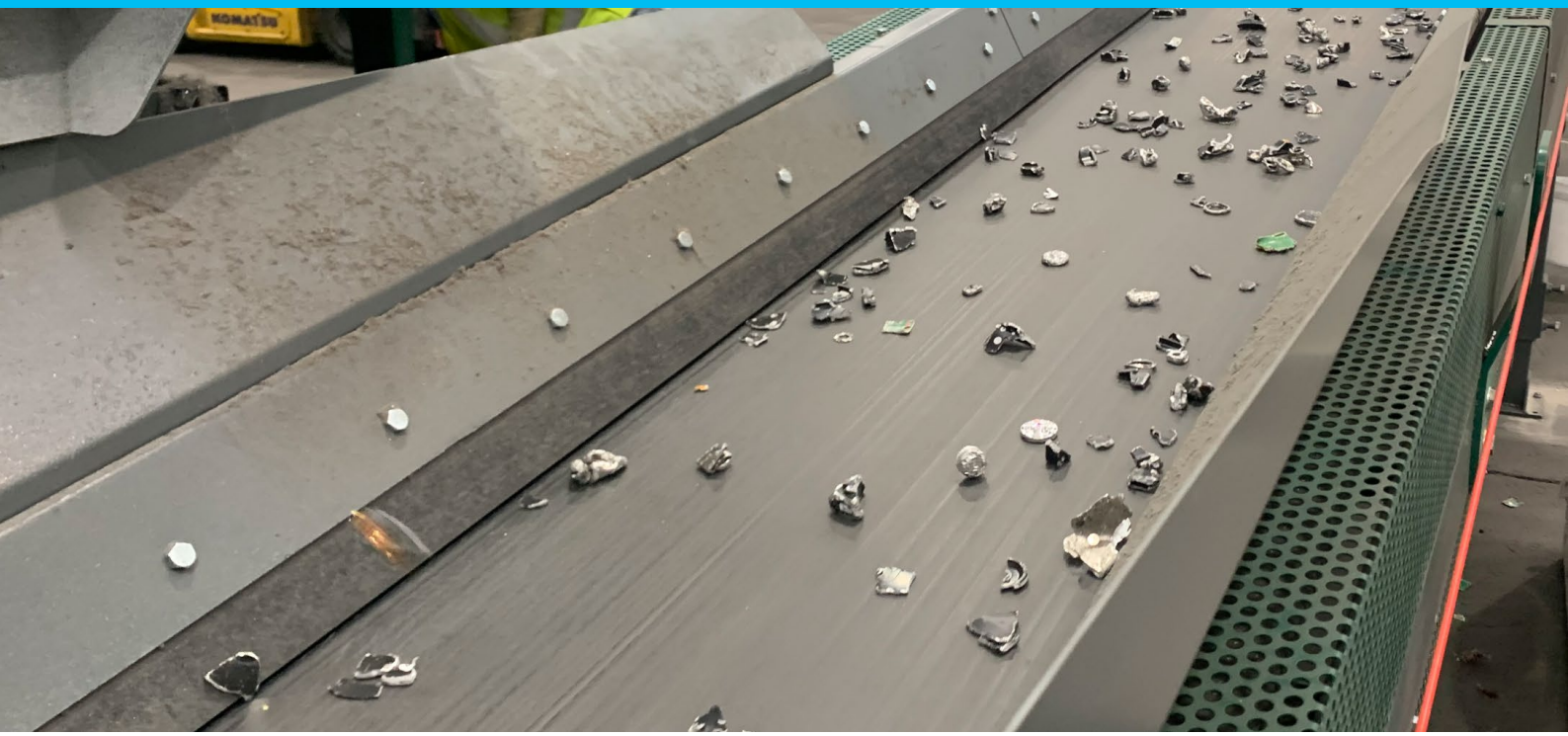
Statement of Environmental Effects – 90 Marple Ave, Villawood DA Modification

A Submission to City of Canterbury – Bankstown Council on behalf of Sircel Recycling Pty Ltd

25 January 2023



MRA Consulting Group

Statement of Environmental Effects – 82 - 90 Marple Ave, Villawood DA Modification

A Submission to the City of Canterbury Bankstown Council on behalf of Sircel Recycling Pty Ltd

Prepared by

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Disclaimer

In the spirit of reconciliation MRA Consulting Group acknowledges the Traditional Custodians of country throughout Australia and their connection to land, sea and community. We pay our respects to Aboriginal and Torres Strait Islander peoples and to Elders past, present and emerging.

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Glossary

Terminology	Definition
ASS	Acid Sulfate Soils
BCA	Building Code of Australia
DA	Development Application
DCP	Development Control Plan
Electrowinning	The process of electrowinning passes an electric current through an aqueous solution of metal ions, depositing metal on a cathode in an electroplating process.
Electrorefining	The process of refining of a metal (such as copper) by electrolysis, the crude metal used as the anode going into solution and the pure metal being deposited upon the cathode.
E-waste or WEEE	Waste from electrical or electronic equipment
EPL	Environment Protection Licence
EPA	Environmental Protection Authority (NSW)
EP&A Act	Environmental Planning and Assessment Act 1979
EP&A Regulation	Environmental Planning and Assessment Regulation 2021
FTE	Full Time Equivalent
GHS	Globally Harmonised System
IBC	Intermediate Bulk Container
IN1	IN1 – General Industrial Zone
LEP	Local Environmental Plan
LGA	Local Government Area
MRA	Mike Ritchie and Associates Pty Ltd (t/a MRA Consulting Group)
SEE	Statement of Environmental Effects
SEPP	State Environmental Planning Policy
PoEO Act	Protection of the Environment Operations Act 1997
PoEO Regulation	Protection of the Environment Operations (Waste) Regulation 2014
tpa	Tonnes per annum
WHS	Workplace Health and Safety

Executive Summary

Introduction

The proponent (Sircel Recycling) seeks consent for a Section 4.55(2) modification pursuant to the *Environmental Planning and Assessment Act 1979* (EP&A Act), to modify the development consent at Lot 1 DP869968 in the Canterbury-Bankstown Local Government Area (LGA), known as 90 Marple Ave, Villawood (the Site).

Proposal

The modification proposes to amend the consent in the following manner:

- To include additional technology and equipment at the site to carry out an 'electrowinning' process. The electrowinning circuit will further refine outputs from the mechanical sorting and shredding equipment. The circuit will extract copper from the e-waste concentrate and will provide a residual output for further refining at another site operated by Sircel.
- A variation of the hours of operation of the facility to the following:
    - Monday to Friday, inclusive: 6am – 10pm (operation and deliveries)
    - Saturday 7am to 3pm (operation), Saturday 7am to 6pm (deliveries)
    - Sunday 10am to 6pm (deliveries only)
    - It is also requested that maintenance activities be carried out within proposed delivery hours (no plant operation)
- An update of the existing approved signage at the site to reflect the new operator.
- A variation of the overall carparking provision at the site to reflect the needs of the development.

Operational Need

Opportunities that arise from this proposal include value-add to outputs by the further refinement of materials and maximising the resource recovery of these hard-to-recycle materials. The proposal will assist governments to achieve their objectives for the recovery and recycling of e-waste, and meet circular economy objectives as detailed in the NSW Waste and Sustainable Materials Strategy 2041 and the National Waste Policy (2018)

Current Consent

The Site has consent under DA-468/2008 for the *'use of premises for the recycling of Electrical and Electronic consumer goods (E-Recycling facility) to be conducted within an existing industrial building.'* The proposed modification to the consent is consistent with the description of the consented use and is therefore considered to be substantially the same development to that which was approved at the site under the original consent.

Planning Context

This application is for a Modification to the consent condition under section 4.55 (2) of the EP&A Act, being for a modification with minimal environmental impact that is substantially the same as the original development.

The site requires a licence from the NSW EPA for the storage and processing of more than 6,000 tpa of waste, therefore any modification application requires referral to the NSW EPA. Sircel is currently in the process of obtaining a licence for the site in accordance with the existing development consent that allows for a throughput of 20,000 tpa.

Environmental Assessment Summary

The following environmental aspects are affected by this proposal:

<u>Noise</u>

Noise generation from the site is not expected to disturb receivers and is consistent with project noise trigger levels. It is therefore concluded that this proposal would not pose undue noise effects on the nearest residents.

<u>Traffic</u>

It is expected truck movements will slightly increase because of the proposed extended trading at the site. Existing conditions limit truck routes, which will not pass through residential areas and will therefore have limited affect during evening operations.

Air quality

The input materials are inert and non-putrescible and therefore would not generate offensive odours. Processing operations are undertaken inside of the building, which minimises risk of emissions of dust to the environment. Additional mitigation measures would be adopted to ensure air emissions are managed appropriately at the site.

Soils and Water

Stormwater runoff will be managed to avoid impacts to the environment. No leachate would enter stormwater or groundwater.

Conclusions and Recommendation

Overall, the proposal to add an additional process and to extend operating hours remains consistent with the current consent. The additional equipment would complement existing sorting and separation activities undertaken at the site. The process line and increase in operational hours would not generate any significant environmental impacts.

All changes are permissible within the legislative framework.

1 Introduction

This report has been prepared as a Statement of Environmental Effects (SEE) on behalf of Sircel Recycling Pty Ltd, t/a Sircel Recycling (the Proponent). The Proponent is seeking approval for a Section 4.55(2) modification of the existing consent **DA-468/2008 (as amended)** which relates to the E-Recycling facility at 90 Marple Ave, Villawood in NSW (the Site). The Site is located within the City of Canterbury-Bankstown Council LGA. The legal description of the site is Lot 1 DP869968 in the Canterbury-Bankstown Local Environmental Plan (CBLEP) 2023.

Sircel Recycling has assumed the operation of the site from previous owners SIMS E-Recycling. It is proposed to modify approved operations by extending operating hours and installing new technology for the separation of precious metals.

The application seeks consent to modify the existing consent under Section 4.55(2) of the Environmental Planning and Assessment Act 1979.The amendments to the consent would result in development which is considered to be substantially the same as was approved under DA-468/2008 (as amended).

1.1 Proposal Overview and Background

On 22 September 2008, DA-468/2008 granted consent for the '*use of the premises for the recycling of electrical and electronic consumer goods (e-recycling facility) at 90 Marple Ave, Villawood'*. The consent approved a maximum operating capacity of 20,000 tonnes per annum (tpa) or 2,500 tonnes onsite at any one time. It also approved operation hours between 7am and 6pm on weekdays.

On 28 August 2013, this consent was amended by a Section 96(1A) modification application (now known as a Section 4.55(1A) modification) to include a portable shredder (DA 468/2008/1).

This application seeks to modify the consent under Section 4.55(2) of the EP&A Act, to:

- Include additional technology and equipment at the site to carry out an 'electrowinning' process to further refine and separate materials (process up to 60t/month ground e-waste concentrate);
- Vary the hours of operation of the facility to allow opening hours of:
    - Monday to Friday, inclusive: 6am – 10pm (operation and deliveries)
    - Saturday 7am to 3pm (operation), Saturday 7am to 6pm (deliveries)
    - Sunday 10am to 6pm (deliveries only)
    - It is also requested that maintenance activities be carried out within proposed delivery hours (no plant operation);
- Update of the existing signage at the site to reflect the new owner-operator; and
- Vary the overall carparking provision at the site to reflect the needs of the facility.

The Proponent seeks to include new electrowinning technology at the site to expand the capabilities for e-waste processing and metal separation. The electrowinning activity enables the separation of valuable metals via a chemical process from mixed metal fraction (e-waste concentrate), for sale back into the market. This technology would complement the existing sorting and separating activities that occur onsite.

Recovered metals are a targeted material for remanufacture within a circular economy. Precious metals are sought after commodities and can have a range of commercial uses. Sircel Recycling seeks to expand their operations at the existing site to continue to support the reuse of precious metals and materials from e-waste, which are ordinarily destined for landfill.

1.2 Strategic Project Need

The proposed development engages with the principles of circular economy by reprocessing metals that have been extracted from discarded electronic goods. As NSW shifts from a linear - make, use, dispose model, to a circular-reuse and recycle model, additional processing infrastructure is needed to manufacture goods from recycled inputs.

Sircel Recycling provides a safe and sustainable solution for the processing of a concentrate for separation into useable production inputs. Sircel Recycling's metals processing supports the safe extraction of materials for reuse back into the economy, supporting a circular economy approach.

1.2.1 City of Canterbury-Bankstown's Community Strategic Plan – CBCity 2036

The City of Canterbury Bankstown Council has developed the 'CBCity 2036' Community Strategic Plan which outlines seven key directions for the LGA, and pathways to achieving those key objectives. Relevant objectives are referred to as 'destinations'. 'Clean & Green' is a key destination, and includes a pathway of 'cleaning the city using advanced recycling and waste services.' Measures of success in achieving this directive include 'percentage waste to landfill is reduced' and 'recycle/reuse facility established.' The subject application supports these objectives and actively contributes to the reuse and recycling of materials, by accepting ewaste materials from the LGA. The modifications proposed would help to continue the organisations contribution to the broader goals for the council area.

1.2.2 City of Canterbury-Bankstown's Economic Development Strategy Plan 2036

The City of Canterbury-Bankstown Council has developed an *Economic Development Strategy* as a supporting plan to guide the 'Prosperous & Innovative' destination described in the *CBCity 2036 - Community Strategic Plan*. The Council has a role in supporting the economic development of the LGA, and identifies the need to foster economic development, advocate for business and the community, as well as using planning approvals, zonings and regulations to guide the economic environment of the area.

The proposal is consistent with the Strategy in that it provides a unique and sustainable business activity and will support employment opportunities within the LGA.

1.2.3 Protection of Environment Operations Act 1997

The NSW waste regulatory framework is established under the state's principal legislation, the *Protection of the Environment Operations* (PoEO) *Act*. The key objective is to ensure a healthy and clean environment by regulating pollution and other adverse environmental impacts that may result from waste activities. Waste regulation uses tools and programs to mitigate pollution from waste disposal, minimise resource use, improve resource recovery and ensure the appropriate disposal of harmful waste in NSW.

The NSW EPA maintains the integrity of the NSW waste regulatory framework by actively working on enforcement, education and compliance programs to promote resource recovery and combat illegal dumping and inappropriate disposal of waste. A fundamental feature of the regulatory framework is the licensing of waste activities to ensure that appropriate controls are in place to regulate waste disposal and other waste management activities.

The proposed activities are subject to regulation under the PoEO Act.

1.2.4 Protection of the Environment Operations (Waste) Regulation 2014

The *Protection of the Environment Operations (Waste) Regulation 2014* provides the implementation framework for the *Protection of the Environment Operations Act, 1997*, as it relates to waste. The regulation contains provisions for contributions by scheduled waste facility operators. It outlines the requirements for reporting and record-keeping, transport of waste interstate, asbestos and recycling of packaging. It provides for the EPA to issue exemptions to the Act and it outlines offenses relating to waste.

A licensed facility is required to comply with the obligations for reporting within the Regulation.

1.2.5 Waste Avoidance Resource Recovery (WARR) Act 2001

The WARR Act aims to encourage the efficient use of resources and reduce environmental harm in accordance with the principles of ecologically sustainable development. The WARR Act serves the following functions:

- Promotes waste avoidance and resource recovery;
- Provides for the development of the WARR Strategy;
- Defines the functions of the EPA;
- Establishes a scheme to promote extended producer responsibility in place of industry waste reduction plans; and
- Establishes a Container Deposit Scheme to promote reuse and recovery within the beverage industry.

1.2.6 NSW Waste and Sustainable Materials Strategy 2041

The *NSW Waste and Sustainable Materials Strategy 2041* (NSW WSM Strategy) outlines a number of targets to assist the transition to a circular economy, which aims to eliminate waste and reduce the continual use of new resources. Circular systems employ reuse, share, repair, refurbishment, remanufacturing and recycling to use resources efficiently and minimise the creation of waste, pollution, and carbon emissions.

A focus of the document includes the investment into infrastructure, services and innovation to support a circular economy.

Three focus areas of the strategy include:

- Meeting our future infrastructure and service needs
- Reducing carbon emissions through better waste and materials management
- Building on our work to protect the environment and human health from waste pollution.

The document outlines a future need for new industry for downstream processing of metal fractions. The proposal is consistent with the NSW WSM Strategy in that it seeks to provide an activity that processes metal fractions for reuse.

1.3 Operational Project Need

The operational need for the proposed activities is prescribed by:

- Sircel Recycling needs to provide additional processing capacity for the processing of e-waste materials for recycling;
- Further processing being consistent with Circular Economy objectives to recover 100% of materials throughout;
- An increase in market availability of the primary materials such as recovered metals;
- The Site having an existing consent for e-waste processing, is already operating and has been designed to accommodate increases in throughput. Increasing the processing capacity of the existing facility is more desirable than the establishment of a new facility;
- The facility continuing to meet the immediate need for management of LGA and the Sydney region's problem waste streams.

1.4 Assets and Utilities

A Dial Before You Dig search was undertaken to determine the locations of utility infrastructure.

The Site has the flowing assets in the vicinity:

- Sydney Water reticulated water;
- Sewer;
- Telstra Telecommunications and Optic fibre
- Ausgrid assets/cables.
- Jemena high pressure gas main underground along the eastern side of the road at Marple Ave.

Upgrades to buildings and hydrants would be undertaken so as to avoid impact to fixed assets .

1.5 Capital Investment

The cost of developing the site is estimated at $940,000.

Table 1: Capital Investment Value

Item	Estimate ($)
Plant & Equipment Cost	$ 840,000.00

Item	Estimate ($)
Installation (basic standup)	$ 100,000.00
TOTAL	**$ 940,000.00**

A quantity surveyors (QS) report is included in the submission package to support the application.

2 Site Description

2.1 Site Location and Context

The Site is situated within the Canterbury-Bankstown Local Government Area (LGA) in the suburb of Villawood in NSW. Villawood is located 22 kilometres west of the Sydney CBD and is part of the Greater Western Sydney region.

The legal description of the Site is Lot 1 DP869968 in the Canterbury-Bankstown Local Environmental Plan (CBLEP) 2023. The site address is 90 Marple Avenue, Villawood, NSW.

The Site is located along the southern edge of Villawood's zoned IN1 industrial park. The industrial zoned land is around 180 ha in size and the north and south of the precinct is divided by the T3 Bankstown railway line. Villawood Detention Centre is located to the north of the industrial zone. Chester Hill town centre and train station is located to the north-east of the site, Leightonfield Station to the north and Villawood town centre and train station is located to the north-west. Residences are located approximately 30m south of the site on the opposite side of Biloela Street. The site location and surrounds are shown below in Figure 1.

Figure 1: Subject site and surrounding area

Source: Nearmap, 2023

2.2 Existing Site Infrastructure

The total land size is approximately 1.53 hectares. Built infrastructure consists of a warehouse (6,277m^2) with awning, mezzanine (288m^2) and two-storey interconnected office (approx. 1,597m^2). The office and staff breakout area are located towards the south-east of the site, behind the parking area. A large split-level hardstand area at the front of the site provides access and parking for vehicles to the facility.

Two driveways are provided from Marple Avenue to the east. A driveway at the southern end of the site provides access to a contained and raised staff and visitor parking area. The northern driveway is the primary access for trucks and vehicles for deliveries and offtake. The site is designed such that the raised carparking area and landscaping to the east and south shield sightlines to the facility from the street and public areas.

Figure 2: Aerial view of the site

Source: Nearmap, 2023

2.3 Surrounding Uses

The Site is located at the edge of an Industrial precinct in Villawood, surrounded by general industrial uses and large-format industrial and warehouse buildings to the north, east and west. The precinct is characterised by warehousing and manufacturing uses.

Single detached residential dwellings are located to the south of the site, along Biloela St.

2.3.1 Sensitive Receivers

The closest residential dwellings are located to the south of the site along Biloela Street. Figure 3 & Figure 4 depict number 95 (red brick dwelling), number 97 (behind sold sign, figure 4) and dwellings nos. 99 – 107 Biloela St.

The residential dwellings are separated from the site by Biloela Street and a section of RE1 – Public Recreation zoned land on the northern side of the roadway. This section is characterised by a vegetated area.

Figure 3: View from corner Marple Ave & Biloela St, facing southwest

Figure 4: View from Biloela St, facing southwest

Figure 3: View from cnr Marple Ave & Biloela St, facing southeast

Figure 4: View from cnr Marple Ave & Biloela St, facing east

Figure 5: View back into 90 Marple Ave, from cnr Biloela St

3 Planning Constraints

3.1 Land Use Zoning

The Site has the legal description of Lot 1 DP 869968 in the Canterbury-Bankstown Local Environmental Plan 2023 (CBLEP). The Site is zoned IN1 – General Industrial (Figure 6).

Objectives for the zone include:

- *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 promote a high standard of urban design and local amenity.*

The development would continue to meet the objectives of the IN1 land use zoning as a result of this modification.

Figure 6: Site Land Use Zoning

Source :NSW Govt ePlanning Spatial Viewer, 2023

3.2 Acid Sulfate Soils

Council's Acid Sulfate Soil Mapping indicate the Site is not situated on land affected by acid sulfate soils (Figure 7).

The nearest land affected by acid sulfate soils is over 750 meters to the south-west of the site, and is categorised as Class 5 acid sulfate soils. Further, the development does not involve excavation or the disturbance of soil, nor will it result in the lowering of the watertable. The works are not expected to disturb, expose or drain acid sulfate soils.

Figure 7: Acid Sulfate Soils Map

Source :NSW Govt ePlanning Spatial Viewer, 2023

3.3 Bushfire Prone Land

The site is not located on bushfire prone land.

The nearest bushfire prone land is located around 600 metres to the south-west of the site. This area is comprised of vegetation buffer and further south vegetation category 1.

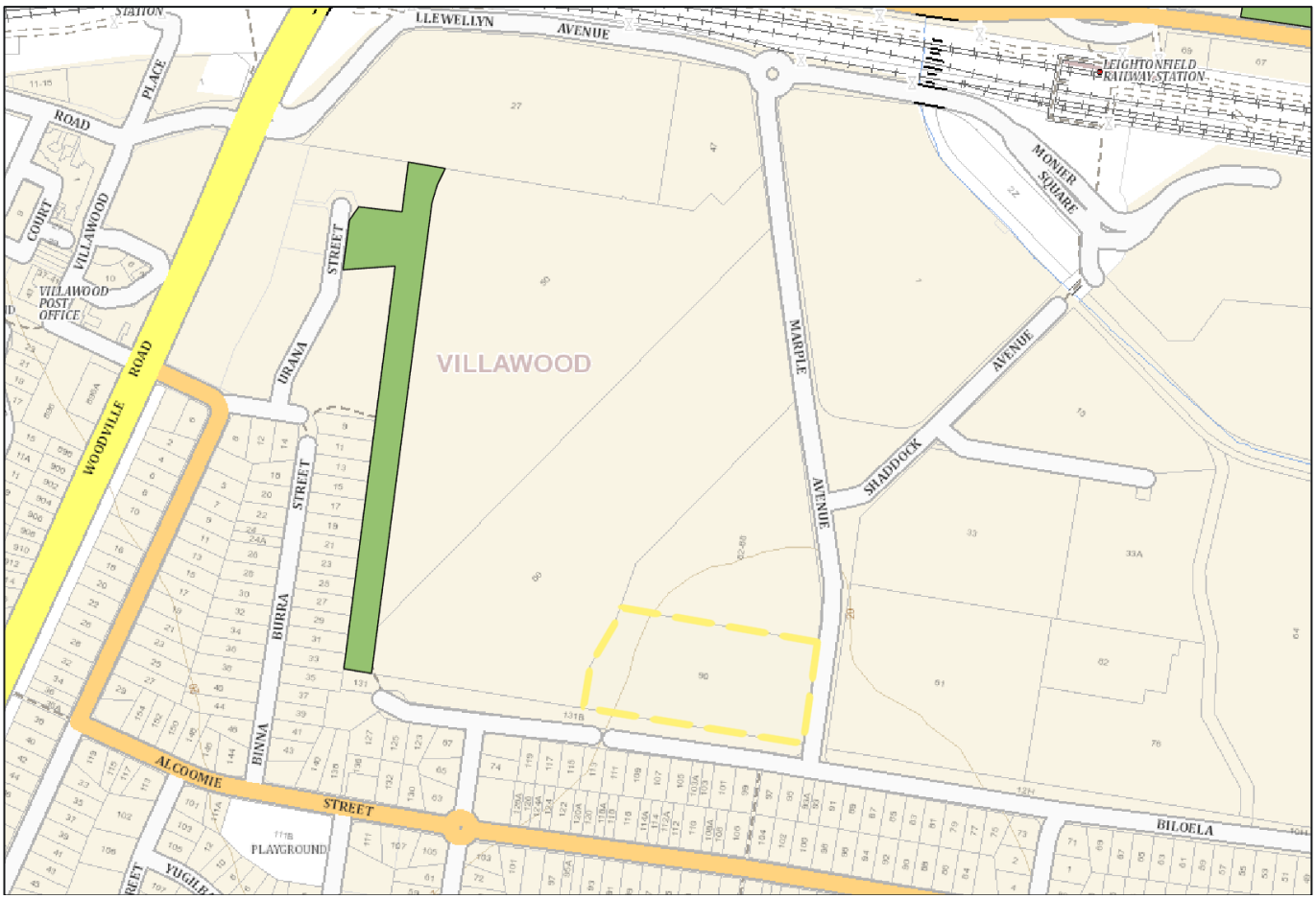
Figure 8: Bushfire Mapping

Source :NSW Govt ePlanning Spatial Viewer, 2023

3.4 Terrestrial Biodiversity

The site is not mapped as having biodiversity values. The nearest mapped area containing biodiversity values is located around 200 metres to the west of the site, and is separated from the site by other industrial uses. This narrow strip of biodiversity corridor is not considered to be significantly impacted by the proposed modifications to the site.

Figure 9: Terrestrial Biodiversity Map



Source: Terrestrial Biodiversity Sheet Map, BLEP 2015

3.5 Other Investigations

The site is not located on flood prone land.

The site is not affected by listed heritage places or items.

The site is not subject to drinking water catchments.

4 Detailed Description of Proposed Works

4.1 Physical Works

4.1.1 Construction Works

The proposed development will utilise the existing building for processing operations.

New construction/fit-out works would consist of:

- Installation of weighbridge (already completed)
- Installation of 'electrowinning' equipment and machinery internally, comprising:
    - Reactor tanks
    - Storage tanks
    - Electrowinning cells
    - Racking
    - Vacuum scrubber system
    - Transfer pumps
    - Fixed lines
    - Bunding for each reactor and liquor storage vessel
    - Upgrading of power supply
- Installation of a new QC laboratory internally, including:
    - ICP
    - Dosimats
    - Microwave digestion benchtop unit
    - Drying oven
    - Portable vacuum pump
    - Fume hood
    - Cabinetry
    - DI water system
    - Safety shower
    - Drying rack
    - Hot plates
    - General lab equipment
- Updates to existing business identification and wayfinding signage external to the building.

4.1.2 Signage

Alterations to signage is proposed as part of this application. Where possible, signage will utilise existing signage structures and update logo/content only. The following amendments to signage are required:

- Update content of approved pylon sign to Sircel Recycling's business logo;
- Update content of the existing front gate directional signage structure; and
- Replacement and relocation of an existing directional sign indicating 'visitor and staff carpark' to the front fence.

Signage is described in detail under Section 5.5.7.

4.2 Changes to Approved Operations

The application seeks to install additional equipment for further refinement of the mixed metal fraction (e-waste concentrate). The overall site operations are detailed below. The Site has approval for the processing of materials using mechanical size reduction equipment to separate ferrous and non-ferrous metals.

4.2.1 Staffing

A total of 25 operational staff will be present at the site, inclusive of 6-8 office staff.

4.2.2 Hours of Operation

Existing approved hours of operation are between 7am and 6pm on weekdays.

This application seeks to extend hours of operation to the following:

- Monday to Friday, inclusive: 6am – 10pm (operation and deliveries)
- Saturday 7am to 3pm (operation), Saturday 7am to 6pm (deliveries)
- Sunday 10am to 6pm (deliveries only)

It is also requested that maintenance activities be carried out within proposed delivery hours. No plant operation will occur during hours set aside for deliveries only.

Truck access to the site is limited to through the industrial area only, and not permitted along residential roads.

4.2.3 Car parking

This application also seeks to reduce the amount of carparking at the site from 76 car parking spaces to 58 car parking spaces.

4.2.4 Processing Description

The existing process is captured under stages 1 to 4, below. Further resource recovery is proposed by electrowinning as described in Stage 5.

Stage 1:Site Access via Inbound Weighbridge

Council or commercial waste collection vehicles enter the site, and materials are weighted via weighbridge or pallet scales, details of material will be recorded and dockets retained.

Non-confirming loads to be identified and rejected at this point and sent to appropriate disposal facility.

Empty trucks proceed to exit.

Stage 2: Acceptance of material and pre sort

Materials arrive onsite on pallets, cages, or bulk bins within the materials receival area. No materials are tipped directly to warehouse floor.

Material is triaged and any high values or battery container devices are removed prior to shredding.

Oversized items (such as TVs) are separated and dismantled.

Refrigerators are degassed and certified before being processed.

Computers and mobile phones which are able to be repurposed are transported to a separate area for data destruction. Electronics are ‘wiped’ of data, fixed and certified, before being sold or donated to public community programs.

Stage 3: Existing Processing

Waste electronic and electrical goods are transferred from the material stockpile to the shredder hopper via a forklift.

Material is pre-shredded before being is deposited to a stockpile and transferred to the hammer mill loading hopper.

Material is subsequently processed via a series of hammer mills, magnetic rollers and size reduction equipment to separate ferrous and non-ferrous materials.

Output materials are further sorted , into copper, brass, aluminium, plastic, steel and mixed precious metals (ground e-waste concentrate).

Stage 4: Storage of outputs

Output materials are stored inside the warehouse until transportation offsite for further processing or sold to market. Products from the various processes will be stored on the pallet racks close to the office block. It is possible that some overflow packaged products may be stored externally from time to time in the event that the pallet rack is at capacity. Any materials temporarily stored outside will be covered and stored under the large awning, out of the weather on the hardstand area.

Stage 5: Proposed Chemical Processing (digestion/neutralisation/electrowinning)

The ground e-waste concentrate (mixed metal fraction) undertakes a further refining process via the following process:

a) Loading of mixed metal fraction by utilising a forklift to lift the bulker bags onto a hopper and screw fed into the circuit under dust extraction.

b) The mixed metal fraction passes through a number of reactor tanks (circuits) to separate and remove metals with the addition of acids or bases.

c) Addition will be undertaken by pumping directly out of large, sealed containers (IBC's) through fixed lines into the reactors.

d) Liquids from the process are neutralised with lime, which will be manually transferred into slurry tanks under dust extraction. The lime is used to neutralise, generates a gypsum waste solid. At current this waste solid is in negotiation to be taken by an offtaker but should be considered in the worst case as a waste product The metal removed from this process is predominantly Copper (Cu). Leftover material from the process (e-waste concentrate) will be sent for further metallurgical separation/processing at Sircel Recycling's approved facility. Wastewater containing impurities from the process will be removed by licenced waste service provider Cleanaway (no liquid waste water will be discharged to sewer).

4.3 Storage of Product

4.3.1 Storage of Incoming Materials

All processing occurs indoors within the building footprint. Storage of product is primarily within the building. Select materials upon delivery are temporarily stored covered and protected from weather under the building's large front awning on concrete hardstand.

Skips will be provided near to the site entrance front roller door, one each for large steel items and general residual waste materials.

Items contaminated with batteries will be dismantled and batteries removed immediately. Storage for batteries is kept external to the building at the northern boundary, away from equipment and incompatible materials, in a purpose-built, fireproof container.

Bulk acids and bases will be received and stored in IBC's, on bunded pallets. Bulk acid would remain in bunded IBC's and small volume acids (hydrochloric and nitric) to be stored in Globally Harmonised System (GHS) compliant acid storage cabinets in the laboratory.

4.3.2 Hazardous Material Storage

Storage and handling of hazardous materials would be in accordance with GHS compliance. The GHS is a system used to classify and communicate chemical hazards using internationally consistent terms and information on chemical labels and Safety Data Sheets[1].

[1] As defined in Safe Work Australia's GHS information sheet accessed at *https://www.safeworkaustralia.gov.au/system/files/documents/1702/ghs-information-sheet-23052016.pdf*

Electrowinning reactor tanks, circuits and liquor storage vessels will be bunded. Acids will be stored in bunded IBCs. The lab will also be bunded.

Acids and bases will be stored separately to avoid mixing of incompatible materials, with polypropylene covers and hard plumbed into process circuits to avoid manual handling. Smaller volumes of acids and bases will be stored in appropriate cabinetry (such as in the lab).

Dry chemicals will be stored separately from liquids. Battery storage is external to the building in a large fireproof container that is designed for battery storage.

4.3.3 Storage of Processed/Outgoing Materials

The product from the various processes will be stored on the pallet rack close to the office block. The various products will be fully sealed and stored on 1400 mm pallets for ease of handling.

4.4 Product Destination

Outputs from the process will be transported to local manufacturers, and where local markets are not established, the materials will be transported internationally.

It is expected the materials will be transported to a local buyers or overseas where local markets are not established. Residual wastes will be taken to a licenced disposal or transfer facility.

5 Planning Context and Considerations

5.1 Existing Approvals & Relevant Application History

The following consents have been granted in relation to the site:

- **DA-468/2008 (as amended)** - On 22 September 2008, the former Bankstown City Council granted consent for the *proposed use of premises for the recycling of Electrical and Electronic consumer goods (E-Recycling facility) to be conducted within an existing industrial building.* Conditions of this consent approve a maximum operating capacity of up to 20,000 tpa or 2,500 tonnes onsite at any one time.

  This application was subsequently modified under Section 96(1A) of the *Environmental Planning and Assessment Act 1979* (DA-468/2008/1) to include a portable shredder.

- **DA-237/2004** - On 7 June 2004, the former Bankstown City Council granted consent for the *installation of a new pylon business sign* related to the premises.

- **CF021034CD01** – On 26 April 2002 a Complying Development Certificate (CDC) was issued for the conversion of Automatic Fire Alarm monitoring system from connection with the NSW FB to Romteck Grid Pty Ltd – AFASP (Automatic Fire Alarm Service Provider) contracted to the NSW Fire Brigades. Automatic Signalling Equipment installed inside the building.

- **D1034/1997 (as amended)** -On 16 December 1997 a building permit was approved for the erection of a warehouse building for wine storage and distribution and ancillary offices.

  This application was subsequently modified under Section 96(2) of the Environmental Planning and Assessment Act 1979 (DA-468/2008/1) to vary the approved hours of operation.

- **DA-732/1996** – On 23 December 1996 consent was granted for the subdivision of land into two (2) allotments.

5.2 Section 4.55(2) Modification

This application seeks consent to modify the existing approval under Section 4.55(2) of the *Environmental Planning and Assessment Act 1979*.The amendments to the consent would result in development which is considered to be substantially the same as was approved under DA-468/2008. The amendments are considered to require notification, and therefore would not be categorised as a Section 4.55 (1) or Section 4.55 (1A), which relate to *minor error, misdescription or miscalculation* or modifications involving *minimal environmental impact*.

5.3 Licencing

Schedule 1 of the *Protection of the Environment Operations Act 1997* provides thresholds for activities that require licensing.

The site's previous operator Sim E-Recycling Pty Limited, held an Environment Protection Licence (EPL 20649) at the site for:

- Recovery of general waste;
- Waste storage – hazardous, restricted solid, liquid, clinical and related waste and asbestos waste; and
- Waste storage – other types of waste.

A new licence is being sought concurrently to this development application from the NSW EPA.

5.4 Local Planning Legislation

The City of Canterbury and the City of Bankstown Council merged to form the City of Canterbury-Bankstown in 2016. The consolidated LEP and DCP are now in force. The relevant LEP and DCP for the site are:

- The Canterbury-Bankstown Local Environmental Plan 2023 (CBLEP); and
- The Canterbury-Bankstown Development Control Plan 2023 (CBDCP).

5.4.1 Canterbury Bankstown Local Environmental Plan 2023 (CBLEP)

The legal description of the site is Lot 1 DP 869968. The Site is subject to IN1 – General Industrial zoning (CBLEP 2023). The lot is located within the City of Canterbury- Bankstown LGA.

Other zones in the vicinity include RE1 – Public Recreation, R2 – Low Density Residential and R3 – Medium Density Residential.

The IN1 – General Industrial zone has the following objectives:

- 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 achieve a high standard of urban design and local amenity.

Table 1 outlines the development standards that apply to the site. The requirements of the CBLEP is addressed in the response column.

Table 2: Canterbury- Bankstown LEP 2023 compliance table

Development clause	Development standard criteria	Response
Clause 2.1 - Land Use Zones	IN1 – General Industrial Zone (see objectives described above)	General industries are permitted with consent within the zone. The proposed facility is existing and remains consistent with the first and second objectives of the zone, as it is an industrial use which provides employment opportunities to around 25 staff. The proposal seeks to uphold the third, fourth and fifth objectives as the use seeks to minimise adverse impacts on other land uses and the local amenity in its design and by utilising a number of measures to protect the local environment.
Clause 4.3 – Height of Buildings	Not mapped - no height of buildings control applies.	No specific building height restrictions are applicable to the site under the RLEP 2012. No changes are proposed to the external building height, therefore the development complies with the height of buildings development control.
Clause 4.4 – Floor Space Ratio	Mapped as 1:1 maximum FSR	The Floor Space Ratio (FSR) development control for the site is 1:1. The application does not seek to alter the existing gross floor area or approved FSR of the site. Notwithstanding, the existing FSR is calculated at around 0.53:1. This is below the maximum FSR for the site and therefore the development complies with this part. (i.e. Site Area is 1.538 ha, Gross Floor Area of the development (GFA) is around 8,162m^2 therefore calculated FSR is 0.53:1)

Development clause	Development standard criteria	Response
Clause 5.10 Heritage Conservation	Not mapped as a heritage item	The site is not a heritage item nor is it located within a Heritage Conservation Area (HCA). The development is unlikely to disturb any Aboriginal objects or places of heritage significance. There will be no impact on Heritage conservation as a result of the modification therefore the development is consistent with this control.
Clause 5.23 – Public Bushland		The modification will continue to preserve biodiversity, habitat corridors and links between public bushland and other nearby bushland. The proposed construction/installation works are largely internal to the existing building and unlikely to significantly impact nearby vegetation.
Clause 5.21 – Flood Planning	No flood planning map applies.	The land is not identified to be flood prone or within a flood planning area pursuant to Cl 5.21 in the CBLEP, and the development is consistent with this Clause.
Clause 6.1 – Acid Sulfate Soils	Not mapped as containing ASS.	The site is not located on any class of Acid Sulfate Soils (ASS). Further, the proposed construction works are wholly contained within the building and will not disturb the natural ground surface, and are not likely to lower the watertable. The development remains consistent with this control.
Clause 6.3 – Stormwater Management and Water Sensitive Urban Design	Clause 6.4 Applies to IN1 zoning.	The development is consistent with this control. The development is constructed on developed land which is predominantly covered in concrete hardstand. Additional environmental measures are proposed, including compliant bunding of chemical substances at the site. Therefore, there is low potential for leachate to penetrate the ground surface. The modification to the existing development is not expected to create significant adverse impact in the form of stormwater runoff to adjoining properties, bushland or receiving waters.
Clause 6.4 - Biodiversity	Not mapped as having biodiversity values.	The site is not mapped as having biodiversity values as identified on the Terrestrial Biodiversity Map.

Development clause	Development standard criteria	Response
		The modification is not expected to significantly affect any areas identified as having biodiversity values, or any areas with ecological values or significant flora and fauna. The modification is consistent with the intent of this control.

5.4.2 Canterbury Bankstown Development Control Plan 2023

The following table summarises the Canterbury-Bankstown DCP 2023 objectives and controls which are relevant to the proposed modification. A response is provided to address each DCP provision.

Table 3: Canterbury Bankstown DCP 2023 compliance table

Objectives & Controls	Response
Chapter 3 – General Requirements	
3.1 Development Engineering Standards	
Section 2 – Civil Engineering Requirements	No changes to vehicular footway crossing design or construction is proposed.
Section 3 – Stormwater Drainage Systems	No change to the stormwater infrastructure is proposed.
Section 4 – On Site Detention Systems	No external changes to the site are proposed, excepting replacement business signage.
3.2 Parking	
Section 2 – Off-street Parking Rates	The modification seeks to reduce the amount of carparking at the site from 76 car parking spaces to 58 car parking spaces. The nature of the site is an industrial use with delivery and offtake vehicles accessing the site from the northern driveway. The site has infrequent visitors using the existing parking bays accessed by the southern driveway and therefore the car parking is used almost exclusively by staff members. Staff numbers at the site include 20 office staff, 20 operations staff for the first shift, and 6 operations staff for the second shift. At staff changeover, a maximum amount of 46 staff may therefore require car parking at the site. 58 car parking spaces would accommodate the short period of time at shift changeover where parking may be required by all staff and provide an additional 12 car parking spaces for visitors or contractors. The modification therefore ensures that car parking demands of the site are able to be met.
Section 3 – Design and Layout	The site is designed to clearly separate staff parking areas from truck movements to ensure safe and efficient vehicular

Objectives & Controls	Response
	circulation in accordance with the original approval. Visitor parking is located near to the main entrance of the building. The design of loading docks are in accordance with the DCP requirements in that they: • are separate from parking circulation; and • allow vehicles to enter and exit in a safe manner and forward direction. Truck vehicle swept path analysis has been included to support the application. The proposed changes to approved signage would further assist in wayfinding around the site for visitors and staff.
3.3 Waste Management	
Section 5 – Industrial Development	Construction works include the installation of equipment and machinery. All construction waste dockets will be retained. Operational waste would be generated by staff at break times. Residual waste would also be generated from the processing line, however the overall purpose of the site is to reduce waste and separate materials until they can be sold back into the market for remanufacture. Waste is collected by a private waste collection contractor, or a special waste service in accordance with NSW EPA requirements. 2 x 240L bins will be stored undercover within the building for waste generated by staff.. Bins will be sized to accommodate the volumes of waste generated at the site. Bins will be screened from view of the public domain. A Waste Management Plan accompanies the application detailing the management of waste and recycling at the site. An on-site collection point is identified within the WMP which allows the safe and efficient servicing of bins at the site, at a minimum of once per week per waste and recycling stream.
3.6 Signs	
Signs in Zones B5, B6, IN1 and IN2 2.5 Council may allow development to have a pylon sign provided: (a) it is limited to one pylon sign for each site boundary that adjoins a classified road; (b) the sign is predominantly rectangular in shape with a vertical proportion; (c) the envelope of the sign is 4 metres or 9 metres in height (to encourage two consistent heights rather than a variety of heights) and a maximum 2 metres in width;	The proposed business identification signage and directional signage is in keeping with the design and character of the building and streetscape. The signage will use existing approved signage structures where possible and assist in the identification of the site for visitors. All signs are rectangular in shape with a vertical proportion. The business identification sign would otherwise be considered exempt development under the Codes SEPP, see further discussion under Section 5.5.7. Therefore, this signage would be considered to have minimal impact as changes are minor in nature. Due to the large street frontage (approx. 85m in length) and design of the site, the two directional signs will be required to be updated. The front gate sign will require a street number and directions to the staff and visitor carpark, and directions for

Objectives & Controls	Response
(d) the sign only identifies the businesses on the site and the street number to assist customers and visitors. 2.6 Council may allow development to have other business or building identification signs provided: (a) The total sign area on sites with a single street frontage does not exceed 1m2 per 2 metres of the street frontage. (b) The total sign area on sites with more than one street frontage does not exceed 0.5m2 per 2 metres of the street frontages. (c) Signs are suitably integrated with the architectural style of the building.	trucks to use the separate driveway for access. This will assist with safety, circulation and manoeuvring at the site. The proposed signage is not illuminated or flashing. The proposed signage does not dominate in terms of number, scale, proportion, form or any other attributes. Signage complies with the objectives and controls of the DCP.
3.7 Landscape	
Section 2 – Landscape Design Section 3 - Biodiversity	The modification application does not seek to modify or remove the existing landscaping at the site. Notwithstanding, the landscaping is consistent with the objectives of the DCP in that they contribute to the quality and amenity of the site, providing screening from public areas, retaining the planting of large and medium sized trees for habitat and provide deep soil zones.
Chapter 9 - Industrial Precincts	
9.1 General Requirements	
Section 2 – Building Form and Landscape **Development adjacent to residential zones** 2.7 In determining a development application that relates to a site adjoining land in Zone R2, R3 or R4, Council must take into consideration the following matters: (a) whether any proposed building is compatible with the height, scale, siting and character of existing residential development within the adjoining residential zone; (b) whether any goods, plant, equipment and other material used in carrying out the proposed development will be stored or suitably screened from residential development; (c) whether the proposed development will maintain reasonable solar access to residential development between the hours of 8.00am and 4.00pm at the midwinter solstice;	The site is located in proximity to an R2 zone to the south. Although the zone is separated by an RE1 zone immediately adjacent, an assessment has been undertaken in accordance with this section, below. (a) The facility has been operating for a number of years with consent. The modifications represent changes to the existing operations, and minor alterations to the site which do not impact the height, bulk or massing of the structures. The character of the zone is industrial in nature. (b) Additional plant and equipment will be screened from neighbours and the public domain. The electrowinning plant will be located internally within the building. Suitable measures will be taken during the installation to ensure visual amenity is maintained for nearby residents. The storage of materials will mostly be indoors, with some deliveries to be temporarily stored under the warehouse awning, covered and protected from the weather. The materials processing activity area is indoors. The goods delivery area is recessed behind site carparking and the office / administration areas. Additional plantings within the site along the fence line,

Objectives & Controls	Response
(d) whether noise generation from fixed sources or motor vehicles associated with the proposed development will be effectively insulated or otherwise minimised; (e) whether the proposed development will otherwise cause nuisance to residents, by way of hours of operation, traffic movement, parking, headlight glare, security lighting, fumes, gases, smoke, dust or odours, or the like; and (f) whether any windows or balconies facing residential areas will be treated to avoid overlooking of private yard space or windows in residences.	as well as established tree planting along the RE1 zone, separates and screens the Site from Biloela Street and residential dwellings. (c) No change to solar access will occur as a result of the modifications. (d) An acoustic report has been prepared to support the application, to assess the impacts of extended operation and additional plant on nearby sensitive receivers. The report concludes that the activities will achieve the noise project trigger levels and no further mitigation measures are required. (e) The modifications to the consent are not considered to cause nuisance to neighbours. The activities are not odorous, nor will they cause significant impact from air emissions. The impact of the changes are limited to extension of hours of operation which may impact traffic movement, and the reduction of car parking. The changes are not considered to significantly impact nearby residents. The site is required to meet noise criteria which has been assessed to ensure that impacts to nearby sensitive receivers are low. Trucks are required to keep to routes through the industrial zones only, thereby minimising nuisance due to air, light and noise emissions. Car parking provision will ensure the needs of the site are met and will not impact street parking in the area. An Environmental Assessment with further detail on noise, air emissions, traffic, and waste management is provided in Section 6. (f) No changes to the structure of the building are being sought which will impact overlooking into private spaces.
2.10 – 2.14 Open Space 2.15 – 2.16 Employee Amenities	The Site is developed in accordance with the development consent and provides landscaped areas along the perimeter boundaries, with setbacks containing established trees, shrubs and vegetation. Shaded employee amenities exist adjacent to plantings and garden areas in proximity to the administration building. This area is screened and located away from loading, servicing and processing areas.
Section 3 – Building Design	
3.15 General	The Site is existing and no changes are proposed to landscaping, setting or building structures. Changes to traffic and parking are not considered to negatively impact amenity of the area, and are discussed further in Section 6.3
Section 4 – Environmental Management	
4.1 Acoustic Privacy	A noise assessment has been prepared to support the application, considering the Noise Policy for Industry and the

Objectives & Controls	Response
	acoustic amenity of adjoining residential zoned land. Further discussion is provided in Section 6.2.
4.2 Pollution control	The development will adequately control fumes, emissions and potential water pollutants in accordance with the requirements of Council and the NSW EPA.
Section 5 – Site Facilities	
Storage areas 5.1 The storage and use of hazardous materials must comply with the requirements of WorkCover NSW and other relevant public authorities. 5.2 The storage and use of dangerous goods must comply with the Dangerous Goods (Road and Rail Transport) Act 2008 and its regulations, and any other requirements of WorkCover NSW.	Storage of materials is also described in Section 4.3. All storage will be in accordance with relevant legislation, best practice codes and comply with requirements other relevant public authorities. Storage of the product received and the output materials will be secured within the existing building. Some deliveries will be temporarily stored covered, under the large awning at the front of the site out of the weather before being processed inside the building. Storage of material will not be visible from the public domain.

5.5 State Planning Legislation

5.5.1 Environmental Planning and Assessment Act 1979

The Environmental Planning and Assessment Act 1979 (EP&A Act) and the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation) provide the framework for the assessment of the environmental impact of proposed development in NSW.

Part 3 of the EP&A Act provides for the formation of environmental planning instruments (EPIs), which can take the form of Local Environmental Plans (LEPs) or SEPPs. EPIs contain provisions that control the permissibility of development and identify when development approval is required. EPIs that are applicable to the Proposal are:

- Canterbury Bankstown Local Environmental Plan 2023

Section 4.15(1) of the EP&A Act specifies the matters which a consent authority must consider when determining a development application. The relevant matters for consideration under Section 4.15 of the EP&A Act are addressed in the Table below.

Table 4: Section 4.15 of EP&A Act 1979

Section	Comment
Section 4.15(1)(a)(i) Any environmental planning instrument	Consideration of the CBLEP is undertaken in Section 5.4.1of this SEE. The proposal is consistent with all relevant provisions.
Section 4.15(1)(a)(ii) Any proposed instrument that is or has been the subject of public consultation under this Act and has been notified to the consent authority.	Consideration of the draft CBLEP that is awaiting approval from the Department of Planning has been considered as part of this application. The proposal is consistent will all relevant provisions.

Section	Comment
Section 4.15(1)(a)(iii) Any development control plan	Consideration of the CBDCP is undertaken in Section 5.4.2 of this SEE.
Section 4.15(1)(a)(iiia) Any planning agreement	Not applicable.
Section 4.15(1)(a)(iv) Matters prescribed by the regulations	The EP&A Regulations are considered in Section 5.5.2 of this SEE.
Section 4.15(1)(b) The likely impacts of that development, including environmental impacts on both the natural and built environments, and social and economic impacts in the locality	The likely impacts of the development have been considered in Section 6 of this SEE.
Section 4.15(1)(c) The suitability of the site for development	Site suitability is addressed in Section 2of this SEE.
Section 4.15(1)(d) Any submissions made	Submissions will be addressed after public exhibition.
Section 4.15(1)(e) The public interest.	This development is in the public interest.

5.5.1.1 Modification of Consents

Section 4.55 of the EP&A Act sets out the provisions for the modification of development consents. Section 4.55 (1) modifications relate to *'modifications involving minor error, misdescription or miscalculation*', Section 4.55 (1A) modifications relate to *'modifications involving minimal environmental impact*' and Section 4.55(2) modifications relate to *'other modifications*'.

This application is being made pursuant to Section 4.55(2) of the EP&A Act as the development is considered to be substantially the same development to which the consent was originally granted. Minor changes to the consent are proposed to be made which do not change the approved activity for which the original consent was granted, however may require notification because of the nature of the changes.

5.5.2 Environmental Planning and Assessment Regulation 2021

Applications for modifications of consents are to be made pursuant to Part 5, Division 1, Cl 98 of the EP&A Regulation. Procedures and requirements of modifications are contained within this part of the Regulations. Content of modification applications are provided within Cl 100(1).

5.5.3 Protection of the Environment Operations Act 1997

The Protection of the *Environment Operations Act 1997* (PoEO Act) provides an integrated system of licenses administered by the Office of Environment and Heritage, to set out protection of the environment policies and to adopt more innovative approaches to reduce pollution in the environment.

The objectives of the PoEO Act are to protect, restore and enhance the quality of the environment, including the reduction in the use of materials and the re-use, recovery or recycling of materials. Some of the mechanisms that can be applied, under the PoEO Act, to achieve these objectives include reduction of pollution at source, monitoring and reporting of environmental quality.

The Proposal is minor in scale and is not likely to result in pollution of the environment, as outlined in the PoEO Act. All operations will be subject to licence conditions and regulated by the NSW EPA. The PoEO Act provides licensing thresholds for scheduled activities under Schedule 1.

A separate licence application is being sought under the PoEO Act for activities that trigger this requirement under the Act.

5.5.4 State Environmental Planning Policy (Biodiversity and Conservation) 2021

The *Biodiversity and Conservation SEPP* consolidates and replaces the previous SEPP (Vegetation in Non-Rural Areas) 2017, SEPP (Koala Habitat Protection) 2021, SEPP (Sydney Drinking Water Catchment) 2011 and a number of other SEPPs relating to biodiversity and conservation.

The Proposal has been considered against the provisions of the *Biodiversity and Conservation SEPP*. The proposal does not require clearing of vegetation nor is it expected to adversely impact koala habitat, foreshore areas or water catchments. The development is therefore consistent with the aims of the SEPP.

5.5.5 State Environmental Planning Policy (Resilience and Hazards) 2021

The *Resilience and Hazards SEPP* consolidates and replaces the previous *SEPP 33 – Hazardous and Offensive Development, SEPP 55 – Remediation of Land*, and *SEPP (Coastal Management) 2018*.

Chapter 3 relates to Hazardous and Offensive development. The SEPP outlines this kind of development and ensures that any measures proposed to be employed to reduce the impact of such development are accounted for, and risks are reduced and minimised.

The proposed use would not be considered a hazardous and offensive industry, as described in this SEPP, as there are no expected pollution discharges to air, water, or ground, as a result of operations. There are no expected significant adverse impacts to the locality as materials will be stored covered, out of the weather and in bunded and secured containers where required. A detailed assessment is provided in Section 6.6.

Chapter 4 aims to promote the remediation of contaminated land within the state and to reduce the risk of harm to human health and other aspects of the environment.

A consent authority must not give development consent for any development on land unless it has considered whether the land is contaminated, if the land is suitable in its contaminated state for the purpose of the development or if the land requires remediation for the proposed development or use of that land.

The Site is not located on any class of Acid Sulfate Soils. No earthworks or activities which would result in the disturbance of the soils are proposed. The Site is located within an industrial precinct and activities are taking place upon existing sealed hardstand concrete in accordance with the existing consent. The processing of material takes place wholly within the building. The activity would continue to operate in accordance with the existing approvals to function as a E-recycling facility. The development is hence consistent with the aims of the SEPP.

5.5.6 State Environmental Planning Policy (Transport and Infrastructure) 2021

The Transport and Infrastructure SEPP consolidates and replaces a number of previous transport and infrastructure related SEPPs to assist the approvals process for providing infrastructure in vital areas such as education, hospitals, roads, railways, emergency services and utilities.

Division 23 Clause 2.152 of the SEPP allows for development for the purpose of a waste or resource management facility (including resource recovery facility) to be carried out by any person with consent on land in a prescribed zone.

Prescribed zones are defined in Clause 2.151, which includes *IN1 General Industrial.*

The proposed development is consistent with the definition of a waste or resource management facility, and the site is located within a prescribed zone (IN1 General Industrial), therefore the development is permissible with consent.

With reference to Chapter 2.7 (1) 'Relationship to other environmental planning instruments' of the Transport and Infrastructure SEPP 2021, this instrument prevails over other planning instruments:

> Except as provided by subsection (2), if there is an inconsistency between this Chapter and any other environmental planning instrument, whether made before or after the commencement of this Chapter, this Chapter prevails to the extent of the inconsistency."

5.5.7 State Environmental Planning Policy (Industry and Employment) 2021

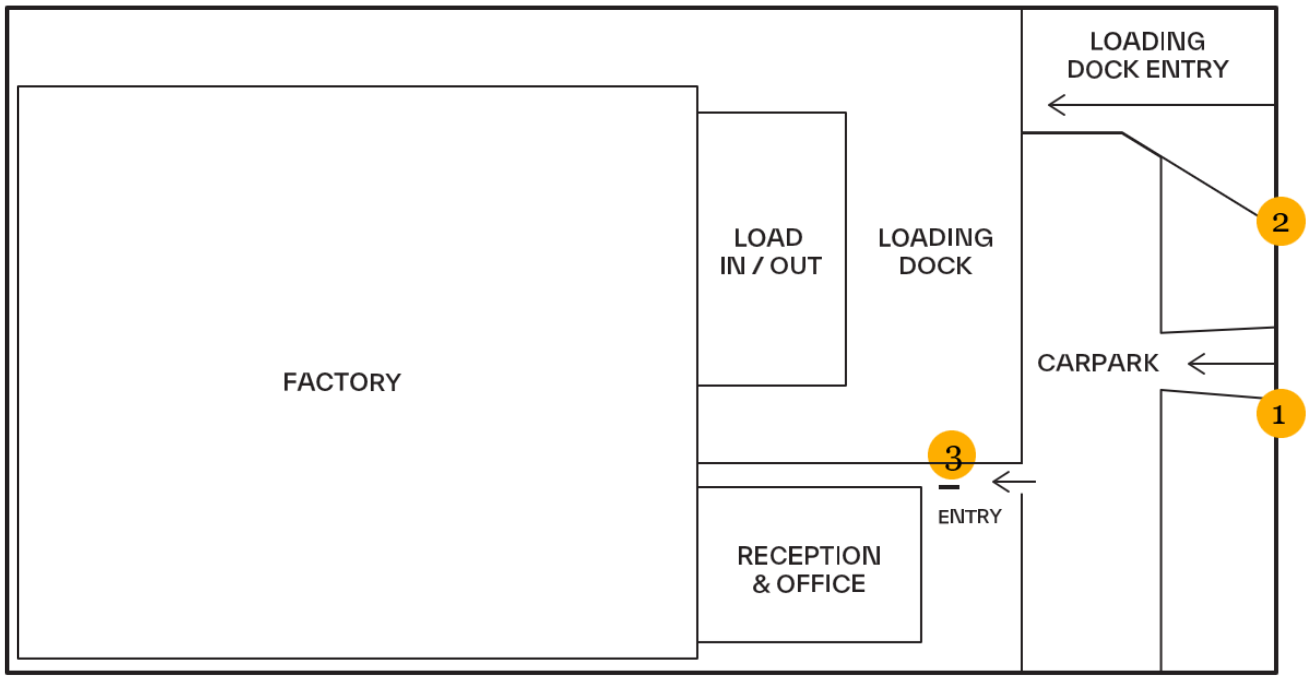
SEPP Industry and Employment 2021 replaces *SEPP 64 – Advertising and Signage* and *SEPP (Western Sydney Employment Area) 2009.*

The aim of Chapter 3 Advertising and Signage of the *SEPP (Industry and Employment) 2021* is to ensure outdoor advertising is compatible with the desired amenity of the area, provides effective communication in suitable locations and is of high quality design and finish.

Visitor Carpark Directional Sign

The application proposes three signs, one for the purpose of business identification and two directional signs to assist traffic and visitors to the correct driveway access. Location of the signs are denoted in Figure 10 below (labelled 1,2 & 3).

Figure 10: Location of proposed updated signage



Primary Business Identification Sign

The business identification sign seeks to replace the existing approved pylon sign for SIMS e-recycling (label 3). As the business owner has changed, the sign is to be painted (Dulux Teahouse – Charcoal) and replaced with Sircel Recycling's business logo. No changes to the size of the sign is proposed. The sign will not be illuminated or contain flashing lights. The sign sits 7.4m high, 2.2m in length with a 210mm depth.

Figure 11: Proposed signage (left) existing signage (right) (Label 3)

Front Fence-line Sign

The existing front gate directional sign (label 1) indicating the location of the car park is proposed to be moved from behind the fence where it is obscured, and fixed to the outer side of the fence, approx. 1m from the ground level. Colours will match Dulux Pale Grey and text will match Dulux Teahouse (Charcoal).

Figure 12: Directional signage (Label 1)

Front Gate Directional Signage

The front gate directional sign will utilise the existing signage structure and will contain the large street number (82-90) on the front and the rear. The backing will match Dulux Pale Grey and with text in Dulux Teahouse (charcoal). The sign will also contain the text 'Visitors Carpark & Deliveries (Arrow left) Loading Dock (Arrow right)'. The size of this sign is 3m in height, 2m wide with 240mm depth.

Figure 13: Front gate directional signage – front and back (Label 2)

The aim of Chapter 3 Advertising and Signage of the SEPP (Industry and Employment) 2021 is to ensure outdoor advertising is compatible with the desired amenity of the area, provides effective communication in suitable locations and is of high quality design and finish.

The proposed signage is assessed against the objectives of the policy, in particular the assessment criteria set out in Schedule 5 of the SEPP.

Figure 14: Signage assessment against Schedule 5 - SEPP (Industry and Employment) 2021

Provision	Compliance	Comment
Character of the area	Yes	The signage is in-keeping with the industrial character of the area in terms of design, siting and finish.
Special areas	Yes	The signage does not detract from the amenity or visual quality of any sensitive or special areas. The signage is located in an industrial zone surrounded by industrial uses.
Views and vistas	Yes	No important views or vistas are impacted by the signage. The signage respects the viewing rights of other advertisers.
Streetscape, setting or landscape	Yes	The scale, design and form of the signage is appropriate to the setting and character of the area. The changes to existing signage will tie in with the surrounding context and help to streamline messaging thereby improve the amenity of the site. The colour is recessive and will not dominate the character of the streetscape, which is industrial in nature.
Site and building	Yes	The proposed signage largely replaces existing signage on site and would otherwise be considered exempt development. The scale, proportion and positioning of the signage is acceptable and materiality is compatible with the finishes and colours of the building.

Provision	Compliance	Comment
Associated devices and logos	N/A	No safety devices, platforms, lighting devices or logos have been designed as an integral part of the signage or structure on which it is displayed.
Illumination	N/A	No illumination is proposed.
Safety	Yes	The proposed signage will not reduce the safety for pedestrians and vehicles accessing the area. The signage is considered to improve wayfinding around the site and thus improve safety for visitors.

The proposed signage is consistent with the objectives of the SEPP and satisfies the assessment criteria specified under Schedule 5.

5.5.8 SEPP (Exempt and Complying Development Codes) 2008

Notwithstanding the assessment above, the pylon sign and the front gate signage meet general requirements for exempt development under *Division 8 Advertising and signage exempt development code* in that it does not result in more than three business identification signs being installed in relation to a building that houses one commercial tenant. Does not interfere with any traffic signs, does not project over a public road.

The signage is consistent with specified development and development standards within *Subdivision 8 Replacement of identification signs in the Codes SEPP*. The replacement signage utilises the existing approved structures at the site, are not animated, flashing or illuminated and do not interfere with traffic signs. The signs would otherwise be exempt development under the SEPP and therefore these alterations are minor in nature and are acceptable.

6 Environment

6.1 Overview

The following sub-sections provide an assessment of potential impacts, including any mitigation measures that are in place to ensure the proposed modifications would not create any adverse impacts to the site or surrounding environment.

Operations would continue to mitigate risk of environmental impact in accordance with the original DA consent. Additional measures to protect the environment are described in the sections below.

As discussed throughout this SEE, processing activities would continue to be restricted to within the existing building. No building works, apart from the update of existing business and directional signage would occur outside of the building footprint. Storage of materials would primarily be indoors; some materials will be temporarily stored in the external loading dock, undercover and protected from the weather.

6.2 Noise

6.2.1 Existing Environment

Operational noise at the site is expected to be generated by:

- Vehicles entering and leaving
- Loading and unloading activities
- Forklift activity, and
- Processing by shredding, milling, rolling and sieving (located inside the factory building).

The nearest sensitive receivers are residential dwellings located at Biloela St, approximately 28 metres from boundary to boundary to the south of the site.

The predominant land use around the site is commercial or general industrial, which has existing levels of noise from plant and machinery as well as frequent vehicular movements.

6.2.2 Impact Assessment

6.2.3 Construction Noise

Construction work includes the installation of additional plant and equipment, as well as external signage. The bulk of the construction works will occur within the building. It is not expected that any perceivable noise difference would occur at the closest sensitive receiver due to construction at the site.

6.2.4 Operational Noise

A noise impact assessment has been undertaken by Koikas Acoustics to support the application. The assessment examines the noise impact of the operational changes at the site on the surrounding premises and residential receivers. The report also references the previous acoustic assessment prepared by Wilkinson-Murray for the original consent.

External ambient noise levels were measured by installing two sound level meter data loggers within the front yard of residential premises at 103 Biloela Street, and 93-95 Biloela Street. Noise from the facility was not audible during site visits. The ambient background noise is dominated by continuous mechanical plant noise at Red Oriental Construction at 61d Marple Ave during the daytime and evening periods. As a result, noise emissions from 61d Marple Avenue result in general industry hum to nearby residences. As per the EPA Noise Policy for Industry (NPfI) Section A1, general industry hum may be included in the measured background noise level if it is a usual feature of the area. As this noise source is a part of the normal ambience in this location, this has been included in the measured background noise level as it is representative of the area, as per the EPA Noise Policy for Industry.

Predicted operational noise was modelled for two scenarios, including for operations and deliveries, and deliveries only (during daytime/evening/night). Compliance is achieved with the adopted project noise trigger levels of the EPA's NPfI. No additional noise mitigation measures are therefore required.

The noise impact of the proposed electrowinning equipment is also examined. The proposed electrowinning equipment is a bespoke piece of equipment that is to be custom built for the facility. Where published noise data is unavailable, an estimated sound pressure level is adopted of approximately LAeq 65 dB at 1 metre away from the equipment. This will need to be verified after the equipment is installed. Although unlikely, if the equipment generates noise levels that result in exceeding noise emissions from the facility, the following measures are recommended:

- The equipment could be moved to a location where the direct line of sight between the equipment and the roller door opens is minimised;
- A noise barrier could be installed around the equipment. The noise barrier should be of solid construction, and extend at least 1 m higher than the top of the equipment, or extend from ground to ceiling height. Proposed barrier construction methods include:
    - 15 mm polycarbonate panels;
    - PVC-type formwork (eg Klionic Panel 0402 399 990). The cavity of this panel should be filled with as a minimum, sound insulation batts.

It should be noted that based on the proposed internal location, the nature of the electro-winning equipment and the operation of the existing e-waste facility, it is highly unlikely that the new electro-winning equipment will result in noise levels that exceed the adopted project noise trigger levels and compliance is expected to be achieved.

6.2.5 Traffic Noise

Noise prediction models include anticipated traffic movements at the facility, during extended operation hours. Noise modelling achieves project noise trigger levels.

6.2.6 Safeguards and Management Measures

Universal work practices to minimise noise and vibration emissions include:

- Regular identification of noisy activities and adoption of improvement techniques;
- Plant operations and delivery windows will be limited to those hours sought under this modification;
- Vehicles will be required to be turned off when not in use;
- A regular servicing and maintenance program will be adopted incorporating regular servicing of vehicles and equipment;
- Monitoring by staff for vehicle, maintenance and operational noise will be undertaken. Should a staff member become aware of any adverse noise issues they are to report the incident to their supervisor. The supervisor shall then implement an appropriate strategy to resolve the situation.

Additional mitigation measures are also recommended, should in the unlikely event the electrowinning equipment exceed acceptable levels of noise:

- The equipment could be moved to a location where the direct line of sight between the equipment and the roller door opens is minimised;
- A noise barrier could be installed around the equipment. The noise barrier should be of solid construction, and extend at least 1 m higher than the top of the equipment, or extend from ground to ceiling height. Proposed barrier construction methods include:
    - 15 mm polycarbonate panels;
    - PVC-type formwork (eg Klionic Panel 0402 399 990). The cavity of this panel should be filled with as a minimum, sound insulation batts.

6.3 Access, Transport and Traffic

6.3.1 Existing Environment

Truck access to the site is via a 25m wide driveway to the north of the eastern boundary of the site. After entering, the trucks would weigh in, deposit materials into the discharge bay to unload the contents from the trucks via a

forklift. A swept path assessment conducted by EB Traffic has been included with this application to describe the safe movement of vehicles at the site.

Other vehicles at the site include a number of electrically powered small capacity front end loaders (FEL) mainly for the transfer of materials to the plant hoppers and the movement of materials to product storage areas.

6.3.1.1 Staff and Visitor Parking

Staff and visitor parking is accessible via a secondary driveway to the south of the site, in an elevated car park which acts to screen loading areas behind from the public domain on Marple Avenue.

This modification seeks to reduce the amount of carparking at the site from 76 car parking spaces to 58 car parking spaces.

The nature of the site is an industrial use with delivery and offtake vehicles accessing the site from the northern driveway. The site has infrequent visitors using the existing parking bays accessed by the southern driveway and therefore the car parking is used almost exclusively by staff members.

Staff numbers at the site include 20 office staff, 20 operations staff for the first shift, and 6 operations staff for the second shift. At staff changeover, a maximum amount of 46 staff may therefore require car parking at the site, plus any visitors in attendance.

58 car parking spaces would accommodate the parking requirement at shift changeover, which has a maximum need for 46 spaces, and provide an additional 12 car parking spaces for visitors or contractors. The modification therefore ensures that car parking demands of the site are able to be met, and no pressure is put onto nearby local roads for car parking.

The application does not propose any alterations and additions at the site to increase floor space areas, which would require an update of car parking allowances. 58 staff and visitor car parking spaces is more than sufficient to service the needs of all personnel on site.

6.3.1.2 Truck Access & Vehicle Movement

The use of the site will remain consistent with the previous approval, however this modification seeks to extend the operation hours to modify windows to accept deliveries.

The overall breakdown of vehicles visiting the site are detailed below:

- Side loaders – approximately 7 vehicles in five months
- Semi-trailers – approximately 8 vehicles in five months
- Rigid trucks – approximately 9 vehicles per operational day
- Vans – approximately 5 vehicles per operational day
- Hook-bin trucks – approximately 1 vehicle per operational day

A swept path assessment conducted by EB Traffic has been included with this application to describe the safe movement of vehicles at the site.

The impact of extended operational hours are in accordance with the following table (Table 5).

Table 5: Vehicle movement summary by timeslot

Vehicle	Day	Movement / timeslot
Truck	Monday to Friday 6am – 10pm (operation and deliveries)	• 6.30am to 4pm main time slot for deliveries, estimate 2 trucks an hour • 4pm to 6pm 1 truck per hour • 6pm to 10pm 1 truck in total. Note deliveries would be scheduled past 8pm

Vehicle	Day	Movement / timeslot
Passenger Vehicles	Monday- Friday 6am to 10pm	• 20 operational staff 6am to 8am arrival • 20 operational staff 2pm to 4pm departure • 20 office staff approx. 9am arrival • 20 office staff approx. 5pm departure • 6 operational staff 2pm to 4pm arrival • 6 operational staff 8pm to 10pm departure
Truck	Saturday 7am to 3pm (operation), 7am to 6pm (deliveries)	• 1 truck an hour
Passenger Vehicles	Saturday 7am to 3pm (operation), 7am to 6pm (deliveries)	• 20 operational staff approx. 7am arrival • 20 operational staff approx. 3pm departure • Occasional office staff arrival and departure.
Truck	Sunday 10am to 6pm (deliveries only)	• 1 truck an hour
Passenger vehicle	Sunday 10am to 6pm	• 6 operational staff approx. 10 am arrival • 6 operational staff approx. 6pm departure

Truck vehicle movements are minor at a maximum of 2 trucks, or 4 vehicle movements (in and out), per hour.

Additionally, passenger vehicles are expected to arrive and depart at various time throughout the day.

The number of vehicle movements is unlikely to affect the local road network or cause queueing.

Vehicles are able to safely enter the Site, manoeuvre and leave in a forward-facing direction.

6.3.2 Safeguards and Management Measures

Conditions of the existing consent will continue to be upheld, including:

- Condition 20 of the existing consent restricts vehicular access to the site via Llewellyn Street. This condition requires vehicles to travel through the industrial zone, unless there is a car accident that prohibits vehicles from taking this route.
- Condition 30 requires that vehicles accessing the site shall be limited to semi-trailers or lighter. B-doubles will not be permitted at the site as specified by this condition.

Although there is minimal potential for impacts by the modification on traffic and transport access, mitigation measures are provided below:

- Site speed limits are to be observed at all times;
- No queueing of incoming trucks will be allowed to occur on Marple Avenue. All incoming trucks would await access to weighbridge or unloading bays on site.
- All vehicles entering and exiting the site must follow the designated routes.

6.4 Air Emissions

6.4.1 Existing Environment & Potential Impacts

The e-waste inputs are non-putrescible, clean, dry and solid and will be delivered and temporarily stored on pallets, in cages, or bulk bins within the materials receival area.

Vehicle movements on site will be relatively low, and the use of electrically-powered small capacity front end loaders (FEL) will not generate exhaust emissions.

The existing processing of materials occurs wholly within the building footprint. Existing plant is fitted with extraction systems to a dedicated baghouse. Storage of processed product would be inside the building.

The electro-winning plant comprises a series of closed-cell reaction vessels to chemically precipitate selected metals from the (wet) processing solution. Essentially the process is an enclosed and largely closed-loop system and the headspace from the reaction vessels is extracted to a wet scrubber. The lab will be equipped with a fume cupboard to perform bench top research and/or testing. The fume cupboard will be designed and operated in accordance with *AS/NZS 2243.8:2014 Safety in laboratories Part 8: fume cupboards* and will have an active extraction system which will be discharged to atmosphere at roof height.

6.5 Stormwater and Soils

6.5.1 Existing Environment

The proposed modification to extend operating hours and install additional plant and equipment at the site will not alter the impermeable footprint or existing stormwater infrastructure of the site. The nearest waterway is Prospect Creek located 1,320m south-west of the site, which leads to Dhurawal Bay and further into Georges River to the south.

6.5.2 Potential Impacts

The facility will handle and store hazardous chemicals and will process e-waste through an electrowinning process, which uses a solution of Sulphuric Acid to extract copper. Using liquids in materials processing requires control measure to contain materials in the case of a spill or accidental discharge.

Additional measures would be implemented to safely store and handle e-waste and chemicals onsite.

The e-waste inputs are non-putrescible, clean, dry and solid and will be delivered and temporarily stored on pallets, in cages, or bulk bins within the materials receival area. The receival area is undercover and materials will therefore be protected from contact with stormwater.

Chemicals for the electro-winning component will be delivered within the building in GHS compliant packaging. Storage of hazardous substances (acids, bases) will likewise be within the building. Liquids will be stored in bunded locations.

The electrowinning activity area will be bunded to 110% capacity of the largest tank to capture liquids in the case of accidental spills or tank failure. Chemical handling has been minimised, as chemicals will be fed into reactor tanks through fixed lines. Spills will be managed by immediate clean up using a spill kit, for which staff training will be provided.

Gross pollutants will be managed by containment of activities within the shed by daily site inspection and litter patrol. Litter impacts are unlikely as materials are received in a consolidated form and are processed internally. Materials are contained within bins in the process line and stray fragments are cleaned up on a daily basis.

The containment and controls proposed would ensure that the processing of e-waste on the proposed electrowinning line would not cause impacts to stormwater or ground.

6.5.3 Groundwater and soils

Apart from vegetated areas, the site is surfaced with hardstand concrete. The proposed modifications are not expected to cause any ground disturbance or create additional hard surfaces. Hardstand provides impervious layer that disrupts pathways to ground and groundwater contamination.

6.5.4 Flooding

The site is not mapped as subject to flooding.

Existing overland flows and ingress to neighbouring properties would not change as a result of the development. The development and use as an e-recycling facility would not cause erosion, siltation, destruction of riparian vegetation or a reduction in the stability of river banks or watercourses. Input materials will be handled within the existing building and will not be subject to flood impacts.

6.5.5 Mitigation and Management Measures

- Deliveries, operational activities and storage of materials will be undercover or within the existing building footprint;
- Hazardous materials will be stored securely and in bunded containers as appropriate;
- Manual handling of materials during operation will be minimised through engineering controls and operational processes; and
- Routine site inspection and litter patrol will be implemented.
- Liquids would be stored in bunds equivalent to 110% of the largest tank.
- Bunding of electrowinning activity areas including reactor tanks and circuits.
- Storage and handling of hazardous materials would be in accordance with Work, Health and Safety (WHS) legislation and national codes of practice. All chemicals will be stored in bunds, and stored based on reactivity and compatibility to ensure no incompatibles are stored together.

6.6 Hazard Management

6.6.1 State Environmental Planning Policy (Resilience and Hazards) 2021

The Resilience and Hazards SEPP contains planning provisions which came into force on 1 March 2022, consolidating a number of SEPPs, including SEPP 33 – Hazardous and Offensive Development. Chapter 3 – 'Hazardous and offensive development' of the SEPP applies to new development proposals that are potentially hazardous or offensive industrial or storage establishments. The objectives of the SEPP include; allowing such applications to be notified, ensure sufficient information for the consent authority to assess any measures proposed to reduce the impact of development are taken into account, and impose conditions to reduce or minimise any adverse impact.

The Hazardous and Offensive Development Application Guidelines – Applying SEPP 33 (HODAG) published by the Department of Planning & Environment in January 2011 provides detailed guidance on ascertaining whether the former SEPP 33 (and current Resilience and Hazards SEPP) applies to a development.

It is noted that this application is for a modification to an existing consent, not a new proposal. Notwithstanding, an assessment has been made in relation to the introduction of the new electrowinning processing line at the site and extended operation hours.

6.6.2 Potentially Hazardous Development

Chapter 7 and Appendix 2 to the HODAG provides guidance in determining if the use is potentially hazardous or offensive and therefore within the scope of applying the SEPP.

A potentially hazardous industry is defined as:

> *a development for the purpose of any industry which, if the development were to operate without employing any measures to reduce or minimise its impact, would pose a significant risk to human health, life or property, or to the biophysical environment.*

The HODAG provides a list of threshold levels, for the storage of dangerous goods and otherwise hazardous materials, above which the regulator considers the dangerous goods or hazardous materials storage to be potentially hazardous. In the event the threshold levels are exceeded, the SEPP applies and a Preliminary Hazard Analysis (PHA) is required.

The approximate quantity, classification and storage method of each hazardous material present at the site is in **Error! Reference source not found.** below. The materials on site do not exceed threshold amounts of 25 tonnes of

Class 8 PG II, or 50 tonnes for Class 8 PG III, and therefore the development is not potentially hazardous. Traffic movements for transportation of hazardous materials is below both vehicle movement and quantity per load thresholds. Therefore, potential risk is unlikely to be significant and is not potentially hazardous with respect to transportation.

Table 6: Storage of hazardous materials and dangerous goods

Substance	Quantity	Dangerous Goods Classification	Totals	Storage of Materials
Hydrogen Peroxide	4000L	N/A	N/A	Stored away from strong acids and bases.
Sulphuric Acid at 15%	21,000L – 24,000L	Class 8 corrosive substance PGII	24 tonnes total Class 8 PGII	Bulk acids received and stored in bunded IBCs. Acids stored away from bases.
Lithium Ion Batteries	250kg	Class 9 (Misc. dangerous goods) PGII	0.5 tonnes total Class 9 PGII	5 metres between lead acid batteries and other battery types Separated from other battery types, away from combustible materials and activity areas, labelled and sealed in an airtight container.
Lithium Metal Batteries	250kg	Class 9 (Misc. dangerous goods) PGII		
Lead Acid Sealed Batteries	5000kg	Class 8 corrosive substance PGIII	7 tonnes total Class 8 PGIII	
Alkaline Batteries	1500kg	Class 8 corrosive substance PGIII		
Ni-Cad Sealed Batteries	250kg	Class 8 corrosive substance PGIII		
NiMh Sealed Batteries	250kg	Class 8 corrosive substance PGIII		

Based on this assessment, SEPP 33 does not apply and accordingly, a PHA is not required to be undertaken.

Potentially offensive development

A potentially offensive industry is defined as:

> *a development for the purposes of an industry which, if the development were to operate without employing any measures (including, for example, isolation from existing or likely future development on other land)*

to reduce or minimise its impact in the locality or on the existing or likely future development on other land, would emit a polluting discharge (including for example, noise) in a manner which would have a significant adverse impact in the locality or on the existing or likely future development on other land, and includes an offensive industry and an offensive storage establishment.

In assessing offence, the *Applying SEPP 33* Guidelines indicates that information should be provided in the:

…quantity and nature of any discharges, and the significance of the offence likely to be caused by the development, having regard to the nature of the surrounding land use and the proposed controls. The need for any licences from the DECCW or other public authority should also be ascertained.

Based on the assessment in Table 7, the facility would not be classified as a potentially offensive industry.

Table 7: Offensive development assessment

Potential Discharge	Location	Controls	Significance
Noise	The distance from sensitive receivers and the proximity of road infrastructure would mitigate impacts due to noise.	Controls specified in the EPL regarding monitoring and maximum noise levels. The majority of equipment is powered by electric motors which do not have a significant noise component.	Nil.
Odour	The site is isolated from other receptors	None required. Materials would not be likely to cause offensive odours.	Nil.
Stormwater	The nearest waterway is Prospect Creek located 1,320m south-west of the site, which leads to Dhurawal Bay and further into Georges River to the south..	All receivals and storage will occur within the building footprint, undercover out of weather. Appropriate management of materials will mitigate the risk of impact to the environment.	Nil.

6.6.3 Hazard Risk

Key hazards and risks for the proposed development modification include:

- Spills;
- Vehicle movements within the site;
- Storage and handling of hazardous materials or dangerous goods;
- Fire;
- Medical emergencies;
- Environmental health hazards (noise, dust, fumes and lighting); and
- Slip, trip or fall risk.

Chemicals including sulfuric acid, hydrogen peroxide and batteries will be stored onsite.

Hazards are managed through the site's hazard and risk management protocol.

6.6.4 Mitigation Measures

Mitigation and management measures to control hazards and risks include:

- Minimal manual handling of materials through engineering controls, being through dosing systems and fixed lines;
- Correct labelling, packaging and GHS compliant storage of materials, including provision of bunding for all work areas;
- Bollards placed in front of acid IBCs to avoid accident risk;
- Display of safety signs;
- Maintaining a register of hazardous chemicals and providing notification to the regulator if manifest quantities if required;
- Identifying risk of physical or chemical reaction of hazardous chemicals and ensuring the stability of hazardous chemicals;
- Ensuring safety data sheets are readily accessible and appropriate to the materials being stored;
- Ensuring that exposure standards are not exceeded;
- Provision of health monitoring to workers;
- Provision of information, training, instruction and supervision to workers;
- Provision of spill containment system for liquid hazardous chemicals;
- Controlling ignition sources and accumulation of flammable and combustible substances;
- Provision and availability of fire protection, firefighting equipment and emergency and safety equipment;
- Preparing an emergency plan if the quantity of a class of hazardous chemical at a workplace exceeds the manifest quantity for that hazardous chemical;
- Installation of portable fire extinguishers;
- Design workflow areas to ensure enough space (height and width) for safe work and evacuation of workers.
- A risk management protocol will be prepared and implemented to manage incidents.

6.7 Fire and Incident Management

Fire management for the expanded operations will continue to be undertaken in accordance with the Proponent's Environmental Management Plan which includes a range of fire management and emergency procedures for the site.

6.7.1.1 Existing Environmental Protection Equipment

The schedule of existing fire protection equipment comprises:

- Alarm system managed through Chubb Code
- Automatic Fire Alarm monitoring system from connection with the NSW FB to Romteck Grid Pty Ltd – AFASP (Automatic Fire Alarm Service Provider) contracted to the NSW Fire Brigades. Automatic Signalling Equipment installed inside the building.
- Automated sprinkler system and smoke detector
- Fire Rover System
- Thermal cameras onsite as part of the Fire Rover system monitored 24/7, 365 days per year.
- 7 Fire hose reels
- 3 x dual point fire hydrants

6.7.1.2 Impact Assessment

Section 7 of the *Fire and Rescue Guideline Fire Safety in Waste Facilities* applies to the new development of a waste facility or an existing waste facility that is subject to a development control order issued by the relevant authority. The subject application is neither, however an analysis of performance measures has nevertheless been provided in Table 8 to demonstrate the provision of fire safety measures in accordance with the *Fire and Rescue Guideline Fire Safety in Waste Facilities.*

Table 8: Fire Safety Provisions

Performance category	Compliance
7.4 Firefighting intervention	✓ Adequate open space and unobstructed perimeter access around the building for fire brigade vehicles. ✓ An alarm system managed through Chubb Code. ✓ Automatic Fire Alarm monitoring system from connection with the NSW FB to Romteck Grid Pty Ltd – AFASP (Automatic Fire Alarm Service Provider) contracted to the NSW Fire Brigades. Automatic Signalling Equipment installed inside the building. ✓ A dedicated external quarantine area (4 x stockpile size) is able to be provided adjacent to the building. ✓ Fire fighter access is provided to buildings and storage areas.
7.5 Fire hydrant system	✓ Hydrants are located around the building as shown in the applicant's Fire Services Plan.
7.6 Automated fire sprinkler systems	Automated sprinklers have been installed in the building. ✓ Less than 1,000m^3 of material will be stored in the building, at a height of less than 4m ✓ Adequate open space and perimeter access is available around the building. ✓ Fire Rover system installed ✓ Thermal cameras on site as part of the Fire Rover system. They are monitored 24/7, 365 days a year.
7.7 Fire detection and alarm systems	✓ The Fire Rover uses Thermal Fire Detection systems for early warning of developing fire risk. ✓ A sprinkler system and smoke detector are installed in the main Distribution Board as well as Sub boards that report back to base monitoring conducted by JD Security
7.8 Smoke hazard management	✓ The building does not have a rise in storeys of more than two, and the Fire Rover provides an automatic fire detection and alarm system to allow early evacuation in the event of a fire. ✓ Fire Rover detects hotspots before fire and smoke are produced. ✓ Roller doors assist with venting de-stratified smoke and ensuring visibility is maintained. There is no active ventilation
7.9 Fire water run-off containment	✓ There is a retention basin at the end of the stormwater onsite which has the potential to be gated.
7.10 Bush fire prone land	The facility is not on bush fire prone land.

The facility is deemed to generally comply with Section 7 of the Guideline. The additional performance measure of thermal cameras provides for the detection of hot spots and enables an early response before heat becomes a fire.

Section 8 of the Guideline applies to new and existing waste facilities. The section addresses the operations and management of a waste facility to ensure fire hazards from combustible waste material fire is controlled. The section may be addressed by performance outcomes identified through risk management. Table 9 outlines the measures that are undertaken to limit the risk of fire at the facility.

Table 9: Facility Operation and Management

Performance Category	Compliance
8.2 Storage and stockpiles	✓ Storage is limited in size and maximum heights of stockpiles would not exceed 4m. ✓ Stockpile boundary limits will be clearly marked. ✓ Procedures for stockpile rotation and temperature monitoring will be included in the Operations Plan.
8.3 Stockpile movement	✓ Stockpiles are not likely to self-heat. ✓ Thermal detection cameras contained within the Fire Rover are installed to monitor for hot spots or over heating piles however, there is no stockpiling on site.
8.4 External stockpiles	✓ Loose stockpiles will be separated by a minimum of 5m, depending on fire risk and size of stockpile, in accordance with Table 3 of the Guideline. ✓ There are no fire-source features close to external stockpiles. There are no external sprinklers. ✓ External stockpiles will be maintained according to an Operations Plan. ✓ External stockpiles are within a secured site and are not subject to unnecessary risks such as bushfire, adjacent property fire, arson, self-combustion etc. ✓ External stockpiles are maintained so that access and egress points are accessible. ✓ External stockpiles are maintained for emergency access.
8.5 Internal stockpiles	✓ Procedures for internal stockpiles will be included in an Operations Plan. ✓ The maximum stockpile size will be <1,000m^3. ✓ Internal stockpiles are provided with minimum of 6m clear space on each accessible side. ✓ Building egress points would not be obstructed by stockpiles. ✓ Stockpiles of flammable materials will be separated from ignition sources. ✓ Stockpiles can be readily moved to external quarantine areas. ✓ Doors can be opened at any time, including when power is down.
8.6 Operations plan	✓ An Operations Plan will outline daily operations and describe the type of combustible waste and the storage and handling procedures. ✓ A site plan and holding inventory will be included in the Operations Plan and will outline the maximum storage limits.

	✓ The Operations Plan will be held at the site, will be reviewed regularly, and will be readily accessible. ✓ A 'Emergency Response Program' will be contained within an Operations Plan.

The facility is able to operationally comply with the requirements of Section 8 of the Guideline.

6.7.1.3 Workplace Fire Safety

Section 9 of the Guideline addresses workplace fire safety and is applicable to any person who conducts the business or undertaking (PCBU) of owning, operating or managing a waste facility. The section is to be addressed through risk management identification of hazards, assessment of risks, implementation of controls and review and audit processes.

Table 10: Workplace Fire Safety

Performance Category	Compliance
9.2 Risk assessment and mitigation	✓ Control measures, including instruction and training to employees (eg. an Emergency Plan) will be implemented. ✓ General safety procedures will be implemented ✓ Housekeeping procedures will be implemented ✓ Measures to control potential ignition sources will be implemented (including a restriction on smoking) ✓ Plant and equipment will be regularly inspected and maintained ✓ Vehicles and other equipment will be fitted with shrouds and spark arrestors and refuelled in designated areas away from combustible materials. ✓ Highly combustible and hazardous materials will be stored in accordance with statutory requirements and away from combustible waste. ✓ Appropriate signage and markings will be maintained. ✓ Security arrangements are in place.
9.3 Emergency Plan	✓ An emergency plan will be developed ✓ The emergency plan will address fire safety risks, and emergency response. ✓ The emergency plan will identify an emergency control organisation including fire wardens ✓ The emergency plan will identify safe evacuation routes, assemble are, shutdown processes, etc. ✓ All staff will receive appropriate training in fire safety. ✓ The emergency plan will identify a process of fire safety audits including stockpile limits, safe work practices, clear access, firefighting and emergency equipment.
9.4 Emergency Services Information Package (ESIP)	✓ An EISP will be developed ✓ The EISP will provide specified information that can be used to develop strategies for firefighting intervention.

9.5 Fire Safety Statements	✓ Fire safety systems will be inspected and maintained by a competent fire safety practitioner. ✓ An Fire Safety Statement is completed annually. ✓ If required, a supplementary Fire Safety Statement will also be completed. ✓ The premises owner is responsible for choosing a competent fire safety practitioner. ✓ The PCBU will make allowance for the inspection and maintenance of fire safety systems for the purpose of a fire Safety statement.

The PCBU currently implements measures that comply with Section 9 of the Guideline.

6.7.2 Mitigation and Management Measures

The facility has firefighting provisions for fire safety that generally comply with the *Fire Safety in Waste Facilities Guideline*.

Sircel is required to maintain stockpile limits and separation distances as outlined in Section 8 of the Guideline.

Recommended management measures include the development and/or implementation of:

- An Operations Plan;
- An Emergency Plan;
- An Emergency Services Information Package;
- Regular inspections;
- Maintenance of plant, equipment and fire safety systems;
- Training of staff; and
- Audit processes.

All necessary and reasonable efforts have been made in managing fire incidents for the proposed expanded operations at the site. Appropriate procedures, adequate fire protection equipment, and ongoing monitoring of operations and other relevant supporting documentation will ensure ongoing fire management to mitigate potential fire risk.

6.8 Waste Management

6.8.1 Existing Environment

Minimal construction waste is expected to be generated as a result of the modification.

A waste management system is already in place at the site to cater for operational waste generated by office and staff activities at the site. Waste generated by staff uses is minimal and able to be collected through mobile garbage bins (MGBs) for general waste and recycling.

A Waste Management Plan (WMP) was prepared in accordance with Council's recommended template and is included with the submission.

The plan concludes that the site can be serviced by:

- 1 x 240L bin for general waste and
- 1 x 240L bin for commingled recycling

Bins will be retained at the site near the roller doors as this is the likely point of collection. Sufficient space has been allocated for the storage of bins.

Bins will be serviced on a regular basis by a private waste contractor, at least once weekly. General waste will be sent to a landfill for disposal and commingled recycling will be sent to a suitably qualified recycling facility.

6.8.2 Mitigation and Management Measures

- Construction waste will be sent to a facility licensed for that type of material (if generated).
- Bins will be stored within the site boundary and be appropriately sized to capture the expected volumes of waste generated by the development.
- The site will be serviced on-site by a private waste contractor for waste streams generated through processing activities and staff activities at the site.

6.9 Biodiversity

6.9.1 Existing Environment & Potential Impacts

The development site has an area of approximately 1.538 ha and stands in an industrial precinct in Western Sydney. The site has been previously developed under the existing consent, with the operational area now covered by hardstand and building infrastructure. Trees and grassed areas line the front and side setbacks to Marple Ave and Biloela Street, and patches of trees and shrubs are dispersed around the site.

No vegetation would be removed for the proposed modification application and there would be no impacts on the habitat of native fauna. The likelihood of impacts to biodiversity values is therefore low.

6.9.2 Management Measures

- The existing site vegetation and landscape would remain as part of this modification;
- Vehicles would not be permitted to drive off the road into vegetated areas; and
- There would be no stockpiling, either temporary or permanent, in vegetated areas.

6.10 Socio-Economic Impact

The proposed development would have a net benefit to the region by the employment of 46 FTE personnel. The proposal will integrate and complement the Proponent's existing operations at the site and will utilise existing infrastructure and improvements, thereby representing an efficient use of existing infrastructure.

In the broader context, the facility is needed to extend the production of metals as a resource in the circular economy. Given the recent disruption to global supply chains – this local industry can provide support to ensure continuation of domestic processing at times of disruption caused by events such as pandemics and export bans.

Overall, it is considered that the proposal will continue to have numerous positive social and economic impacts which arise from increased employment opportunities and improved resource recovery. It is unlikely that there will be any negative social or economic impacts stemming from the proposal. As such, no mitigation measures are proposed or necessary.

6.11 Amenity

6.11.1 Existing Environment

The site is at a distance of approximately 38 metres to the nearest residence. The existing facility processes dry materials which have the potential to escape the designated delivery, storage and processing areas, causing litter and amenity issues. Light spill from the building has the potential to intrude on adjacent uses.

Additionally, noise and traffic could be the source of complaints from nearby businesses or sensitive receivers. Noise and traffic impacts have been addressed in Sections 6.2 and 6.3 of this SEE. According to the assessment, no adverse impacts from noise or traffic are expected or likely from the modification.

6.11.1.1 Potential Impacts

The modification is not expected generate significant adverse amenity impacts. The subject building is already operating as an E-recycling facility within an industrial environment and is separated from residential receivers by a road and buffer of vegetation.

Table 11 addresses potential amenity impacts.

Table 11: Amenity assessment table

Potential amenity impact	Comment
Noise and Vibration	Sources of noise and vibration impacts are from vehicle movements and processing equipment. The additional electrowinning equipment subject to this modification is largely powered by electric motors which do not have a significant noise component. All processing operations will occur indoors which will further reduce noise impacts on sensitive receptors. A noise assessment conducted by Koikas Acoustics found the facility will achieve project noise trigger levels.
Odour	The amount and nature of throughput materials means the process is not considered to be odorous.
Fumes	The process involves the operation of a closed-loop system of reaction tanks, with a low likelihood of the escape of fumes or fugitive emissions. Additional management measures and engineering controls will be put in place to ensure amenity impacts are eliminated. Mitigation measures are in place to ensure fumes from vehicles accessing the site are minimised.
Smoke and soot	Smoke and soot will not be generated by the proposal.
Dust	Friable materials are not generally part of the materials input stream. To avoid amenity impacts arising from dust, all operations would be inside the facility and the site would be kept tidy.
Traffic	Extended hours of operation will have minor impact on the generation of traffic at the site. These impacts are able to be appropriately managed through existing conditions of consent and mitigation measures proposed within Section 6.3. Construction in order to facilitate the development may have a short term impact with regard to increased traffic movements at the site, however this is considered temporary.
Waste	Minor amounts of construction waste is expected. Any construction waste will be reused or recycled on site where possible, or sent to a suitably licenced recycling or waste facility. Operational waste will be managed through existing systems of capture and collection, through general waste and recycling 240L MGBs and collected weekly or fortnightly as required by a private waste collection contractor.

6.11.2 Management Measures

Management measures regarding amenity in relation to of waste, traffic, air quality and emissions, and noise have been addressed in separate sections within Part 6 of this report. Additional management measures to supplement recommendations within the separate sections are as follows:

- All areas external to the buildings will be maintained in a clean, tidy and litter free condition.

6.12 Heritage

The site is not in proximity to a Local Heritage Item nor is it located within a Heritage Conservation Area (HCA) under Schedule 5 of the LEP.

In NSW, all aboriginal places and objects are protected by Heritage NSW and the Department of Planning Infrastructure and Environment under the stipulations of the National Parks and Wildlife Act 1974 (NPW Act).

MRA Consulting Group conducted a search of the State Heritage Inventory, resulting in:

- 0 Aboriginal Places listed under the National Parks and Wildlife Act
- 0 items listed under the NSW Heritage Act
- 0 items listed by Local Government and State Agencies

The site has previously been developed and no excavation is required for the proposed activity. No items of non-aboriginal heritage or Heritage conservation areas at the site have been identified under the NSW Heritage Act 1977. The risk of impacting items of aboriginal significance is therefore low.

7 Conclusions

The proposal is for a modification that is substantially the same as the existing approval, being for e-waste processing. The proposed modification will enable further separation of e-waste materials at the existing recycling facility at 90 Marple Ave, Villawood. The Site is established and able to receive all vehicles and manage all activities proposed. The Site also continues to support local jobs and industry within the Canterbury-Bankstown LGA.

Proving the measures outlined in this report have been implemented, the risk of adverse environmental effects is low. This SEE report has addressed potential impacts regarding noise and acoustics, air quality, water, traffic and transport, biodiversity, amenity, hazards and risks, heritage and socio-economic matters.

The proposed use has been assessed in accordance with relevant State Legislation, Environmental Planning Instruments and Development Control Plans; and is consistent with the aims and objectives of the plans. The Proposal is not likely to have any significant impact on the neighbouring properties including but not limited to noise and traffic. Therefore, the Proposal is recommended for Council approval.

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