

5 February 2019

Shaun Williams
Department of Planning and Environment
320 Pitt Street
Sydney NSW 2001

**Re: Biodiversity development assessment report waiver
Girraween Waste Recycling Transfer Facility (SSD 9766)
224-232 Toongabbie Road, Girraween**

Dear Mr Williams,

This letter follows the Secretary's Environmental Assessment Requirements (SEARs) for the Girraween Waste Recycling Transfer Facility (the application) at 224-232 Toongabbie Road, Girraween (the site). The application number for the facility is SSD 9766. The project description for the application is provided at Appendix C.

The SEARs for the application require an assessment of biodiversity impacts in accordance with the *Biodiversity Assessment Method* and documented in a Biodiversity Development Assessment Report (BDAR). As detailed below, the site has with minimal biodiversity values and it is considered that a Biodiversity BDAR is not warranted for this site.

EMM has prepared a BDAR waiver request for the application in accordance with the Biodiversity development assessment report waiver determinations for SSD and SSI applications fact sheet, as detailed in Table 1 and Table 2, below. The waiver request has been prepared by a qualified ecologist on behalf of the applicant, Benedict Recycling.

We request that the Department and Office of Environment and Heritage consider waiving the BDAR requirement for the application and would be happy to discuss any questions in relation to this site. Yours sincerely,



Patrick Finnerty
Ecologist



Steven Ward
Associate ecologist

Table 1 **BDAR waiver request information requirements**

ADMIN	<p>1. Proponent name and contact details</p> <ul style="list-style-type: none"> Benedict Recycling Pty Ltd (part of Benedict Industries Pty Ltd). Contact Details – Name: Ernest Dupere, Daytime phone: 02 9986 3500, Mobile: 0407 282 444, Fax: 02 9986 3555, Address: 11 Narrabang Way, Belrose, NSW, 2085 <p>2. Project ID</p> <ul style="list-style-type: none"> Waste recycling and transfer facility, 224–232 Toongabbie Road, Girraween. <p>3. Name / ecological qualifications of person completing TABLE 2</p> <ul style="list-style-type: none"> Patrick Finnerty – Ecologist. Site inspection and preparation of report. Dr Steven Ward – Associate Ecologist, Accredited Assessor (BAAS17062). Quality review.
SITE DETAILS	<p>1. Street address, Lot and DP, local government area</p> <ul style="list-style-type: none"> 224–232 Toongabbie Road, Girraween, Lot 678/DP 9157, LGA – Cumberland Council <p>2. Description of existing development site The site currently consists of:</p> <ul style="list-style-type: none"> 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; 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. <p>Images of the site currently can be found in Appendix B.</p> <p>3. Location map showing the development site in the context of surrounding areas and landscape features. Satellite image of site in context of adjoining sites. See Appendix A.</p> <p>4. Site Map See Appendixes A, C and D.</p>
PROPOSED DEVELOPMENT	<p>1. Project description and Proposed site plan See Appendix C.</p>
IMPACTS ON BIODIVERSITY VALUES	See Table 2.

Table 2 **Impacts of the proposed development on biodiversity values**

Biodiversity value	Meaning	Relevant (✓ or NA)	Explain and document potential impacts including additional impacts prescribed under the BC Regulation Attach additional supporting documentation where appropriate
Vegetation abundance - 1.4(b) BC Regulation	Occurrence and abundance of vegetation at a particular site	✓	<p>Map of current on-site vegetation provided in Appendix D.</p> <p>The majority of the site has been cleared and levelled with a compacted Rotamill base. Little vegetation now exists on site. A thin strip of primarily exotic vegetation is present along the northern, eastern, and southern boundaries of the site bordering the fence line (Appendix B, photographs B.3, B.4, B.5, B.6), and along the northern half of the front of the site adjacent to Toongabbie Road (Appendix B, photographs B.9, B.10).</p> <p>Within the exotic vegetation in the north-west corner of the site, some native tree/shrub species were tagged on site, identified as;</p> <ul style="list-style-type: none"> • Tree 1 – <i>Corymbia maculata</i> (diameter at breast height (DBH) 75 cm) • Tree 2 – <i>Melaleuca ericifolia</i> (DBH 65 cm) • Tree 3 – <i>Melaleuca ericifolia</i> (DBH 60 cm) • Tree 4 – <i>Lophostemon confertus</i> (DBH 35 cm) • Tree 5 – <i>Lophostemon confertus</i> (DBH 17 cm) • Tree 6 – <i>Callistemon sieberi</i> (DBH 15 cm) • Shrub 1 – <i>Melaleuca styphelioides</i> <p>None of the tree or shrubs had identifiable habitat features in the form of hollows or nests. Two large dead stag trees were observed on site which also contained no habitat features (hollows or nests).</p> <p>An inventory of all observed species recorded on site (exotic and native) can be found in Appendix E.</p> <p>All native tree and shrub species that occur on site will be removed for the proposed development.</p>
Vegetation integrity 1.5(2)(a) BC Act	Degree to which the composition, structure and function of vegetation at a particular site and the surrounding landscape has been altered from a near natural state	✓	<p>The integrity of the minimal amounts of vegetation on site is very poor. The site has been cleared and levelled with a compacted Rotamill base. Vegetation borders the boundary of the site and is dominated by exotic species. No habitat features (including hollows, caves, rocks and nests) are present on site. A small pool of stagnant, algal dominated water exists around the weighbridge in the centre of the site. The pool contained a small amount of poor condition, exotic aquatic vegetation.</p>

Table 2 **Impacts of the proposed development on biodiversity values**

Biodiversity value	Meaning	Relevant (✓ or NA)	Explain and document potential impacts including additional impacts prescribed under the BC Regulation Attach additional supporting documentation where appropriate
Habitat suitability 1.5(2)(b) BC Act	Degree to which the habitat needs of threatened species are present at a particular site	NA	No threatened flora were observed during the site inspection, and given the heavily modified nature of the site, none are considered likely to occur. No significant fauna habitat features such as hollows, caves, rocks, or nests were observed on site. One large abandoned two-story building exists in the south-west corner of the site. This building was searched for roosting microchiropteran bats, with none observed, and no signs of presence (eg guano).
Threatened species abundance 1.4(a) BC Regulation	Occurrence and abundance of threatened species or threatened ecological communities, or their habitat, at a particular site	NA	No threatened ecological communities, threatened species, or endangered populations, or their habitat, are considered to be present at the site due to its highly modified state.
Habitat connectivity 1.4(c) BC Regulation	Degree to which a particular site connects different areas of habitat of threatened species to facilitate the movement of those species across their range	NA	Habitat connectivity on site is negligible. The site is within a large industrial estate with no habitat connectivity. No habitat connectivity/corridor potential was recorded in the <i>Blacktown Biodiversity Strategy</i> (Ecological Australia 2011). The site borders a busy road of primarily industrial use which borders Fox Hills Golf Course. This golf course is bordered by industrial and residential estate and offers no habitat connectivity. Any vegetation clearing and development on site will not impact the connectivity of habitat which facilitates the movement of threatened species across their range. The site has minimal vegetation, and is surrounded by industrial lands to the north, east and south, and is bordered by a busy road of primarily industrial use which hold no habitat suitability for threatened species.
Threatened species movement 1.4(d) BC Regulation	Degree to which a particular site contributes to the movement of threatened species to maintain their lifecycle	NA	No threatened species or ecological communities were, or have previously been, observed on site. No habitat features were observed on site (including hollows, caves, rocks and nests). Habitat connectivity on site is negligible, the site is within a large industrial estate with no habitat connectivity. No habitat connectivity/corridor potential was recorded in the <i>Blacktown Biodiversity Strategy</i> (Ecological Australia 2011). The site borders a busy road of primarily industrial use of which borders Fox Hills Golf Course. This golf course is bordered by industrial and residential estate and offers no further habitat connectivity. Any vegetation clearing and development on site will not impact the connectivity of habitat which facilitates the movement of threatened species across their range.
Flight path integrity 1.4(e) BC Regulation	Degree to which the flight paths of protected animals over a particular site are free from interference	NA	The proposed development is largely cleared and will not involve the construction of buildings significantly higher than in the surrounding the industrial area. Therefore, proposed development will not impact on or interfere with flight path integrity of protected animals over the site.

Table 2 **Impacts of the proposed development on biodiversity values**

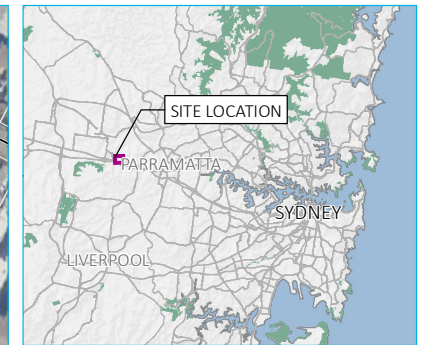
Biodiversity value	Meaning	Relevant (✓ or NA)	Explain and document potential impacts including additional impacts prescribed under the BC Regulation Attach additional supporting documentation where appropriate
Water sustainability 1.4(f) BC Regulation	Degree to which water quality, water bodies and hydrological processes sustain threatened species and threatened ecological communities at a particular site.	NA	The vast majority of the site has been cleared and levelled with a compacted Rotamill base. The site borders no water bodies or hydrological processes. The closest water body (73 m) is the Girraween Creek which runs through the Fox Hills golf course. A small pool of stagnant, algal dominated water (which was the result of rainfall) was observed around the weighbridge in the centre of the site. The pool a small amount of poor condition, exotic aquatic vegetation. Proposed development or operation of the waste recycling and transfer facility will not have any impacts on water sustainability.

Appendix A

Location map and satellite imagery

Plate A.1 Most recent (December 2018) aerial imagery of the site (Source: Nearmap)





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

Site surrounds

Proposed Girraween Recycling and Transfer Facility

Figure 2.1

Appendix B

Current Site Images



Photograph B.1 Looking east to the weighbridge from the entrance of site



Photograph B.2 Looking towards the north boundary of site from the southern boundary



Photograph B.3 **Looking toward the southern boundary wall of the site**



Photograph B.4 **Looking south along the eastern retaining wall**



Photograph B.5 Looking west along the northern boundary of site



Photograph B.6 Exotic plant species (primarily bamboo) overgrowth along the northern boundary of site



Photograph B.7 A partially demolished two storey brick building on the site



Photograph B.8 Looking towards the entry of the site



Photograph B.9 Looking towards the office building at front of site



Photograph B.10 Heavy bamboo growth along the northern boundary of site starting at edge of office building



Photograph B.11 North-west corner of site where several large native trees were observed

Appendix C

Project description

C.1 Project 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.

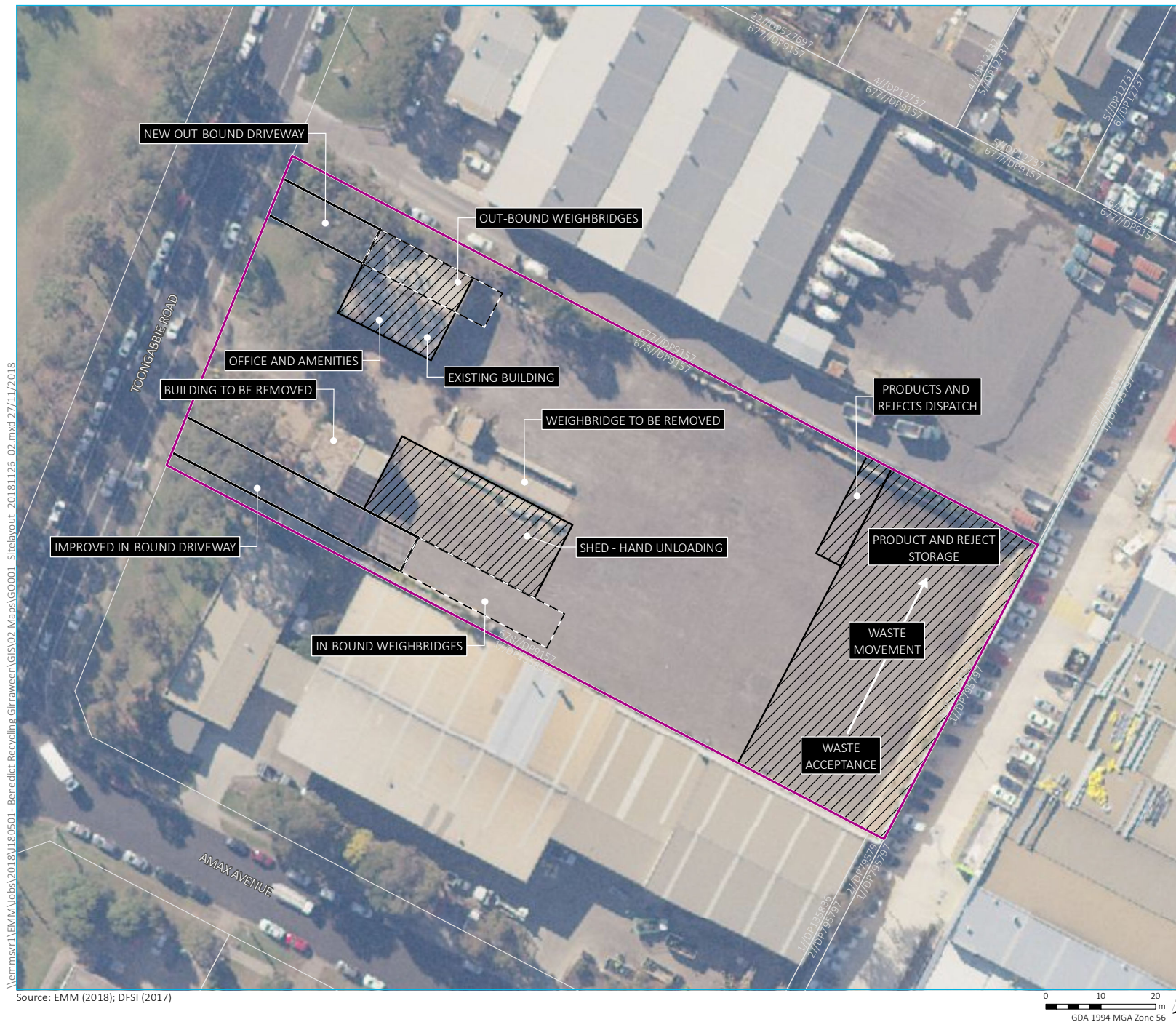
A conceptual site layout is provided in Figure 1.

1.1 Site components

1.1.1 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.

1.2 Operations

1.2.1 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.

1.2.2 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.

1.2.3 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.

1.2.4 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 (e.g. 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.

Appendix D

Map of current on-site vegetation

\\Emmsvr1\emmm\Jobs\2018\180524- Benedict Recycling Facility Girraween\GIS\Q2 Maps\ECO001_SiteVegetation_20190125_03.mxd 25/01/2019



- KEY
- Subject site
 - Shrub
 - Tree
 - Non-native vegetation
 - Cadastral boundary

Current onsite vegetation

Proposed Girraween Recycling and Transfer Facility

Figure 2.6

Appendix E

Plant species inventory

E.1 Plant species inventory

Origin	CODE
Native species	N
Exotic species	E
Noxious species	+

Table 3 Plant species inventory

Species name	Common name	Origin
<i>Ageratina adenophora</i>	Crofton weed	E
<i>Bidens pilosa</i>	Cobbler's peg	E
<i>Callistemon sieberi</i>	River Bottlebrush	N
<i>Carduus nutans</i>	Nodding thistle	E
<i>Conyza sumatrensis</i>	Tall fleabane	E
<i>Corymbia maculata</i>	Spotted gum	N
<i>Cyperus eragrostis</i>	Tall flatsedge	E
<i>Ipomoea purpurea</i>	Morning glory	E
<i>Ligustrum lucidum</i>	Large leaved privet	E
<i>Lophostemon confertus</i>	Brush box	N
<i>Melaleuca ericifolia</i>	Swamp paperbark	N
<i>Melaleuca styphelioides</i>	Prickly-leaved paperbark	N
<i>Paspalum dilatatum</i>	Dallis grass	E
<i>Rhizomatous bamboo</i>	Bamboo	E
<i>Ricinus communis</i>	Castor oil plant	E
<i>Senecio madagascariensis</i>	Fireweed	E+
<i>Sida rhombifolia</i>	Paddy's Lucerne	E
<i>Sonchus oleraceus</i>	Common sowthistle	E
<i>Typha domingensis</i>	Cumbungi	E
<i>Verbena brasiliensis</i>	Brazilian vervain	E