

27 November 2018

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Re: Application for Secretary's environmental assessment requirements for a proposed waste recycling and transfer facility, Toongabbie Road, Girraween

Dear Sir/Madam,

1 Introduction

This letter requests Secretary's Environmental Assessment Requirements (SEARs) in accordance with Part 4 of the *Environmental Planning and Assessment Act 1979* for a proposed waste recycling and transfer facility (the development) in Girraween, NSW (Cumberland Council local government area). This letter has been prepared by EMM Consulting Pty Limited (EMM) on behalf of Benedict Recycling Pty Limited (Benedict Recycling). As described below, the development will be a state significant development (SSD).

2 Site details

2.1 The site

The site is at 224–232 Toongabbie Road in Girraween and is legally described as Lot 678/DP 9157. The site is approximately 9,000 m². The site was previously a 'scrap metal recycling facility' although a far greater range of wastes were accepted onto the site. There have been a significant historical issues at the site, including the storage of a large volume of unauthorised waste in a stockpile on the eastern half of the site and uncontained waste tipped across the site (see Photograph 2.1 and Photograph 2.2).

The site was purchased by Benedict Recycling on 23 November 2018. The large stockpile was removed and the site cleaned up as part of the purchase negotiations (see Photograph 2.3 and Photograph 2.4). Benedict Recycling has no relationship to the previous site operators.

The site is zoned IN1 General Industrial under the Holroyd Local Environmental Plan 2013 (Holroyd LEP). The site has a 2005 development consent for a recycling facility with a limit of 30,000 tonnes per annum (tpa), however there is no currently Environment Protection Licence (EPL) for the site.



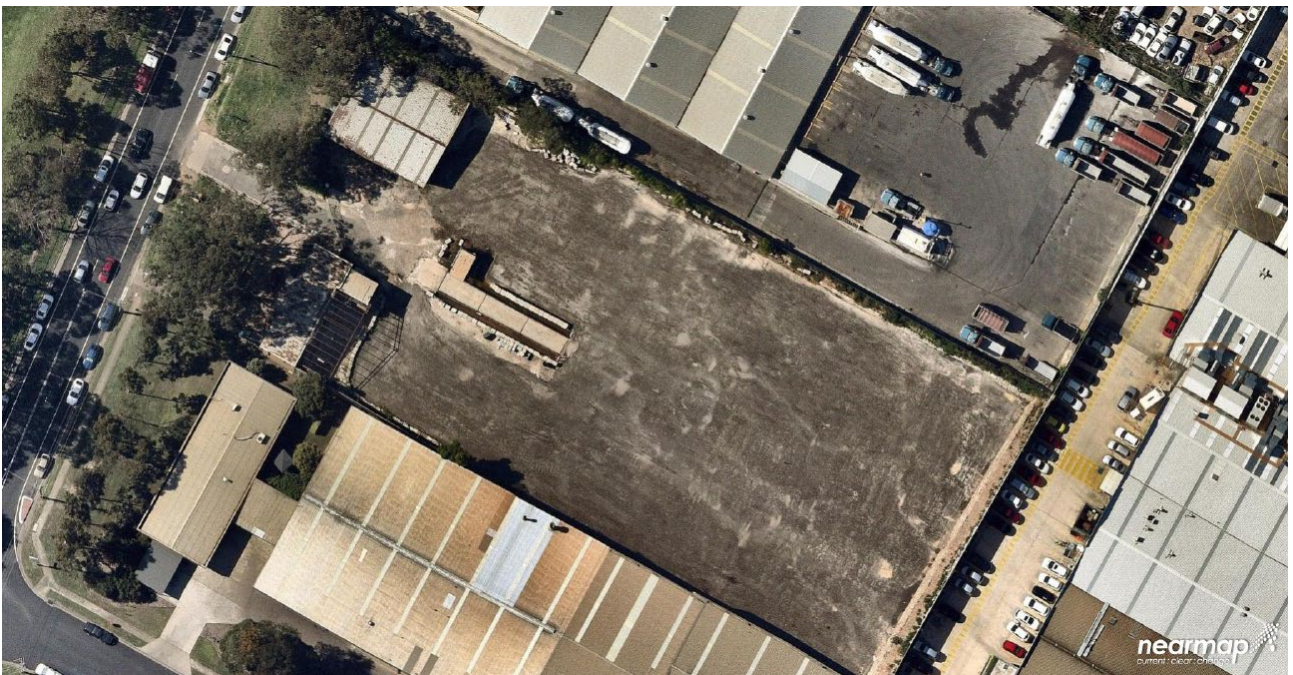
Photograph 2.1 View west across the site from top of the historical stockpile (29 January 2016)



Photograph 2.2 Aerial view of the site (11 February 2017)



Photograph 2.3 View to the east across the site to the location of the former stockpile (14 November 2018)



Photograph 2.4 Aerial view of the site (30 October 2018)

The site currently consists of:

- a level area (about 6,500 m²) that is covered with compacted Rotamill (a permeable, non-dusty covering made of recycled asphalt);
- a partially demolished two-storey brick and fibre-cement office building (about 10 m x 20 m, about 200 m²) near the front of the site on the south-western site boundary;
- an awning structure, currently an uncovered frame, (about 7 m x 15 m, about 105 m²) behind the office building on the on the south-western site boundary;
- a metal shed (about 16 m x 20 m, about 320 m²) near the front of the site on the north-eastern site boundary;
- a weighbridge and small weighbridge office close to the front of the site; and
- two driveways off Toongabbie Road.

The approved shed (about 20 m x 36 m, about 720 m²) immediately south-west of the two-storey office building will be reconstructed shortly.

Reticulated water and sewer are available to the site as well as electricity and telecommunications.

2.2 The surrounds

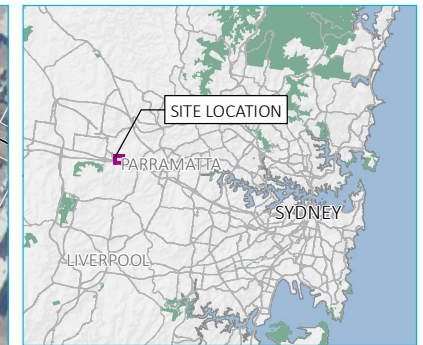
The site is located on Toongabbie Road, 400 m north of the Great Western Highway. The site is in an industrial estate, which is accessed via Toongabbie Road, Girraween Road, Amax Avenue and Mandoon Road. The M4 Motorway can be readily accessed from the site via the Great Western Highway.

There are industrial buildings to the east, north and south of the site. Fox Hills Golf Course is to the west of the site, on the opposite side of Toongabbie Road (see Figure 2.1).

The site's IN1 zoning extends to the east and north, with land to the west of the industrial estate (the golf course) zoned RE2 Private Recreation (Figure 2.2).

The nearest residences are at least 400 m from the site:

- a single residence about 400 m south of the site located on the far side of the Great Western Highway (between the highway and the M4 Motorway immediately to the south);
- residences on Akron Place, Boston Place and Oakwood Road about 410–500 m west of the site located on the far side of the golf course;
- residences along Mandoon Road about 470 m east of the site located on the far side of the industrial area;
- residences along Nicholls Way about 500 m south of the site located on the far side of the Great Western Highway and the M4 Motorway; and
- residences along Girraween Road about 500 m east south-east of the site located on the far side of the industrial area.

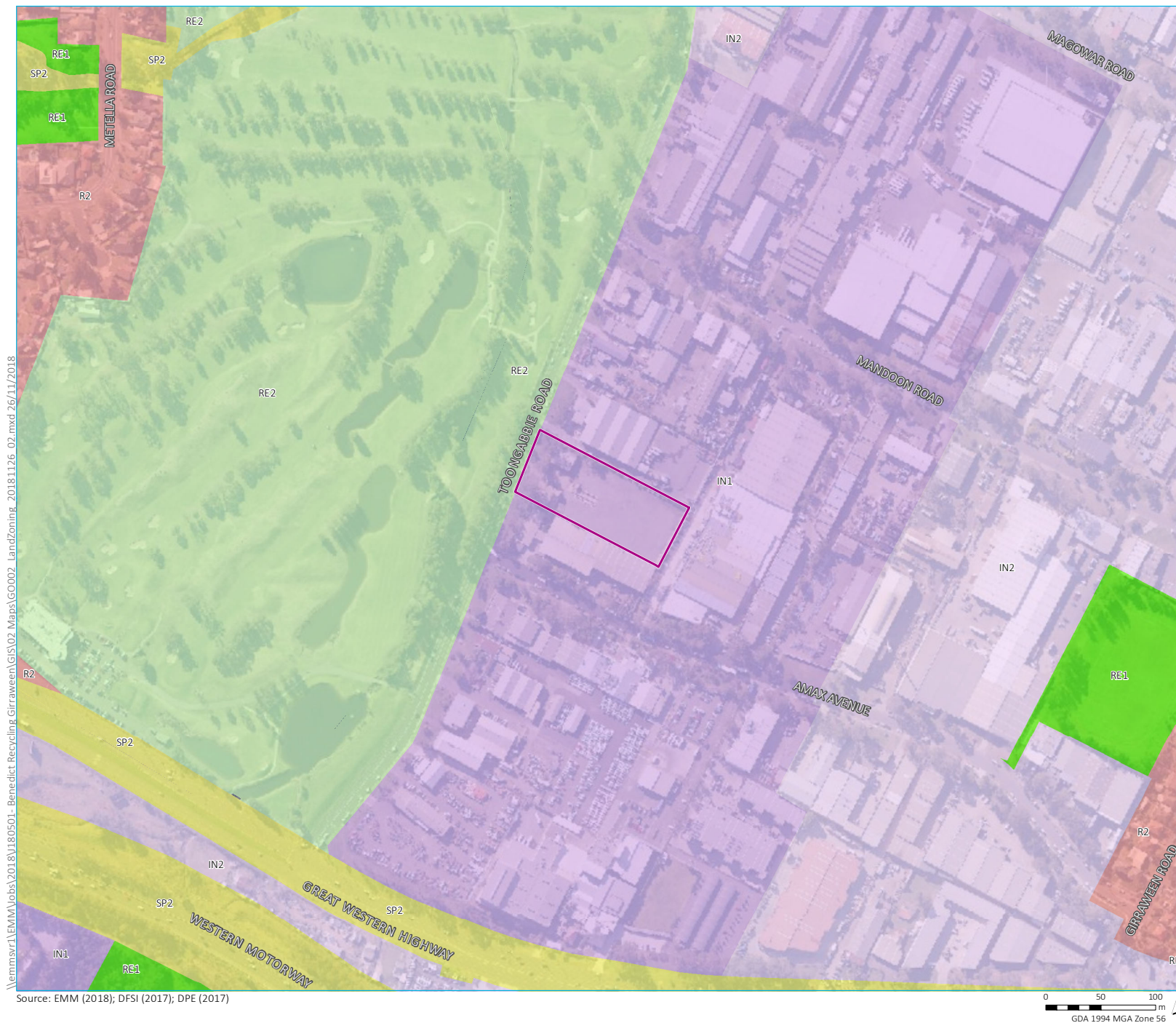


- KEY**
- Subject site
 - Main road
 - Local road
 - Watercourse/drainage line
 - Waterbody
 - Cadastral boundary

Site surrounds

Proposed Girraween Recycling and Transfer Facility

Figure 2.1



KEY

Subject site

Land zone

IN1 General Industrial

IN2 Light Industrial

R2 Low Density Residential

RE1 Public Recreation

RE2 Private Recreation

SP2 Infrastructure

Land zoning

Proposed Girraheen Recycling and Transfer Facility

Figure 2.2

3 Development description

The proposed facility would import up to 220,00 tonnes per annum (tpa) of co-mingled and segregated pre-classified general solid waste (non-putrescible) for recycling.

The wastes will be processed (screening and sorting) to produce saleable recycled materials. Some material will be transported to other company-owned licensed recycling facilities for further processing or will be transported to an EPA-licensed landfill if the material is not able to be recycled. Although crushing is permitted by the current consent, it is not proposed to crush any material on site.

No special, liquid, hazardous, restricted solid waste or general solid waste (putrescible), as defined in the *NSW Protection of the Environment Operations Act 1997* (POEO Act) and the Environment Protection Authority 2014 *Waste Classification Guidelines Part 1: Classifying Waste*, will be accepted by the facility. All of the materials brought onto the site will be taken from the site as finished products, residues for further processing, or as rejects for disposal at an EPA licensed landfill. There will be no materials land-filled or otherwise disposed anywhere within the site as a result of the proposed development.

Segregated recycled materials will be transported to other company-owned facilities or sent to other recycling firms for processing. These materials will include ferrous and non-ferrous metals, paper and cardboard, masonry (concrete, bricks, tiles) asphalt, fibreboard sheeting, gyprock, fines, and plastics.

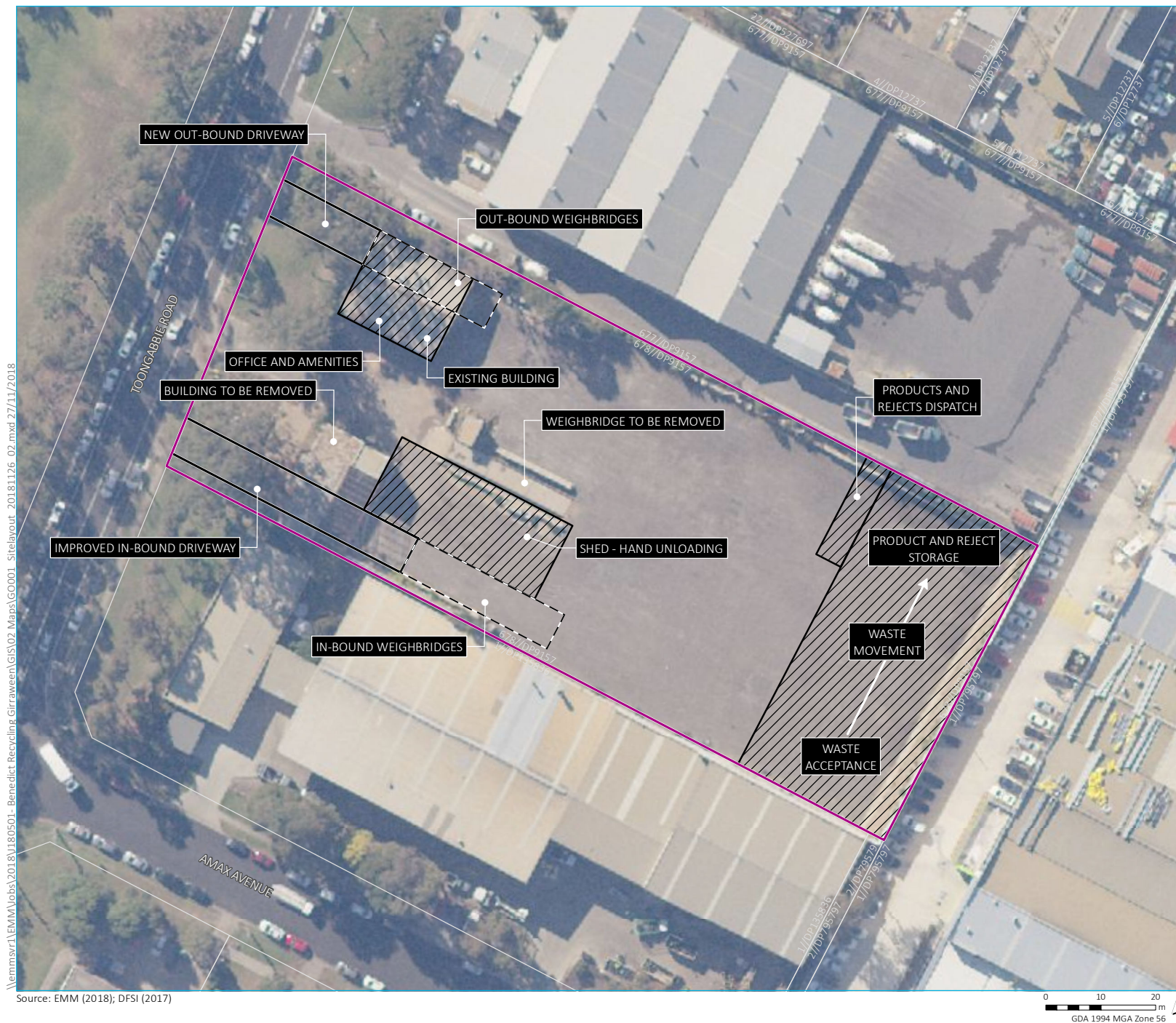
A conceptual site layout is provided in Figure 3.1.

3.1 Site components

3.1.1 Construction

It is currently envisaged that development construction will consist of:

- removing/demolishing:
 - the existing driveway in the middle of the site and landscaping the area;
 - the existing two-storey office building on the on the south-western site boundary of the site;
 - the existing weighbridge and associated weighbridge office;
- constructing:
 - a 7-m-wide in-bound driveway on the southern side of the site's frontage by widening the existing driveway;
 - a new 7-m-wide out-bound driveway on the northern side of the site's frontage;
 - a main waste acceptance and processing shed (about 30 m x 58 m, about 1,740 m² and about 12 m tall) at the rear of the site – the shed will be enclosed but with two openings (protected with a curtain of water misters) on the north-eastern wall to allow trucks to access and leave the shed;
 - sealed working surfaces (concrete or asphalt);
 - surface water controls, including a suitably-sized gross pollutant trap;



- KEY**
- Subject site
 - Shed
 - Weighbridge
 - Driveway
 - Cadastral boundary

Conceptual site layout

Proposed Girraween Recycling and Transfer

Facility Figure 3.1

- installing:
 - two in-bound weighbridges (about 10-m and about 22-m-long);
 - two out-bound weighbridges (about 10-m and about 22-m-long);
 - waste, product and rejects bays within the main shed;
 - a demountable in-coming weighbridge office;
 - marked staff and visitor carparking spaces;
 - marked traffic circulation;
 - demarcated pedestrian walk-ways;
 - fencing around the operational areas of the site and gates for the in-bound and out-bound driveways;
 - fire safety systems such as thermal imaging cameras controlling an automatic fire suppression system within the main shed;
 - tanks to store and reuse rain water from shed roofs;
- modifying the metal shed near the front of the site on the north-eastern site boundary to include the out-going weighbridges and doors for vehicle entry and exit; and to improve the existing offices and amenities;
- relocating the approved, and soon to be rebuilt, shed immediately south-west of the two-storey office building so that it is north of the new in-coming weighbridges;
- sealing the inside floors of the sheds with concrete and the whole of the site, other than the landscaped area, with asphalt or concrete;
- re-landscaping the front of the site; and
- in consultation with the Council, widen Toongabbie Road, and requesting Council to install no parking signs on the western side of the road to allow a second northbound lane (a bypass lane) to be constructed so that through vehicles can pass trucks turning into the site.

Construction is expected to take about 24 weeks.

3.2 Operations

3.2.1 Waste receival

Approval will be sought for the development to accept a total of 220,000 tpa tonnes per year of the following wastes:

- unsegregated and segregated construction and demolition wastes such as tiles, bricks, concrete, glass, metal, wood, asphalt, gyprock, vegetation and uncontaminated soils;

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

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

The site is accessible from Toongabbie Road via the Great Western Highway. Toongabbie Road is a major heavy vehicle route and is in the IN1 General Industrial zone. The site will accept inert waste from businesses and the general public. Accordingly, waste will be delivered to site by a variety of vehicles including:

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

The numbers of vehicle entering and leaving the site during operations can be estimated based on site records for Benedict Recycling's Chipping Norton recycling facility that accepts similar waste types. When the development is operating at maximum annual capacity (220,000 tpa), it is estimated that there will be a daily average of about 90 deliveries by light vehicles (ie carrying less than three tonnes) and about 66 deliveries by heavy vehicles (ie carrying 3 tonnes to about 32 tonnes) assuming that there will be less deliveries over the weekend than on weekdays. Variations around these averages are expected on any given day.

In-coming waste will be first inspected on the weighbridge. Any loads suspected to contain material that cannot be accepted by the site will be rejected and directed to the exit weighbridge. Vehicles will travel to the tipping areas and be unloaded and each load spread and thoroughly inspected. A docket will be issued. If unacceptable waste is identified, the waste will be re-loaded to the vehicle, the unacceptable load recorded in a site register available to the EPA, and the re-loaded vehicle will be directed out the exit weighbridge.

Light vehicles such as cars with box trailers and utilities will unload in the hand unloading shed. Heavy vehicles will unload in the main shed. This will segregate light and heavy vehicles.

3.2.2 Processing and dispatch

Waste processing will include sorting, picking, screening and stockpiling within the main shed. A range of mobile plant (eg two excavators and two front-end loaders) and a screening and picking line, will be used to handle and process the waste and products in the shed. Waste will be tipped in the southern half of the main shed and will move towards product bays in the north end of the main shed as it is processed.

Material processed in the shed will be stockpiled in segregated bays prior to dispatch.

Recycled products will generally be dispatched to customers, generally in the western Sydney region, by heavy vehicles. Outbound trucks will be parked underneath an awning with a double mist curtain barrier and will be side-loaded from bays within the main shed.

Some waste (less than 10%) is not yet able to be easily recycled (referred to as 'rejects'). Rejects will be stockpiled in bays prior to being sent to an EPA-licensed facility for disposal. Rejects will be loaded to trucks in the same manner as recycled products.

It is estimated that the dispatch of products and rejects and truck traffic for other site maintenance and consumables deliveries will require an average of about 23 trucks (generally truck and dogs) daily when the site is operating at its maximum annual capacity.

3.2.3 Total vehicle movements

In summary, there will be an average of about 390 vehicle movements per day, made up of:

- about 156 vehicles (a mixture of light and heavy vehicles) delivering waste (312 vehicle movements);
- about 23 trucks (generally truck and dog trucks) dispatching products and waste (46 movements); and
- about 16 light vehicles (32 light vehicle movements) associated with employees and visitors.

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

The site will also have a fuel bowser which will hold some 40,000 L and will be a self-bunded, steel unit located in a refuelling area equipped with appropriate environmental controls.

3.2.4 Operating hours and workforce

Approval will be sought to operate up to 24 hours, 7 days per week. The facility will generally accept deliveries (from businesses and the public) and dispatch materials between 6 am and 10 pm Monday to Friday and between 6 am and 5 pm on Saturday. It will also accept deliveries from 7 am to 4 pm on Sunday, providing an additional day on which the general public could deliver recyclable waste to the facility. On occasions, the facility will accept waste deliveries 24 hours per day to allow infrastructure construction and maintenance projects operating at night (eg rail corridor works), to deliver waste as it is generated.

Waste processing will only occur from 7 am to 8 pm Monday to Friday and 7 am to 4 pm on Saturdays. There will be no processing on Sundays or public holidays.

At this stage it is believed that given the separation of the site from residences, these operating hours will not result in unacceptable noise, traffic or lighting impacts. However, this will be considered in detail in the EIS (see Section 4).

The facility is expected to be operated by about ten Benedict Recycling employees.

It is noted that:

- all waste will be handled and stored within enclosed sheds;
- there will be no crushing or shredding on the site; and
- no composting will be allowed on the site.

4 Permissibility and strategic planning

A summary of relevant legislation (including planning instruments) and policies and the development's permissibility is provided in Table 2.

Table 2 Legislation relevant to the development

Legislation/instrument	Relevant section	Comment
<i>Environmental Planning and Assessment Act 1979</i> (EP&A Act)	Section 4.36	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 (or their delegate) is the consent authority.
<i>Protection of the Environment Operations Act 1997</i>	Schedule 1	Proposed activities at the development are listed under Schedule 1 of the POEO Act as 'Resource recovery' activities. Accordingly, an EPL will be required for the site.
State Environmental Planning Policy (SEPP) (State and Regional Development) 2011	Schedule 1 State significant development—general	The development will be SSD pursuant to Schedule 1 of the State and Regional Development SEPP as it constitutes a waste and resource management facility that handles more than 100,000 tonnes per year of waste.
SEPP (Infrastructure) 2007		Waste or resource management facilities may be developed with consent in an IN1 General Industrial zone (see below).
SEPP 33 Hazardous and Offensive Development		SEPP 33 applies to development of potentially hazardous industry. It requires the consent authority to consider whether an industrial development is a potentially hazardous industry or a potentially offensive industry. The EIS will consider if the development will be a potentially hazardous industry.
SEPP 55 Remediation of Land		No significant excavations are proposed. A preliminary investigation is required to identify all past and present potentially contaminating activities; to identify potential contamination types; to describe the site condition; to provide a preliminary assessment of site contamination; and to assess the need for further investigations.
Holroyd LEP	2.1 Land use zones	The site is zoned IN1 General Industrial.
	Land Use Table	The development is permissible with consent in accordance with the IN1 zone and meets the objectives of the zone.
Holroyd Development Control Plan (DCP) 2013	D Industrial Development	The DCP includes detailed development control provisions for all development on industrial zoned land including land zoned IN1 General Industrial at Girraween.
	Built form and design	The DCP includes provisions for building height, design, setback and landscaping. It is envisaged that the development will be designed, including possible alterations of existing buildings, in accordance with the relevant provisions of the DCP.
	Stormwater	Industrial development with a hardstand greater than 1,000 m ² needs to submit a water management plan detailing how water quality strategies will be incorporated in the development design to manage water generated from the site and to consider how any on-site water system will be available for use for non-potable uses. An appropriate on-site water detention system will be described in the EIS, which will include options for water re-use.
	Waste	The DCP requires preparation of a waste management plan when constructing, altering or demolishing a building. Waste generation, classification and disposal will be considered in the EIS.

Table 2 **Legislation relevant to the development**

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

5 Impact identification and assessment

A preliminary review of environmental issues associated with the construction and operation of the development is provided in Table 5.1.

Table 5.1 **Preliminary environmental review**

Aspect	Preliminary environmental review
Soils and contamination	<p>Minor excavation will be required during construction as part of installing surface water controls, for shed footings and for the weighbridges if it is decided to install in-ground bridges.</p> <p>The operational area of the site will be sealed so there will be no opportunity for infiltration of surface water to the underlying soils or groundwater during operations.</p> <p>There are no acid sulfate soils mapped as occurring near the site.</p> <p>The EIS will include a preliminary contamination investigation to identify any past or present potentially contaminating activities, to provide a preliminary assessment of any site contamination and, if required, to provide a basis for a more detailed investigation.</p>
Surface water	<p>All waste/product stockpiling and handling will be within an enclosed shed so rain will not be able to fall on, or percolate through, stockpiles.</p> <p>Water controls at the site will be designed and installed to separate clean and dirty water and to prevent uncontrolled release of water from the site.</p> <p>The site will be sealed and regularly cleaned using a sweeper.</p> <p>The EIS will include a surface water assessment. This will describe the water controls and the efficient use of mains and rain water and arrangements for the discharge of any excess water.</p>
Groundwater	The potential for excavation to intersect groundwater during construction will be assessed in the EIS.
Ecology	<p>The operational area of the site has been previously cleared, filled and levelled (Photograph 2.2).</p> <p>It is not proposed to undertake an ecological assessment of the site as part of the EIS.</p>
Roads and traffic	<p>The site is accessible from Toongabbie Road via Great Western Highway. Both roads are suitable for heavy vehicles.</p> <p>The site will be designed so that there is ample off-street queueing space in front of the in-bound weighbridges.</p> <p>Ample designated parking for employees and visitors will be provided so that so no street parking will be required.</p> <p>The site design will include designated vehicle movement corridors and will separate light vehicles and heavy vehicles as far as practicable.</p> <p>Pedestrian walkways will be demarcated.</p> <p>A full traffic impact assessment will be undertaken as part of the EIS. This will consider average and peak daily vehicle numbers.</p>
Air quality	While there are neighbouring industrial properties, the closest residential receptors are at least 400 m from the site.

Table 5.1 Preliminary environmental review

Aspect	Preliminary environmental review
	<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 will be installed.</p> <p>All waste/product stockpiling, processing and handling will be within an enclosed shed to minimise dust emissions from the site.</p> <p>Misters will be used at shed entrances to minimise dust emissions from the sheds.</p> <p>The site will be regularly cleaned using a sweeper.</p> <p>No crushing will occur on the site.</p> <p>No composting (odour generating) will be allowed on the site.</p> <p>Given that no putrescibles will be accepted and no composting will be allowed to occur, significant odours are not expected to be generated.</p> <p>Dust levels at sensitive receptors will be assessed in the EIS.</p>
Noise	<p>The site is in an existing industrial area and at least 400 m from potential residential noise receivers.</p> <p>All waste/product stockpiling, processing and handling will be within an enclosed shed to minimise noise emissions from the site.</p> <p>There will be no crushing or shredding on the site</p> <p>Noise levels at sensitive receptors will be assessed in the EIS.</p>
Visual and lighting	<p>The site is flat and at a similar level to the surrounding sites.</p> <p>As such, the site will be largely obscured from external viewpoints by landscaping in the site's frontage. The activities will be in keeping with the industrial character and appearance of the area.</p> <p>Potential visual impacts to the streetscape and potential lighting impacts will be assessed in the EIS.</p>
Aboriginal and historic heritage	<p>Given that the site has been cleared and stripped down to firm natural clay and then overlain with 100 mm of Rotamill, it is unlikely that there will be any items of Aboriginal or historic heritage.</p> <p>An Aboriginal Heritage Information Management System (AHIMS) search has been undertaken and there are no Aboriginal sites or places recorded or declared in or near the site. 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> <p>It is not proposed to undertake a detailed Aboriginal or historic heritage assessment as part of the EIS.</p>
Bushfire	<p>The site is not on bushfire prone land.</p>
Hazards	<p>Small amounts of other hazardous materials (eg acetylene for cutting) will also be stored on site. Hazardous waste will not be accepted by the development.</p> <p>The EIS will consider if the development will be a potentially hazardous or offensive development according to SEPP 33 – Hazardous and Offensive Development.</p>
Waste	<p>The site will allow the beneficial reuse of recycled materials.</p> <p>A waste management plan, including an incoming waste quality plan will be prepared prior to the start of operations.</p>

6 Justification

As stated on the Environment Protection Authority website (www.epa.nsw.gov.au/your-environment/recycling-and-reuse/warr-strategy):

Reducing waste generation and keeping materials circulating within the economy are priorities for NSW. To meet this challenge, the NSW Environment Protection Authority (EPA) prepares a new Waste Avoidance and Resource Recovery (WARR) Strategy every five years.

The most recent *NSW Waste and Resource Recovery Strategy (2014–21)* was released in 2014. It describes priority areas over the next seven years and aligns with the NSW Government's waste reforms in *NSW 2021: A Plan to Make NSW Number One*. As stated on the EPA website:

The key areas identified in the strategy will support investment in much-needed infrastructure, encourage innovation and improve recycling behaviour. They will also help develop new markets for recycled materials and reduce litter and illegal dumping.

As an established recycling business in NSW, Benedict Recycling supports these strategies and their ongoing implementation. The development represents “much needed infrastructure” will contribute to meeting the NSW Government’s recycling strategies and targets.

The site is ideally located for the proposed development because:

- it is ideally located in western Sydney to service a number of major urban areas including, Parramatta, Blacktown and Mount Druitt;
- it is readily accessible from major transport links including the Great Western Highway (A44), M4 Motorway, M7 Motorway, and the Cumberland Highway (A28);
- the site is within an existing industrial area surrounded by other compatible developments and land uses;
- the site has sufficient area to allow external manoeuvring of vehicles and also the handling and storage of waste materials within enclosed sheds; and
- 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.

The facility will provide a convenient and cost-effective recycling solution for the area. The facility will service the western Sydney area, which is flagged for an increase in residential, industrial and infrastructure investment, generating demand for waste disposal. The facility will provide an environmentally beneficial means of dealing with non-putrescible general solid waste, with approximately 95% of materials sent on for processing and recovery.

Benedict Recycling’s products are turned into valuable sustainable products and sold back into the industry for use in a variety of applications. Timber, concrete, brick, soil and sand are processed to make recycled soil, aggregate, recycled bedding sand for pipe laying, wood mulch and road base. These products have been utilised in major Sydney projects, including the Barangaroo Development, WestConnex M4 widening, M2 upgrade, NorthConnex, Wet n’ Wild Recreational Park, Sydney Olympic Park and thousands more.

7 Consultation

Benedict Recycling consulted with the site’s neighbours during Benedict’s cleanup of the site. The neighbours were appreciative that the very large waste stockpile that had been on the site for about five years was removed and the site cleaned up, with no dust or noise complaints, as a result of Benedict Recycling purchasing the site and conducting the cleanup.

Benedict Recycling have been discussing the site with the Council for about six months, this has included discussions regarding the previous condition of the site, the site clean-up arranged by Benedict Recycling, the future short-term use of the site for recycling under the current council consent, and the future long-term development of the site that is the subject of this request for SEARs.

Government agencies and neighbours will be consulted during the preparation of the EIS.

8 Capital investment value

An initial estimate indicates that a capital investment of about \$3-\$4 million will be required for in site improvements and about \$1.5 million will be required for mobile plant to be used during operations.

9 Closing

Benedict Recycling are in a position to start construction of the development as soon as the required development approvals are obtained. Should you require any further information, please do not hesitate to contact me on 02 9493 9518, or via email, We would 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 stylized 'P' followed by a long, sweeping horizontal line.

Philip Towler
Associate Director
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