storage tanks from which the waste fluids and gases will be collected by licensed contractors. Vehicles awaiting de-pollution are stored in the existing hard stand area adjacent to the current End of Life De-pollution facility which is drained to a collection pit in order to intercept any leakages. Details on de-gassing and de-tanking will be provided with the SSD application.

4 Legislative Framework

4.1 Commonwealth Legislation

4.1.1 Environment Protection and Biodiversity Act 1999

The Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) relates to the protection of the environment and the conservation of biodiversity.

The objectives of the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) are to:

- provide for the protection of the environment, especially matters of national environmental significance
- conserve Australian biodiversity
- provide a streamlined national environmental assessment and approvals process
- enhance the protection and management of important natural and cultural places
- control the international movement of plants and animals (wildlife), wildlife specimens and products made or derived from wildlife

- promote ecologically sustainable development through the conservation and ecologically sustainable use of natural resources
- recognise the role of Indigenous people in the conservation and ecologically sustainable use of Australia's biodiversity
- promote the use of Indigenous peoples' knowledge of biodiversity with the involvement of, and in cooperation with, the owners of the knowledge.

The EPBC Act focuses Australian Government interests on the protection of matters of national environmental significance and there are nine matters of national environmental significance to which the EPBC Act applies:

- world heritage properties
- national heritage places
- wetlands of international importance (often called 'Ramsar' wetlands after the international treaty under which such wetlands are listed)
- nationally threatened species and ecological communities
- migratory species
- Commonwealth marine areas
- the Great Barrier Reef Marine Park
- nuclear actions (including uranium mining)
- a water resource, in relation to coal seam gas development and large coal mining development.

A search using the Department of the Environment & Energy's Protected Matters Search Tool was undertaken on 20th March 2017 by Barker Ryan Stewart (BRS). The search found that the site does not lie within a specified protected area and does not contain ecological habitat for nationally listed threatened species, habitats or migratory species. Furthermore, the proposed expansion of the existing facility does not involve any actions that could be expected to have a significant impact on any matter of national environmental significance.

It is considered that the proposal would not require Commonwealth approval under the provisions of the EPBC Act. However, the need for a referral will be further assessed during the preparation of the EIS.

4.2 NSW State Legislation

4.2.1 Environmental Planning and Assessment Act 1979 (EP&A Act)

The EP&A Act and the NSW Environmental Planning and Assessment Regulation 2000 (EP&A Regulation) provide the framework for environmental planning and assessment in NSW.

Part 4 of the EP&A Act relates to development assessment, including Division 4.1 which specifically relates to development that is declared as State Significant Development (SSD).

Section 89C(2) of the EP&A Act states that a:

... State environmental planning policy may declare any development, or any class or description of development, to be State significant development.

State Environmental Policy (State and Regional Development) 2011 (the SRD SEPP) defines certain development that is SSD. Clause 8 of the SRD SEPP states:

- (1) Development is declared to be State significant development for the purposes of the Act if:
 - (a) the development on the land concerned is, by the operation of an environmental planning instrument, not permissible without development consent under Part 4 of the Act, and
 - (b) the development is specified in Schedule 1 or 2.

The recycling facility meets the requirement of Clause 8(1)(b), being development specified in Schedule 1 of the SRD SEPP. Schedule 1 Clause 23(3) of State Environmental Planning Policy (State and Regional Development) 2011 triggers SSD where resource recovery or recycling facilities handle more than 100,000 tonnes per year of waste.

23 Waste and resource management facilities

...

- (3) Development for the purpose of resource recovery or recycling facilities that handle more than 100,000 tonnes per year of waste.

The metal recovery and recycling facility is a development for the purposes of resource recovery and is a recycling facility which is proposed to handle more than 100,000 tonnes of waste metal per year.

Under Section 89D of the EP&A Act, the Minister for Planning is the consent authority. A DA for SSD must be accompanied by an EIS, prepared in accordance with the EP&A Regulation. Before preparing an EIS, an applicant must request SEARs for the preparation of the EIS.

4.2.2 Other relevant legislation and policies

A summary of legislation (including planning instruments) and policies relevant to the metal recovery and recycling facility is provided below.

Legislation/instrument	Comment
Protection of the Environment Operations Act (POEO Act)	Proposed activities at the recycling facility are listed under Schedule 1 of the POEO Act as 'Metallurgical' activities. Specifically, scrap metal processing facilities with the capacity to process more than 150 tonnes of scrap metal per day or 30,000 tonnes per year (if not carried out wholly indoors) or 50,000 tonnes per year (if carried out wholly indoors) are classified as a "scheduled activity" under the Act. Accordingly, an environmental protection licence (EPL) will be required. Under Section 89K of the EP&A Act, an application for an EPL cannot be refused if it is necessary for carrying out a SSD authorised by development consent.
NSW Water Management Act 2000	Under Section 89J of the EP&A Act, water use approvals, water management works approvals and controlled activity approvals are not required for development that is SSD.
Threatened Species Conservation Act 1995	The majority of the site has been extensively disturbed through its use for the recycling of vehicles, with a large proportion of the land being covered with either hardstand or existing site buildings and infrastructure. As such, the site has little ecological value. No endangered populations or endangered ecological communities are located on or near the site and the site does not support an "Endangered Ecological Community" (EEC) identified under Part 3 of Schedule 1 of the TSC Act 1995. It is highly unlikely that any threatened species, population or endangered ecological community would be impacted by the project. The EIS will document the existing environment, with a focus on the assessment of the remaining trees at the site, especially along the Breakfast Creek boundary.
NSW Contaminated Land Management Act 1997	The Development Consent (DA 15-291) granted by Blacktown City Council on 8th March 1996 contained the following Deferred Commencement condition: <i>The development consent is not to operate until such time as:-</i> (a) <i>Site remediation works are to be undertaken in accordance with investigation report prepared by ADI Services dated 10th October 1995. In this regard the remediation is to include the removal of surface soils in localised areas where concentrations of zinc, lead and copper exceeded the proposed clean up criteria as outlined on page 13 of the investigation report. Such material is to be removed off-site to an EPA registered landfill. A similar procedure of soil removal is to take place in the vicinity of the underground storage tank excavations namely sample No. 024 referred on page 16 of the report where concentration of TPH</i>

(C10-C0) exceeded EPA NSW Guidelines for assessing service station sites. This localised area of product based contamination is also to be removed to an EPA registered landfill.

- (b) All site remediation works as outlined in (a) above are to be completed to the satisfaction of Council and validated by a suitably qualified independent environmental consultant engaged under the terms of Council's Policy and Procedures for the Determination of Rezoning Development and Building Applications involving "Contaminated Land".

As a result the site is well understood, however additional site investigation and assessment will be undertaken as part of the EIS.

NSW Waste Avoidance and Resource Recovery Act 2001

The NSW Waste Avoidance and Resource Recovery Act 2001 aims to encourage efficient use of resources and reduce environmental harm, through the principles of ecologically sustainable development and considering resource management options against the hierarchy of avoid, reuse and dispose.

The metal recycling and recovery facility and proposed increase in the volume of material handled is consistent with these objects through enhanced services for more quantities of resources to be recovered and recycled, thereby decreasing the need for waste going to landfill. The proposal is consistent with these objects through continual reduction in waste generation.

SEPP (State and Regional Development) 2011

The recycling facility is SSD as it meets the requirements of Clause 23(3) of Schedule 1 of SEPP SRD, being a resource recovery and recycling facility that handles more than 100,000 tonnes per year of waste.

SEPP (Infrastructure) 2007

In accordance with clause 121 a resource recovery facility is permissible with consent in the IN1 General Industrial zone and is required to be referred to the RMS under Schedule 3 (Traffic Generating Development).

SEPP 33 Hazardous and Offensive Development

SEPP 33 applies to development of potentially hazardous industry. It requires the consent authority to consider whether an industrial development is a potentially hazardous industry or a potentially offensive industry. The EIS will consider if the recycling facility would be a potentially hazardous industry.

A preliminary hazard analysis/assessment would need to be prepared and submitted with the EIS. Subject to compliance with the recommendations of the preliminary hazard analysis/assessment (and other reports) and relevant Australian standards, it can be concluded that the proposal would not constitute hazardous or offensive development under the SEPP.

SEPP 55 Remediation of Land

Site contamination assessment and remediation work have previously undertaken in accordance with Notice of Determination No. 14314 dated 8th March 1996 (DA 96-185), confirming the sites suitability for ongoing industrial use. However, further investigation will be undertaken as part of the EIS to identify areas of environmental concern, if any, and to confirm the site's ongoing suitability for industrial land use.

Regional Plans

'A Plan for Growing Sydney' sets out the State Government's vision for Sydney and is intended to guide land use planning decisions for the next 20 years.

The proposed development is consistent with Direction 1.4, to "transform the productivity of Western Sydney through growth and investment".



Photo: An extract from 'A Plan for Growing Sydney', page 38) - Industry, Kings Park

Local Plans

The site is zoned IN1 General Industrial under Blacktown Local Environmental Plan (LEP) 2015. The objectives of zone are:

- To provide a wide range of industrial and warehouse land uses.
- To encourage employment opportunities.
- To minimise any adverse effect of industry on other land uses.
- To support and protect industrial land for industrial uses.
- To enable other land uses that provide facilities or services to meet the day to day needs of workers in the area.
- To minimise adverse impacts on the natural environment.

A resource recovery and recycling facility is permissible in the zone with consent with consent. The LEP defines a 'resource recovery facility' to mean a building or place used for the recovery of resources from waste, including works or activities such as separating and sorting, processing or treating the waste, composting, temporary storage, transfer or sale of recovered resources, energy generation from gases and water treatment, but not including re-manufacture or disposal of the material by landfill or incineration.

As the proposed development is permissible and approved metal recycling operations already occur on the site, it is considered that the proposal meets the zone objectives.

The site is mapped as containing Terrestrial Biodiversity (Sheet BIO_013).



Figure 3 : Blacktown LEP 2015, Terrestrial Biodiversity Map, Sheet BIO_013

The subject site is only marginally affected by the terrestrial biodiversity mapping and as shown in the photo below, the majority of the terrestrial biodiversity mapping overlays a sealed car park on the adjoining land to the west.

There are a number of trees located along the property boundary within the mapped terrestrial biodiversity. These trees will not be affected by the proposal and a landscape vegetation plan to be prepared and submitted with the EIS will include measures to safeguard these trees.

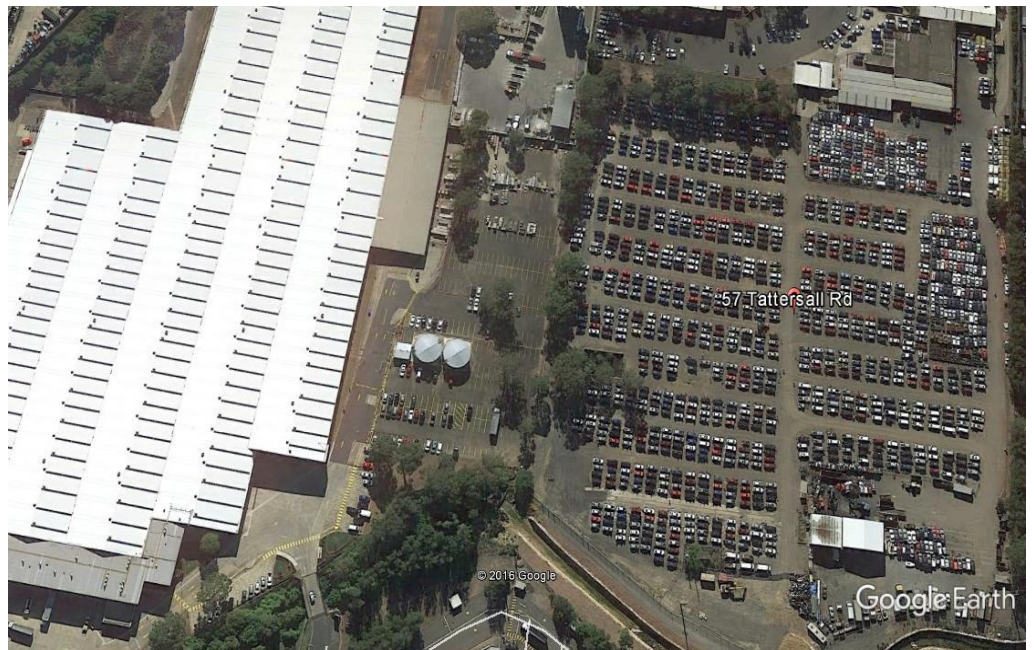


Photo : Source, Google Earth (Imagery date 15/10/2016)

5 Preliminary Environmental Assessment

As previously stated, development consent was granted for the existing "Car Dismantling Yard and Sale of Motor Vehicle Parts" facility in March 1996.

The environmental impacts associated with the handling of an additional 100,000 tpa of scrap metal have been considered and the likely impacts and environmental risks are presented below.

Issue	Potential Environmental Impacts
Air quality	The processing and crushing of waste material and the movement of vehicles and materials has the potential to generate dust. A quantitative air quality assessment of the proposed site operations will be undertaken as part of the EIS.
Traffic	The site has two access points off Tattersall Road, including an entrance for the primary car park and an entrance along the eastern property boundary providing access to the vehicle storage and recycling facility. No change to site access arrangements is currently proposed. The expanded capacity of the metal recovery and recycling facility has the potential to generate additional truck and vehicle movements associated with the capacity process higher volumes of recycled material. A Traffic Impact Assessment will be prepared and submitted with the EIS.
Noise & Vibration	Site related noise emissions are generated from fixed and mobile plant and equipment and include: • Vehicle movements such as trucks and front end loaders; • Hammermill and shredder; • Reversing alarms on trucks, etc. The nearest residential receivers to the site are located approximately 550m to the east. Whilst the residential development is relatively remote from the site there is potential for the site operations to generate noise. An Acoustic and Vibration Assessment will be prepared and submitted with the EIS.
Water Quality, Stormwater Flooding	The site is adjacent to Breakfast Creek and the southern part of the site is and potentially affected by flooding. A flood assessment will be undertaken to assess the potential impacts and ensure that there is no loss in flood storage volume as a result of the proposed works. The existing surface water management system will be utilised where possible, with modification undertaken where required to ensure appropriate treatment is achieved. The EIS will include a surface water assessment which will specifically discuss water quantity (including on-site detention), water quality, flooding, wastewater, conceptual erosion and sediment controls and a description of the water demands, including any trade waste licencing requirements. The EIS will also provide a qualitative assessment of the existing groundwater environment, an analysis of the potential of the proposal to impact this system, and will elaborate on any required mitigation measures.
Soils and contamination	Site contamination assessment and remediation works were undertaken in accordance with Notice of Determination No. 14314 dated 8th March 1996 (DA 96-185), which confirmed the sites suitability for ongoing industrial use.
Ecology	The site is significantly disturbed and cannot be considered as containing natural or useful habitat for native flora or fauna species. No endangered populations or endangered ecological communities are located on or near the site and the site does not support an "Endangered Ecological Community" (EEC) identified under Part 3 of Schedule 1 of the TSC Act 1995. The site also does not support a threatened ecological community as listed

under the EPBC Act.

There are trees along sections of the property boundaries. These trees will not be affected by the proposal. A landscape vegetation plan will be prepared and submitted with the EIS.

Visual

There are no residences within immediate proximity to the site, with the closest residential areas approximately 550m from the site. Due to the topography and other industrial developments adjacent to the site, the site cannot be seen from the closest nearby residences.

The proposal is anticipated to result in minor to negligible change in the current visual amenity of the locality. The site is within an industrial area with a number of large-scale operations. Directly adjacent to the east is the Sell & Parker metal recycling facility where waste metal is received, sorted and crushed.

The appearance of the activities to be undertaken are in keeping with the industrial landscape.

Notwithstanding, a Visual Impact Assessment and a landscape vegetation plan will be prepared and submitted with the EIS.

Given the potential impacts described above, it is anticipated that the following environmental aspects would need to be addressed in detail in the EIS:

- Stormwater management
- Noise & vibration
- Air quality (including odour & dust)
- Soil & water (including flooding)
- Preliminary hazard assessment
- Waste management strategy
- Transport, access and parking (including SIDRA traffic modelling for the Sunnyholt Road/Vardys Road and Sunnyholt Road/Tattersall Road intersections)

6 Project Justification

The metal recovery and recycling facility and ancillary activities have many benefits from an economic, social and environment perspective, as it:

- diverts recyclable and reusable wastes from landfill, including co-mingled waste for which there are few recycling alternatives;
- diverts these wastes from landfill will preserve space within landfills for general waste (putrescible) extending the life of these landfills;
- provides a commercial return and will contribute to the economy of NSW; and
- provides employment for a minimum of 11 additional people within the recycling facility.

The proposal to expand the existing facility will contribute to its long term economic viability.

7 Proposed Consultation

Autorecyclers Pty Limited recognises that engagement and consultation with stakeholders is integral to the operation of the facility and will consult appropriately. Key stakeholders that will be consulted in the preparation of the EIS include:

- The Department of Planning and Environment
- The Environment Protection Authority
- Roads and Maritime Services;
- NSW Office of Water;

- Sydney Water
- Blacktown City Council; and
- adjacent industrial landusers.

8 Conclusion

The Proposal is classified as SSD on the basis that it falls within the requirements of Clause 23(3) of Schedule 1 of SEPP SRD, being a resource recovery and recycling facility that handles more than 100,000 tonnes per year of waste.

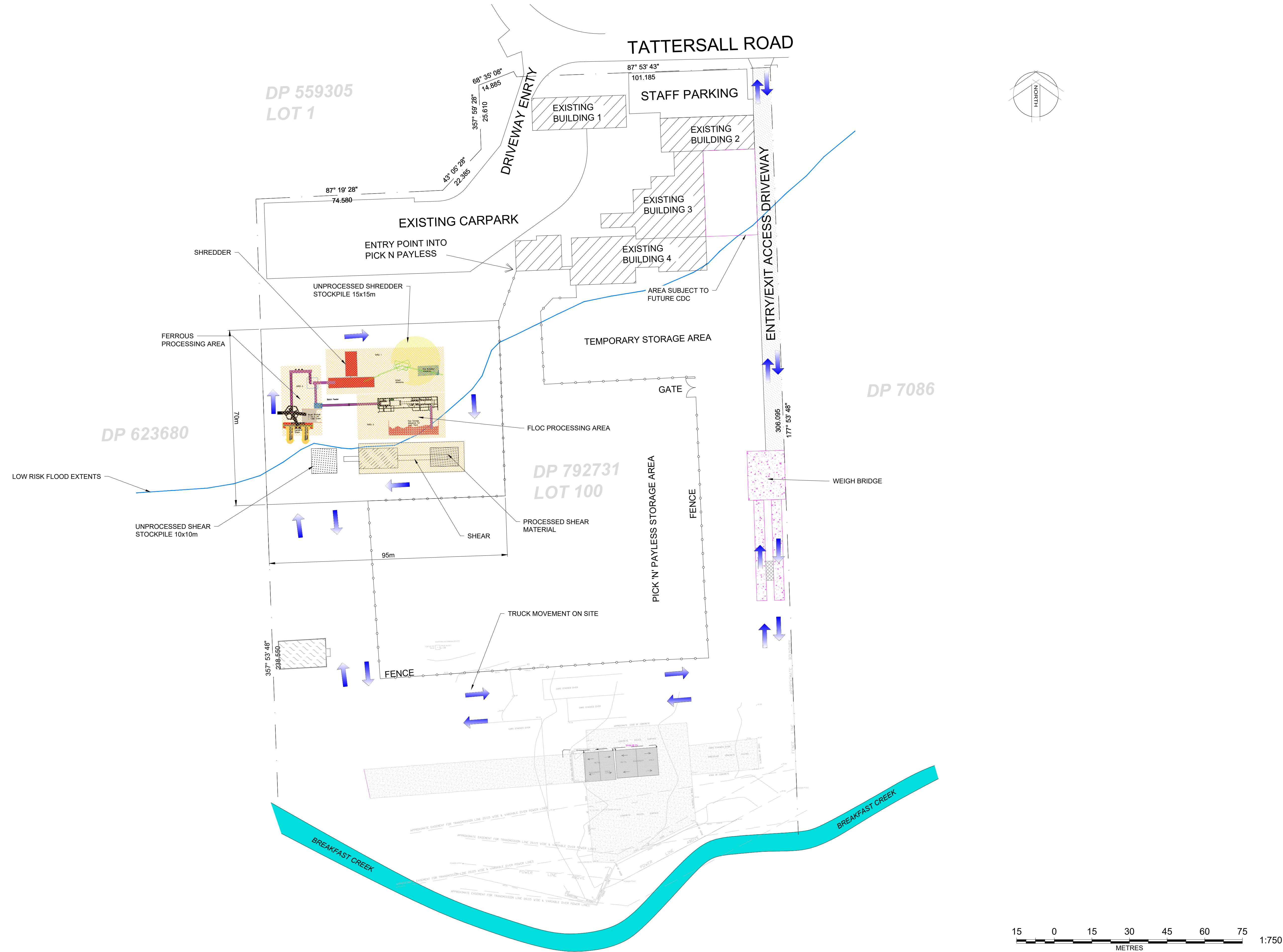
Barker Ryan Stewart Pty Ltd trusts that the information contained in this correspondence is sufficient to enable the Secretary to issue the environmental assessment requirements for an EIS. Should there be any further queries please do not hesitate to contact Ian Stewart on 4325 5255.

Yours faithfully

Ian Stewart | Director
Barker Ryan Stewart Pty Ltd

APPENDIX A

CONCEPT SITE LAYOUT



No	DATE	AMENDMENT
A	15/06/17	ISSUED FOR INFORMATION



SYDNEY
P. 02 9659 0005
CENTRAL COAST
P. 02 4325 6255
HUNTER
P. 02 4966 8388
ABN: 26 134 067 842
barkerryanstewart.com.au
mail@barkerryanstewart.com.au

Client:
AUTORECYCLERS PTY LTD

PROPOSED DEVELOPMENT AT
57-69 TATTERSALL ROAD, KINGS PARK NSW 2148

SEAR LAYOUT PLAN

Designed: RW
Drawn: RW
Checked: IS

Scales: Plan 1:750
Horiz.
Vert.
X-Sect.

Datum: A.H.D.

Plan No.
CC16136P3-01

File Ref.
CC16136P3.dwg

SHEET 1 OF 1 SHEETS

REV.
A