



Environmental Impact Statement

Resource Recovery Facility (Mattress Deconstruction Facility)

29 Chifley Street, Smithfield

Lot 11 DP 805091

Prepared by Willowtree Planning Pty Ltd on behalf
of TIC (Mattress Recycling) Pty Ltd

May 2017

Environmental Impact Statement

Resource Recovery Facility (Mattress Deconstruction Facility)
29 Chifley Street, Smithfield

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Environmental Impact Statement

Resource Recovery Facility (Mattress Deconstruction Facility)
29 Chifley Street, Smithfield

CLAUSE 78A(8A) CERTIFICATE

Declaration Form

Submission of Environmental Impact Statement (EIS)
prepared under Clause 78A(8A) of the *Environmental Planning and Assessment Act 1979*

EIS Prepared By

Name	Thomas Cook
Qualifications	Bachelor of Planning, UWS
Address	Suite 7, Level 7 100 Walker Street North Sydney NSW 2060

In Respect Of

Resource Recovery Facility (Mattress Deconstruction Facility)

Development Application

Applicant Name	TIC (Mattress Recycling) Pty Ltd
Address	207 Sunshine Road Tottenham VIC 3012

Land to be Developed

29 Chifley Street, Smithfield
Lot 11 DP 805091

EIS

An Environmental Impact Statement (EIS) is attached.

Certificate

I certify that I have prepared the contents of this EIS and to the best of my knowledge:

- it is in accordance with Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*,
- contains all available information that is relevant to the environmental assessment of the development, activity or infrastructure to which the statement relates, and
- that the information contained in the statement is neither false nor misleading.

Signature



Name	Thomas Cook
Qualification	B.PLAN, UWS
Date	16 May 2017

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GLOSSARY OF TERMS

TERM	MEANING
Proponent	TIC (Mattress Recycling) Pty Ltd
AU\$	Australian Dollars
Council	Fairfield City Council
SEARs	Secretary's Environmental Assessment Requirements 8 May 2017.
DP&E	Department of Planning and Environment
DA	Development Application
EIS	Environmental Impact Statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i> (as amended)
EP&A Regulation	<i>Environmental Planning and Assessment Regulation 2000</i>
Willowtree Planning	Willowtree Planning Pty Ltd
OEH	NSW Office of Environment and Heritage
SEPP	State Environmental Planning Policy
Sqm or m²	Square metres
SREP	Sydney Regional Environmental Plan
The Site	29 Chifley Street, Smithfield (Lot 11 DP 805091)

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29 Chifley Street, Smithfield

EXECUTIVE SUMMARY

This Environmental Impact Statement (EIS) has been prepared by Willowtree Planning Pty Ltd on behalf of TIC (Mattress Recycling) Pty Ltd and is submitted to Fairfield City Council in support of a Designated Development Application for a proposed change of use to a Resource Recovery Facility (mattress deconstruction facility). The land to which this application relates is described as 29 Chifley Street, Smithfield (Lot 11 DP 805091).

Specifically, the proposal includes a change of use to facilitate the use of the existing warehouse on the site for a mattress deconstruction facility, being a type of resource recovery facility. No physical works are proposed pursuant to this development application. Rather, the existing site structures will accommodate the operations of TIC (Mattress Recycling) Pty Ltd, requiring only the installation of plant comprising of structures that are not permanent or fixed and thereby do not constitute development. Existing vehicular access to the site will be maintained, and the existing hardstand located to the south of the warehouse building will be utilised for car parking.

Further to the above, operations associated with the proposed facility include the collection and transportation of mattresses to the site, followed by the deconstruction of mattresses utilising cutting arms, peel rollers, shredders, foam balers and manual labour. Finally, mattresses will be sent off-site for recycling. These operations connote significant environmental and social benefits associated with the recovery and recycling of waste that would otherwise be disposed of as land fill, and also in conjunction with employment of staff from Soft Landing, being a social enterprise which employs those who have been out of the workforce for an extended period of time or are finding it difficult to break into the workforce.

The site is identified within Fairfield Local Government Area (LGA) and is zoned IN1 General Industrial pursuant to *Fairfield Local Environmental Plan 2013* (FLEP2013). The proposed use of the site for a resource recovery facility is permitted within consent and is also consistent with the IN1 zone objectives.

Pursuant to Schedule 3 of the *Environmental Planning and Assessment Regulation 2000* (the Regs) the proposal is deemed Designated Development. Although not meeting the volume thresholds for waste management facilities under Schedule 3 Clause 32, the site is affected by overland flooding and therefore triggers Designated Development under Schedule 3 clause 32(1)(d).

Under the *Environmental Planning and Assessment Act 1979* (the EP&A Act) it is required that a request for Secretary's Environmental Assessment Requirements (SEARs) be made prior to the lodgement of an application for Designated Development. Accordingly, SEARs were requested for the proposed development (Reference: SEAR 1149) and subsequently issued by the Department of Planning and Environment (DP&E) on 8 May 2017 (refer **Appendix 1**). In addition to the general requirements, the SEARs for the proposal outline a number of Key Issues to be addressed as part of this EIS, including:

- Strategic and Statutory Context;
- Waste Management;
- Hazards and Risk;
- Air Quality;
- Noise and Vibration;
- Traffic and Transport.

Based on the assessment undertaken within this EIS and its attachments in respect to relevant legislation and policy, it has been found that the proposed mattress deconstruction facility, being a type of resource recovery facility, is suitable for the local context and shall not result in any significant environmental impact. As such, it is recommended that the proposal be supported by Council for approval.

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PART A PRELIMINARY

1.1 INTRODUCTION

This Environmental Impact Statement (EIS) has been prepared by Willowtree Planning Pty Ltd on behalf of TIC (Mattress Recycling) Pty Ltd and is submitted to Fairfield City Council in support of a Designated Development Application for a proposed change of use to a Resource Recovery Facility (mattress deconstruction facility). The land to which this application relates is described as 29 Chifley Street, Smithfield (Lot 11 DP 805091).

This application seeks consent for a change of use to facilitate the use of the existing warehouse on the site for a mattress deconstruction facility, being a type of resource recovery facility. No physical works are proposed pursuant to this development application. Rather, the existing site structures will accommodate the operations of TIC (Mattress Recycling) Pty Ltd, requiring only the installation of plant comprising of structures that are not permanent or fixed and thereby do not constitute development. Existing vehicular access to the site will be maintained, and the existing hardstand located to the south of the warehouse building will be utilised for car parking.

Further to the above, operations associated with the proposed facility include the collection and transportation of mattresses to the site, followed by the deconstruction of mattresses utilising cutting arms, peel rollers, shredders, foam balers and manual labour. Finally, mattresses will be sent off-site for recycling. These operations connote significant environmental and social benefits associated with the recovery and recycling of waste that would otherwise be disposed of as land fill, and also in conjunction with employment of staff from Soft Landing, being a social enterprise which employs those who have been out of the workforce for an extended period of time or are finding it difficult to break into the workforce.

This EIS describes the site and proposed development, provides relevant background information, responds to the SEARs and assesses the proposed development in terms of the relevant matters set out in relevant legislation, environmental planning instruments and planning policies.

The structure of the EIS is as follows:

- Part A Preliminary
- Part B Site Analysis
- Part C Proposed Development
- Part D Legislative and Policy Framework
- Part E Consultation
- Part F Environmental Risk Assessment
- Part G Management and Mitigation Measures
- Part H Project Justification
- Part I Conclusion

1.2 PROJECT TEAM

The Project Team involved in the preparation of this application are:

- TIC (Mattress Recycling) Pty Ltd (Proponent)
- Willowtree Planning Pty Ltd (Planning Consultant)
- Real Serve (Land Surveyor)
- Axis Architectural (Architect)
- Sparks + Partners (Flood Engineer)
- Equilibrium (Waste, Air Quality and Fire Risk Consultant)
- Acoustic Logic (Acoustic Engineer)
- Ikon Fire & Safety (Fire Engineer)

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1.3 BACKGROUND

A Development Application was previously lodged with Fairfield City Council for the proposed use. Following a thorough assessment, Council deemed the proposal to trigger Designated Development. Council were supportive of the application, which had gone through all relevant referral departments, however could not determine the application due to triggering Designated Development.

Whilst the proposal is considered to be of low impact and intensity and does not meet the volume thresholds of Clause 32 (Waste Management Facilities), Schedule 3 of the Regs, the site is affected by overland flooding and therefore triggers Designated Development.

The significant environmental benefits attached to the proposed use have been recognised by the NSW Environmental Trust who have awarded a Grant of \$794,000 to TIC for the proposal. There are milestone dates to be met under the Grant. TIC are required to obtain Development Consent by 30 May 2017 and to be fully operational by the 30 July 17.

1.4 THE PROPONENT

The proponent is TIC (Mattress Recycling) Pty Ltd, as described in **Table 1**.

Table 1: Proponent Details

Contact Name	Michael Warren
Company Details	207 Sunshine Road, Tottenham VIC 3012
Contact Number	0411 757 187

1.5 COST OF WORKS

The proposal is for a change of use only and therefore the cost of works is \$0.

1.6 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

Application to receive SEARs was submitted to DP&E (Reference: SEAR 1149) and subsequently the SEARs were issued on 8 May 2017 (provided at **Appendix 1**).

An overview of how the requirements have been satisfied within the EIS is outlined in **Table 2**. This document is also consistent with the minimum requirements for Environmental Impact Statements in clauses 6 and 7 of Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*.

Table 2: How SEARs have been satisfied

General Requirements	Satisfied by...
<ul style="list-style-type: none">The Environmental Impact Statement (EIS) must meet the minimum form and content requirements in Clauses 6 and 7 of Schedule 2 of the Environmental Planning and Assessment Regulation 2000.	This EIS has been prepared in accordance with Clauses 6 and 7 of Schedule 2 of the Environmental Planning and Assessment Regulation 2000. The structure of this document addresses all legislative requirements.
Key Issues	Satisfied by...
<ul style="list-style-type: none">Assessment of all potential impacts of the proposed development on the existing environment (including cumulative impacts if necessary) and develop appropriate measures to avoid, minimise, mitigate and/or manage these potential impacts.	Assessment of the proposed development on the existing environment is provided within Part F and mitigation measures are provided in Part G .

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<ul style="list-style-type: none"> ▪ <i>Strategic Context – including:</i> <ul style="list-style-type: none"> - Detailed justification for the proposal and the suitability of the site for the development; - Demonstration that the proposal is consistent with all relevant planning strategies, environmental planning instruments and development control plans (DCPs), or justification for any inconsistencies; - A list of any approvals that must be obtained under any other Act or law before the development may lawfully be carried out. 	<p>The suitability of the site for the proposed development is outlined within Section 2.4, whilst relevant EPIs, strategic plans and policy documents are addressed in Part D.</p>
<ul style="list-style-type: none"> ▪ <i>Waste Management – including:</i> <ul style="list-style-type: none"> - Details of the type, quantity and classification of waste to be received at the site; - Details of the resource outputs and any additional processes for residual waste; - Details of waste handling including transport, identification, receipt, stockpiling and quality control; - Details of the measures that would be implemented to ensure that the proposed development is consistent with the aims, objectives and guidance in the NSW Waste Avoidance and Resource Recovery Strategy 2014-2021. 	<p>Waste management is addressed within the Waste Management Plan at Appendix 5 and in Part F.</p>
<ul style="list-style-type: none"> ▪ <i>Hazards and Risk – including:</i> <ul style="list-style-type: none"> - The EIS must include a preliminary risk screening completed in accordance with SEPP 33 – Hazardous and Offensive Development and Applying SEPP 33 (DoP, 2011), with a clear indication of class, quantity and location of all dangerous goods and hazardous materials associated with the development. Should preliminary screening indicate that the project is 'potentially hazardous' a Preliminary Hazard Analysis (PHA) must be prepared in accordance with Hazardous Industry Planning Advisory Paper No 6 – Guidelines for Hazard Analysis (DoP, 211) and Multi-Level Risk Assessment (DoP, 211); - Fire risk management and containment; - Flood risk. 	<p>The requirements of SEPP 33 are addressed in Section 4.8, whilst fire risk is addressed within the Fire Safety Statement at Appendix 9 and flood risk is addressed within the Flood Management Plan at Appendix 4. Further consideration of risk is offered within Part F.</p>
<ul style="list-style-type: none"> ▪ <i>Air Quality – including:</i> <ul style="list-style-type: none"> - Description of all potential sources of air and odour emissions; - An air quality impact assessment in accordance with relevant Environment Protection Authority guidelines; - A description and appraisal of air quality mitigation and monitoring measures. 	<p>Air quality is addressed within the Air Quality Impact Assessment at Appendix 6 and in Part F.</p>
<ul style="list-style-type: none"> ▪ <i>Noise and Vibration – including:</i> <ul style="list-style-type: none"> - A description of all potential noise and vibration sources during construction and operation, including road traffic noise; - A noise and vibration assessment in accordance with relevant Environment Protection Authority guidelines; - A description and appraisal of noise and vibration mitigation and monitoring measures. 	<p>Noise and vibration are addressed within Appendix 7 and in Part F.</p>

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<ul style="list-style-type: none"> ▪ <i>Traffic and Transport – including:</i> <ul style="list-style-type: none"> - <i>Details of road transport routes and access to the site;</i> - <i>Road traffic predictions for the development during construction and operation;</i> - <i>An assessment of impacts to the safety and function of the road network and details of any road upgrades required for the development.</i> 	<p>Traffic and transport are addressed within Part F.</p>
<p><i>Environmental Planning Instruments and other Policies</i></p> <p><i>The EIS must assess the proposal against the relevant environmental planning instruments, including but not limited to:</i></p> <ul style="list-style-type: none"> ▪ <i>State Environmental Planning Policy (Infrastructure) 2007;</i> ▪ <i>State Environmental Planning Policy No. 33 – Hazardous and Offensive Development;</i> ▪ <i>State Environmental Planning Policy No. 55 – Remediation of Land;</i> ▪ <i>Fairfield Local Environmental Plan 2013;</i> ▪ <i>Relevant development control plans and section 94 plans.</i> 	<p><i>Satisfied by...</i></p> <p>The proposal has been assessed against all relevant EPIs and policies within Part D and the supporting appendices.</p>
<p><i>Consultation</i></p> <p><i>During the preparation of the EIS, you must consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups and affected landowners. In particular you must consult with:</i></p> <ul style="list-style-type: none"> ▪ <i>Environment Protection Authority;</i> ▪ <i>Roads and Maritime Services;</i> ▪ <i>Fire & Rescue NSW</i> ▪ <i>Fairfield City Council;</i> ▪ <i>Surrounding owners and occupants likely to be impacted by the proposal.</i> <p><i>Details of the consultation carried out and issues raised must be included in the EIS.</i></p>	<p>Consultation has been carried out as documented in Part E and Appendix 12.</p>

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PART B SITE ANALYSIS

2.1 SITE LOCATION & EXISTING SITE CHARACTERISTICS

The subject site is identified as 29 Chifley Street, Smithfield, being legally described as Lot 11 in DP 805091. A Survey Plan is provided in **Appendix 2**.

The site exhibits an area of 1.34ha and is generally rectangular in shape with a street frontage to Chifley Street to the south. To the north the site is immediately adjoined by a similar warehousing facility, to the east the site adjoins a logistics facility, to the south warehousing and industrial facilities are located on the opposite side of Chifley Street, and to the west the site also adjoins warehousing and industrial development as well as a heavy vehicle repair station.

In its existing state, the site comprises a number of structures. Of primary relevance to the proposed development is the existing warehouse building located in the north-eastern corner of the site. Internally this existing warehouse have been divided into a number of distinct areas internally connected by fenced and shared walkways. An existing two-storey office and amenities in the north-eastern corner of the warehouse will be retained for this purpose. Externally, loading areas comprising roller shutter doors and awnings are located to the south, east and west of the warehouse. A car park is located in the south-eastern corner of the site. Access for all vehicles to the site is facilitated from Chifley Street by a driveway in the central section of the frontage and a Right of Way corresponding with the eastern site boundary.

Further to the above, a detached, single storey, 'L' shaped office building of brick construction with tiled roof, occupies the south-western corner of the site. This building comprises a separate tenancy and will not be affected by the proposal.

Limited vegetation exists within the site and consists mainly of small trees and shrubs within the front and side setbacks. A grassed area is located in the north-western corner of the site, and smaller areas of grass are also located in the vicinity of building entries.

As aforementioned, the site is currently used for warehousing and industrial operations, which is consistent with the surrounding context. The nearest residential receiver is located approximately 100m south-west of the site.

Transport infrastructure servicing the subject site includes the local road network with connections to Victoria Street (200m south), Smithfield Road (900m east), and the M4 Motorway (4km north) providing regional connectivity. Several bus routes utilise Chifley Street and provide connections to surrounding suburbs and the wider region. Fairfield Train Station is located approximately 4km south-east of the site and is serviced by the T2 and T5 lines.

The subject site can be seen in **Figure 1** and **Figure 2** below.

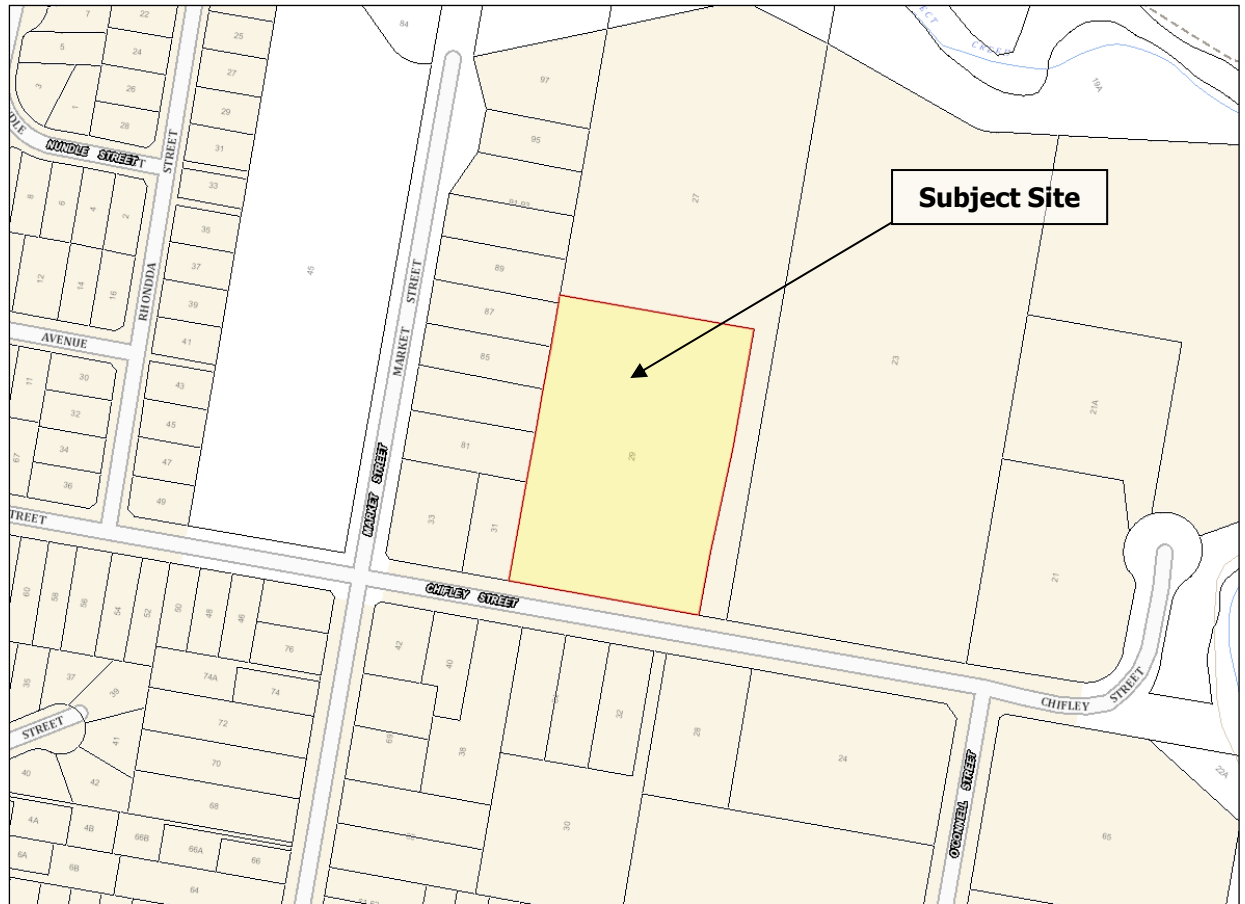


Figure 1: Cadastral Map (SIX Maps, 2017)



Figure 2: Aerial Map (Near Map, 2017)

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2.2 LAND OWNERSHIP

The land, which is the subject of this application, is under the ownership of Natale Antonio Finocchiaro. Owner's consent authorising lodgement of this application is submitted in accompaniment to this Designated Development Application.

2.3 SITE CONTEXT

The subject site is located within the suburb of Smithfield, approximately 32 kilometres (by road) west of the Sydney Central Business District (CBD).

The site is located within the Smithfield industrial precinct, being an area characterised predominantly by industrial and warehouse development, and generally defined by the Smithfield/Greystanes suburb boundaries to the north, Cumberland Highway and Fairfield Road to the east, The Horsley Drive to the south, and Market Street and Gipps Road to the west.

This industrial area is surrounded by low density residential suburbs, noting though that the nearest residential receiver to the site is located approximately 100m to the south-west.

Also of note, Prospect Creek and a linear reserve is located to the north of the site, traversing the industrial area east to west.

As well as comprising other industrial pockets and extensive residential suburbs, the broader context of the site includes Prospect Reservoir and Western Sydney Parklands.

The regional context of the site is shown in **Figure 3**.

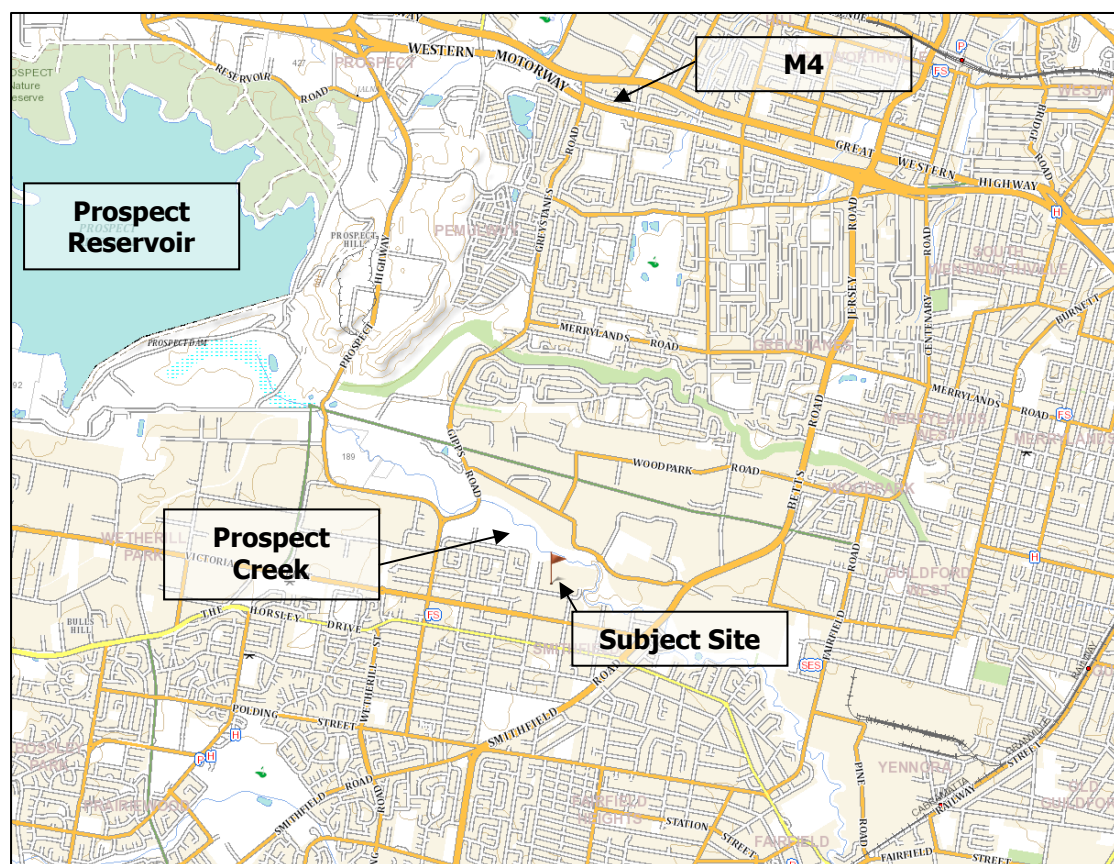


Figure 3: Site Context (SIX Maps, 2017)

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2.4 SITE SUITABILITY

The proposal provides for a resource recovery facility in the Smithfield industrial area on land that has been previously developed and used for similar warehousing and industrial operations and that is therefore highly suitable in respect of the physical environment of the subject site as well as the surrounding context.

In summary, the suitability of the site can be attributed to the following:

- The proposed resource recovery facility will make use of an existing warehouse and associated structures, thereby demonstrating its appropriateness for the subject site;
- The proposal is highly compatible with the surrounding context which is defined by similar industrial and warehousing operations;
- The site benefits from good access to the regional road network and is appropriately serviced by heavy vehicle routes;
- The subject site is suitably separated from residential receivers and therefore will not adversely impact on residential amenity;
- FLEP2013 permits resource recovery facilities with consent in the IN1 General Industrial zone;
- The proposal will not result in any unacceptable environmental impact but rather employs suitable measures to mitigate any potential impacts associated with the proposed operations.

Accordingly, the suitability of the development in the proposed location is demonstrated.

PART C PROPOSED DEVELOPMENT

3.1 OBJECTIVES OF THE PROPOSAL

The following objectives have been identified as forming the basis of the proposed development of the subject site to accommodate the proposed resource recovery facility:

- Design the site to achieve viable economic return;
- Ensure minimal environmental and amenity impact;
- Support employment generating land uses;
- Provide wider social and environmental benefits; and
- Ensure development is compatible with surrounding development and the local context.

The site and proposed design are considered to meet the objectives of the project as it allows for the use of existing facilities that are located within an established industrial area.

3.2 DESCRIPTION OF THE PROPOSAL

Consent is sought for a change of use to facilitate the use of the existing warehouse on the site for a mattress deconstruction facility, being a type of resource recovery facility. The previous use of the facility was for warehouse and distribution purposes.

No physical works are proposed as part of this development application. Rather, the existing site structures will accommodate the operations of TIC (Mattress Recycling) Pty Ltd.

The proposed use of the facility will include the installation of deconstruction equipment (plant) by the tenant including foam baler, shredder, peel roller and ducted extraction system. This equipment however does not entail physical works and are not permanent/fixed structures.

The plant consists of a conveyor system which passes the mattresses past a fixed cutting blade, cutting the back of the mattress into a safety chamber where cutting arms cut the front and sides of the mattress. The textile is then peeled off by an automated peel roller and the mattress components are baled and sent off site to recyclers.

The springs are shredded with a special purpose shredder and a sophisticated dust extraction system is used to capture the dust emitted from the process.

The hardstand area located directly south of the warehouse building will be utilised for an additional ten (10) onsite parking spaces. This parking area will maintain private vehicles entry, with a separate entrance provided for truck deliveries located adjacent to Office 2.

Operational Details:

- Staff: Approximately 10 staff at any one time on site.
- Hours of Operation: 6:00am – 4:00pm Monday – Friday.
- Vehicles: 10 pallet trucks will be used to carry collected mattresses and deliver to the site. The pallet trucks will arrive on week days between 1:00pm – 4:00pm.
- Waste: Approximately one hook bin collection of the recycled metal and two hook bin covered collections of waste for landfill will be carried out daily. These bins are 30 cubic meters.
- Parking: 10 spaces allocated for the use of the tenancy.
- A separate vehicle entry is provided for delivery trucks and private vehicles.

The proposed machinery and operations are illustrated in **Appendix 3** and **Figure 4** below.

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3.3 OPERATIONAL PROCEDURES

The proposed mattress deconstruction facility is to carry out the following operational procedures:

1. Collection of mattresses
2. Conveying the mattresses
3. Cutting the mattresses for the release of the top and bottom textile layers
4. Pushing the mattresses to the dissecting stage
5. Peel rollers utilised to remove the textile
6. Foam is separated manually
7. Spring set and connected flock sent to shredder
8. Windsifter separated metal from flock
9. Foam is baled and sent off site for recycling
10. Metal is shredded and sent off site for recycling

The proposed mattress deconstruction facility is expected to:

- Deconstruct approximately 140,000 mattresses per year;
- Total weight of mattresses deconstructed per year will be approximately 4,200 tonnes;
- The facility will avoid approximately 105,000m³ of land fill each year;
- The facility will recover approximately 3,000 tonnes per year of steel and foam which will be recycled instead of going to landfill;
- The facility will recover approximately 1,200 tonne per year of textile material which will be used as a fuel source at a locally based waste to energy company.

The operations of the proposed use as described above are considered to remain generally consistent with the nature of previous and current activities carried out within the site and locality and do not include any activities which may be intrusive or cause harm to surrounding land uses.

The proposed use is considered to provide significant community and social benefit as TIC (Mattress Recycling) Pty Ltd intend on subletting approximately 600m² of the tenancy to a Soft Landing. Soft Landing is a social enterprise which employs those who have been out of the workforce for an extended period of time or are finding it difficult to break into the workforce. Their staff will manually deconstruct bases, compacted and wet mattresses.

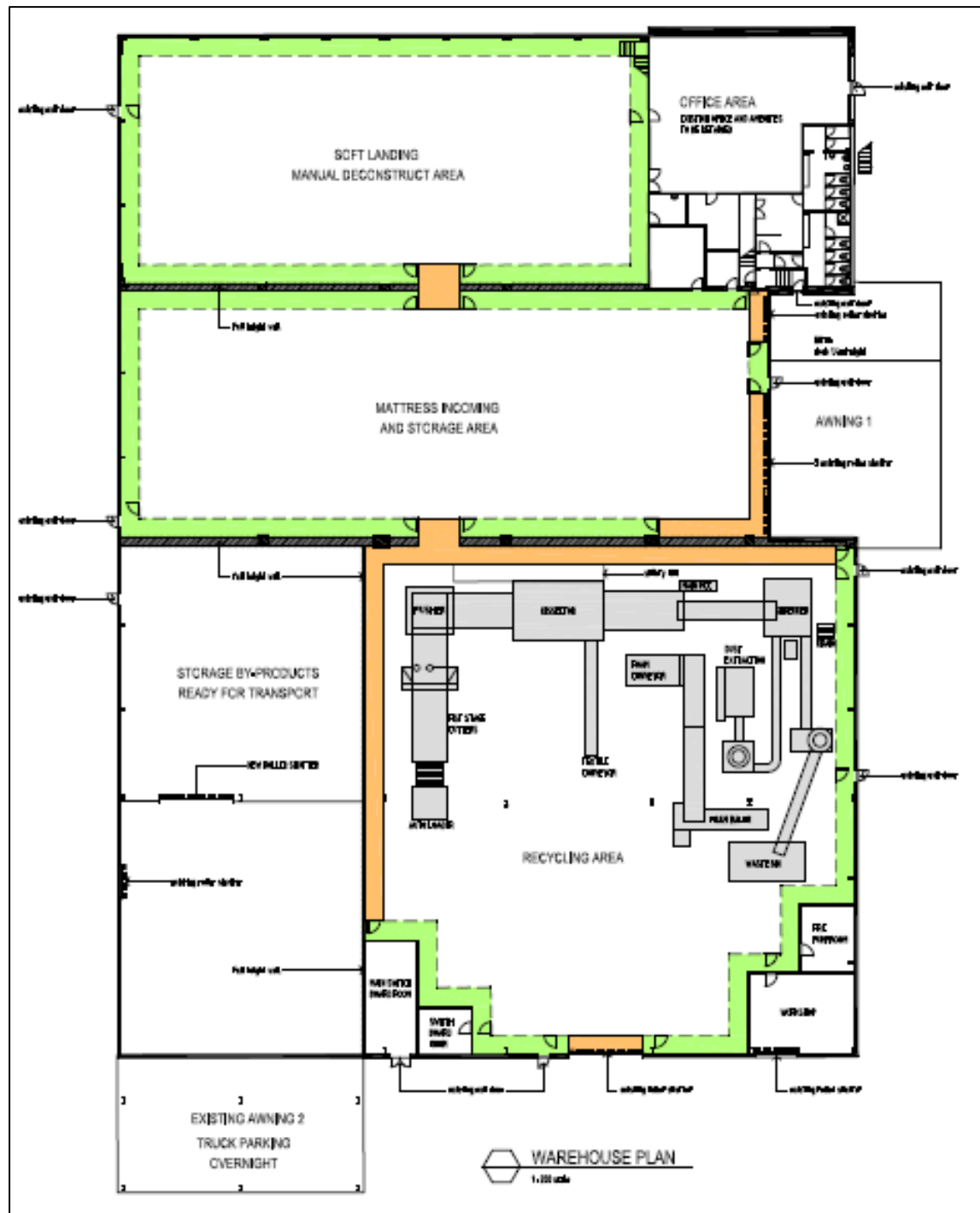


Figure 4: Floor Plan (Axis Architectural, 2017)

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3.4 DRAWINGS

Drawings for the proposed development are outlined in **Table 3**.

Table 3: Drawing Schedule

Drawing No.	Description	Author
	Survey Plan	Real Serve
CD/A201 B	Site Plan and Warehouse Plan	Axis Architectural

3.5 SUPPORTING DOCUMENTS

Documents provided in support of the proposal are outlined in **Table 4**.

Table 4: Document Schedule

Appendix No.	Description	Author
Appendix 1	SEARs	Department of Planning and Environment
Appendix 2	Survey Plan	Real Serve
Appendix 3	Site Plan and Warehouse Plan	Axis Architectural
Appendix 4	Flood Management Plan	Sparks + Partners
Appendix 5	Waste Management Plan	Equilibrium
Appendix 6	Air Quality Impact Assessment	Equilibrium
Appendix 7	Noise and Vibration Assessment Report	Acoustic Logic
Appendix 8	Fire Risk Management and Containment Strategy	Equilibrium
Appendix 9	Annual Fire Safety Statement	Ikon Fire & Safety
Appendix 10	TIC Fact Sheet	TIC (Mattress Recycling) Pty Ltd
Appendix 11	Section 149 Certificate	Fairfield City Council
Appendix 12	Evidence of Consultation and Agency Responses	Various Agencies

3.6 PROJECT NEED

In response to the operational needs of TIC (Mattress Recycling) Pty Ltd, it has been determined that the proposed resource recovery facility is required.

From an environmental viewpoint, the proposed facility is required to reduce the impost on landfill through the recovery and recycling of waste. In total, it is estimated that annually, the proposed operations will avoid approximately 105,000m³ of land fill and will recover approximately 3,000 tonnes of steel and foam. Additionally, the facility will recover approximately 1,200 tonne per year of textile material which will be used as a fuel source at a locally based waste to energy company. The proposed operations also provide raw material for future recycling opportunities. These procedures are considered to be valuable to the environmental health of the region and demonstrate significant environmental benefits.

The proposal is also required from a social perspective, given the facility's collaboration with Soft Landing. Soft Landing is a social enterprise which employs those who have been out of the workforce for an extended period of time or are finding it difficult to break into the workforce. Their staff will manually deconstruct bases, compacted and wet mattresses. Accordingly, the proposal will generate valuable employment opportunities for a vulnerable sector of the population with wide-ranging social and economic benefits.

A more detailed justification of the need for the proposed resource recovery facility is provided in **Part H** of this EIS. The environmental risk assessment undertaken in **Part F**, concludes that the proposal is consistent and commensurate with state, regional and local planning objectives, the environmental characteristics of the site and the surrounding context.

3.7 CONSIDERATION OF ALTERNATIVES

The intention of the proposal is to adapt an existing warehouse for a resource recovery facility (specifically a mattress deconstruction facility). It is considered that the proposal:

- allows for the development as a permissible use;
- has appropriate access to the regional road network;
- is compatible with surrounding development and the local context;
- will result in minimal impact on the environment; and
- will allow for the implementation of suitable mitigation measures where required.

The site and proposed design are considered to be appropriate for the proposal as it allows for development on land that has been previously developed and is situated within an established industrial precinct. The proposal maintains consistency with the objectives of the zone and enhances the underlying industrial character intended for the locality. The proposal will also provide significant environmental, social and economic benefits, whilst protecting the local environmental and sensitive land uses in proximity of the site.

The options considered, and subsequently dismissed, in arriving to the current proposal included:

(a) 'Do Nothing' Scenario

This option was dismissed as the objectives of the project would not be met.

If the proposal was not to proceed, the site would be utilised for other industrial and warehousing purposes and would forgo the opportunity to provide significant environmental and social benefits.

(b) Development on an Alternative Site

Consideration to alternative sites were made, however these were dismissed as the subject site resulted in the most beneficial outcomes for the proposal as:

- it will be located within a locality that is surrounded by industry and employment generating uses;
- the site has appropriate proximity from sensitive land activities including residential development;
- all potential environmental impacts of the proposal can be suitably mitigated within the site;
- the proximity to the regional road network provides increased economic benefits;
- the proposal will not affect any area of heritage or archaeological significance; and
- the proposal can be developed with appropriate visual amenity given its surrounding context.

The proposal is justified on the basis it is compatible with the locality in which it is proposed while having no unacceptable economic, environmental or social impact.

PART D LEGISLATIVE AND POLICY FRAMEWORK

Controls and Policies

The following current and draft Commonwealth, State, Regional and Local planning controls and policies have been considered in the preparation of this application:

State Planning Context

- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning & Assessment Regulation 2000*
- *Protection of the Environment Operations Act 1997*
- *Water Management Act 2000*
- *NSW 2021: A Plan to Make NSW Number One*
- *A Plan for Growing Sydney*
- *Draft South West District Plan*
- *State Environmental Planning Policy (Infrastructure) 2007*
- *State Environmental Planning Policy No. 33 – Hazardous and Offensive Development*
- *State Environmental Planning Policy No. 55 – Remediation of Land*

Local Planning Context

- *Fairfield Local Environmental Plan 2013*
- *Fairfield Development Control Plan 2013*

This planning framework is considered in detail in the following sections.

4.1 ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979

Section 79C of the *Environmental Planning and Assessment Act 1979*, requires that in determining a development application, a consent authority is to take into consideration the following matters as are of relevance to the development:

- (a) *the provisions of:*
 - (i) *any environmental planning instrument, and*
 - (ii) *any proposed instrument that is or has been the subject of public consultation under this Act and that has been notified to the consent authority (unless the Director-General has notified the consent authority that the making of the proposed instrument has been deferred indefinitely or has not been approved), and*
 - (iii) *any development control plan, and*
 - (iii) *any planning agreement that has been entered into under section 93F, or any draft planning agreement that a developer has offered to enter into under section 93F, and*
 - (iv) *the regulations (to the extent that they prescribe matters for the purposes of this paragraph), and*
 - (v) *any coastal zone management plan (within the meaning of the Coastal Protection Act 1979),**that apply to the land to which the development application relates,*
- (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,*
- (c) *the suitability of the site for the development,*
- (d) *any submissions made in accordance with this Act or the regulations,*
- (e) *the public interest.*

These matters are discussed in the following sections.

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4.2 ENVIRONMENTAL PLANNING AND ASSESSMENT REGULATION 2000

Pursuant to Schedule 3 of the *Environmental Planning and Assessment Regulation 2000* (the Regs) the proposal is deemed Designated Development.

Specifically, Clause 32 of Schedule 3 relates to waste management facilities or works, meaning the following:

Waste management facilities or works that store, treat, purify or dispose of waste or sort, process, recycle, recover, use or reuse material from waste.

Clause 1(d)(v) provides as follows:

(1) Waste management facilities or works that store, treat, purify or dispose of waste or sort, process, recycle, recover, use or reuse material from waste and:

(d) that are located:

(v) on a floodplain

Given the proposed waste management facility is located within an existing floodplain, the triggers for Designated Development under Clause 4(1)(d) of Schedule 3 of the Regs are exceeded.

4.3 PROTECTION OF THE ENVIRONMENT OPERATIONS ACT 1997

Schedule 1 of the *Protection of the Environment Operations Act 1997* (POEO Act) contains a core list of activities that require a licence before they may be undertaken or carried out. The definition of an 'activity' for the purposes of the POEO Act is:

"an industrial, agricultural or commercial activity or an activity of any other nature whatever (including the keeping of a substance or an animal)."

Schedule 1 of the POEO Act lists the scheduled activities requiring an Environmental Protection Licence. The proposal is for a change of use to the existing building. The proposed land use will not involve any activity list under Schedule 1 of the POEO Act and therefore does not require the issuing of an Environmental Protection Licence. This was confirmed by the NSW EPA in the process of applying for the Waste Less Recycling More Grant as the volumes being processed would not reach the thresholds for a facility that may be considered to be a waste and resource recovery facility.

4.4 WATER MANAGEMENT ACT 2000

The object of the *Water Management Act 2000* is the sustainable and integrated management of the state's water for the benefit of both present and future generations.

The subject site is located approximately 160m from a natural watercourse being Prospect Creek to the north of the site. The proposal therefore does not require controlled actively approval pursuant of Clause 91(2) of the *Water Management Act 2000* for a controlled activity.

Furthermore, the proposal does not require referral to the NSW Office of Water.

4.5 NSW 2021: A PLAN TO MAKE NSW NUMBER ONE

NSW 2021 is the NSW government's ten (10) year plan to '*rebuild the economy, provide quality services, renovate infrastructure, restore government accountability, and strengthen the local environment and communities*'. NSW 2021 replaced the previous State Plan as the NSW Government's strategic business plan, setting priorities for action and guiding resource allocation. NSW 2021 is a plan for change with ambitious goals and challenging targets.

The NSW 2021 Plan identifies five key strategies that the Plan is based around including:

- *Rebuild the economy;*
- *Return quality services;*
- *Renovate infrastructure;*
- *Strengthen our local environment and communities;*
- *Restore accountability to government.*

In accordance with the goals, targets and priority actions underpinning these strategies, the proposal will, through the provision of employment-generating development, positively contribute to the economy and support the continued viability of industry in NSW.

4.6 A PLAN FOR GROWING SYDNEY

A Plan for Growing Sydney was introduced by State Government in December 2014 and replaced the Metropolitan Plan for Sydney 2036. The Plan is intended to guide land use planning decisions for the next 20 years and presents a strategy for accommodating Sydney's predicted population growth over this time. It balances the need for more housing, but also cultivates the creation of strong and resilient communities within a highly liveable city whilst protecting the natural environment and biodiversity.

To achieve the Government's vision for Sydney as *a strong global City, a great place to live*, the Plan sets out four main goals; for Sydney to be:

- *a competitive economy with world-class services and transport;*
- *a City of housing choice with homes that meet our needs and lifestyles;*
- *a great place to live with strong, healthy and well connected communities; and*
- *a sustainable and resilient City that protects the natural environment and has a balanced approach to the use of land and resources.*

The proposed resource recovery facility will support employment generation and contribute to a competitive economy, thereby achieving the key directions of A Plan for Growing Sydney. Also in accordance with A Plan for Growing Sydney, the proposal will support sustainability objectives through the provision of an important recycling facility that will significantly reduce the volume of mattress waste disposed of as landfill.

4.7 DRAFT SOUTH WEST DISTRICT PLAN

The draft South West District Plan forms the overarching strategy for future planning in the area in order to forge opportunity, success and prosperity, promote innovation, create smart jobs, establish international business connections and support global investment. The South West District Plan also seeks to create a 'global innovation gateway' for the Western City, accommodate the growing and diverse population by providing housing choices close to jobs, promote a range of jobs and new business opportunities particularly in conjunction with the new Western Sydney Airport, and support growth with integrate public and active transport networks.

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The Plan establishes a number of priorities and actions to guide growth, development and change, relating to productivity, liveability and sustainability. The priorities and actions relevant to the subject sites and the wider South West District are discussed as follows.

Productivity Priorities

The economic opportunity created by the Western Sydney Airport will allow the South West District to shift from a place to accommodate homes for Greater Sydney's housing market to an attractor of major economic activity. Growing communities will be supported by the attraction of the jobs, health and education facilities, shops and other services and facilities.

The proposal will support the generation of economic activity and employment through the provision of a resource recovery facility, thereby contributing to the desired transformation of the South West.

Liveability Priorities

Additional housing and new neighbourhoods to improve choice, diversity and affordability, coordinated with transport, jobs, centres, waterways and parks, are required in response to population growth and demographic change.

By providing for industrial development within designated employment lands, the proposal represents a development that is highly compatible with its surrounds and will in no way compromise the amenity and liveability of the District. Rather, by providing employment generating activities, the proposal will support the provision of jobs close to where people live therefore promoting liveability.

Sustainability Priorities

As well as growing, environmental assets should be protected and enhanced. Specifically, landscapes, waterways and biodiversity are to be enhanced, rural areas and flood hazards managed, and Sydney's Green Grid delivered.

The proposed resource recovery facility will positively contribute to the environment by reducing the impost of landfill. In total, it is estimated that annually, the proposed operations will avoid approximately 105,000m³ of land fill and will recover approximately 3,000 tonnes of steel and foam. Additionally, the facility will recover approximately 1,200 tonne per year of textile material which will be used as a fuel source at a locally based waste to energy company. The proposed operations also provide raw material for future recycling opportunities. These procedures are considered to be valuable to the environmental health of the region and demonstrate significant environmental benefits.

4.8 STATE ENVIRONMENTAL PLANNING POLICY (INFRASTRUCTURE) 2007

State Environmental Planning Policy (Infrastructure) 2007 (SEPP Infrastructure) aims to facilitate the effective delivery of infrastructure across the State. A number of mechanisms are provided under the instrument to achieve this outcome, including providing greater flexibility in the location of infrastructure and service facilities.

Schedule 3 lists the types of development that are defined as Traffic Generating Development. Whilst Schedule 3 does list thresholds for industrial land uses, these thresholds are guided by GFA being proposed. Given the proposal is for change of use only with no additional GFA proposed, the proposal does not require referral to Roads and Maritime Services (RMS) under the provisions of *SEPP Infrastructure*.

4.9 STATE ENVIRONMENTAL PLANNING POLICY NO. 33 – HAZARDOUS AND OFFENSIVE DEVELOPMENT

State Environmental Planning Policy No. 33 – Hazardous and Offensive Development (SEPP 33) aims to determine whether a development is a hazardous or offensive industry and if so ensure that appropriate mitigation measures are employed for those activities.

The proposed use is not considered to entail hazardous or offensive activities as it does not pose risk to human health, life or property or the biophysical environment and will not emit a polluting discharge in a manner which would have significant adverse impact in the locality or on the existing or likely future development on other land in the locality.

Furthermore, the proposal does not include the handling or storage of dangerous chemicals or materials and. The proposal therefore is not considered to entail a hazardous or offensive industry and does not warrant further consideration in this respect.

4.10 STATE ENVIRONMENTAL PLANNING POLICY NO. 55 – REMEDIATION OF LAND

Under the provisions of *State Environmental Planning Policy No. 55 – Remediation of Land* (SEPP 55), where a development application is made concerning land that is contaminated, the consent authority must not grant consent unless:

- (a) *it has considered whether the land is contaminated, and*
- (b) *if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and*
- (c) *if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose.*

The proposal does not entail any physical works but rather seeks to adapt the existing structures on the site for a resource recovery facility. Given the site will continue to be used for industrial-type purposes, existing site conditions are considered to be suitable with no further investigation required.

4.11 FAIRFIELD LOCAL ENVIRONMENTAL PLAN 2013

Fairfield Local Environmental Plan 2013 (FLEP2013) was prepared to meet new State Government guidelines for local planning documents.

The relevant provisions of FLEP2013 as they relate to the subject site are considered below:

Zoning and Permissibility

The subject site is located within the *IN1 General Industrial* zone under the provisions of FLEP2013.

The proposed use of the facility (mattress deconstruction facility) is considered to be consistent with the land use definition of *resource recovery facility* which is permissible with consent in the IN1 zone under the FLEP2013 and includes the following:

resource recovery facility means a building or place used for the recovery of resources from waste, including works or activities such as separating and sorting, processing or treating the waste, composting, temporary storage, transfer or sale of

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recovered resources, energy generation from gases and water treatment, but not including re-manufacture or disposal of the material by landfill or incineration.

As outlined above the *resource recovery facility* land use includes the separating, sorting and transfer of waste/materials consistent with the proposed use of the facility as previously described.

IN1 General Industrial Zone

The objectives of the IN1 General Industrial zone are:

- *To provide a wide range of industrial and warehouse land uses.*
- *To encourage employment opportunities.*
- *To minimise any adverse effect of industry on other land uses.*
- *To support and protect industrial land for industrial uses.*
- *To ensure development is not likely to detrimentally affect the viability of any nearby business centre.*

The proposal is consistent with the objectives of the zone as it will maintain industrial activities within the locality and employment generation with positive economic implications for the local and regional economies. The proposed land use will be contained completely within the subject site and will not exhibit any direct offsite impacts. As such the development will not adversely affect any other sites or land uses including road infrastructure or drainage infrastructure.

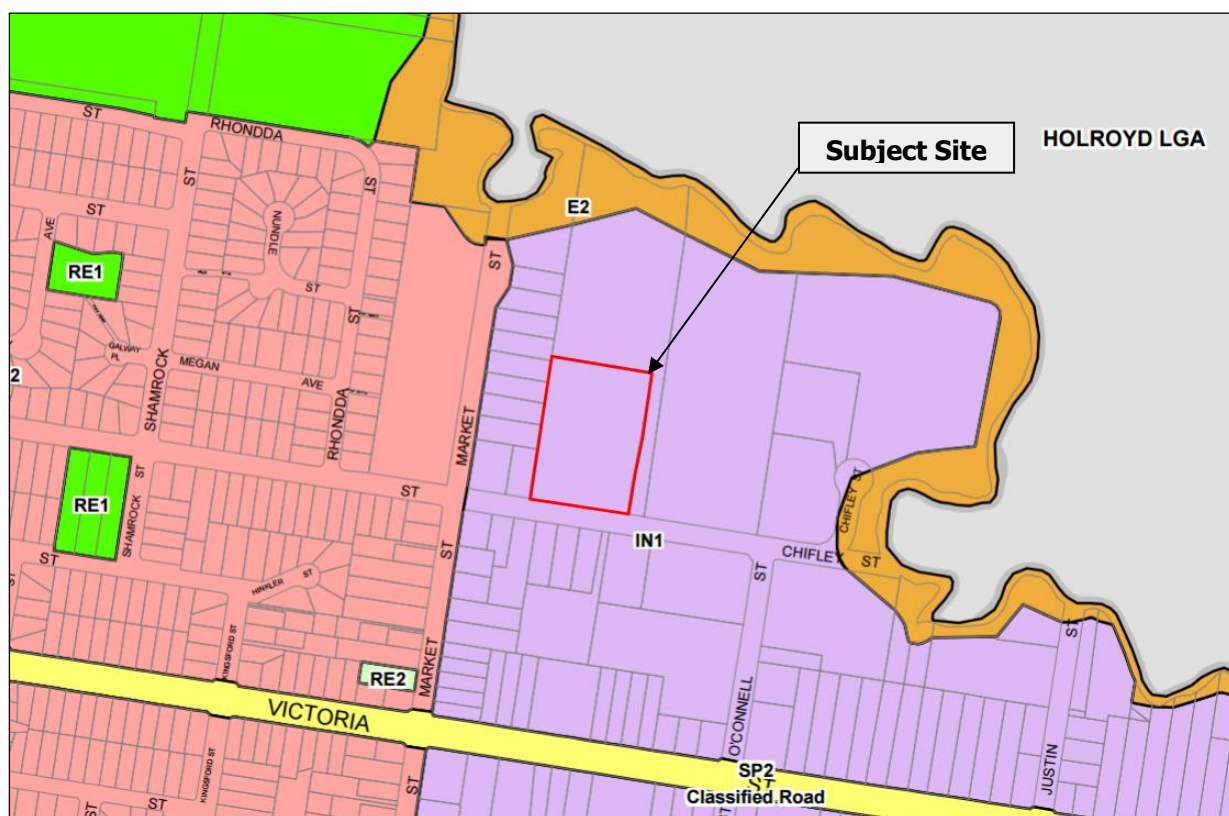


Figure 5: FLEP2013 Zoning Map (NSW Legislation 2016)

Heritage Conservation

The site is not identified in the FLEP2013 as an item of environmental heritage or within a heritage conservation area. The site is located approximately 80m east of an item of local heritage significance being the 'Victorian Georgian Cottage' (I87) at 45 Chifley Street, Smithfield. Given the nature of the proposed use and the fact that no physical works are to be

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carried out, the proposal is not considered to result in any detrimental impact on this item which may affect its heritage significance.

Flood Planning

In accordance with Fairfield City Council's Prospect Creek Flood Planning Map, the subject site is located within a 'Low Flood Risk Precinct'. A detailed Flood Risk Management Report has been prepared by Sparks & Partners and can be found in **Appendix 4**.

The Flood Risk Management Report concludes that *the proposal does not changes the built form of the building and therefore has no effect on the existing flooding regime*. Furthermore, the proposed use will *incorporate a site emergency response plan to ensure the safe evacuation of occupants in a flood event*.

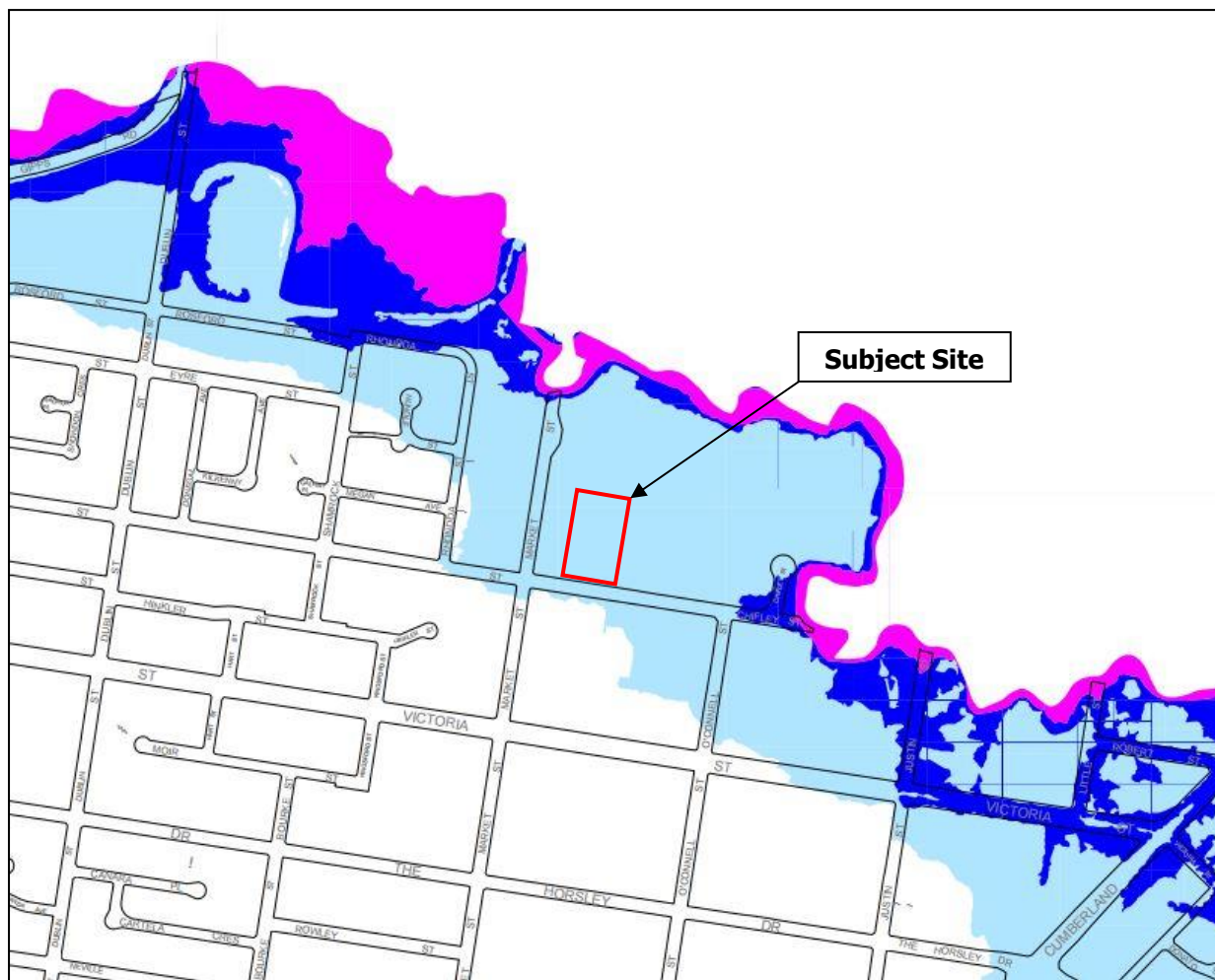


Figure 6: Prospect Creek Flood Plan (Fairfield City Council 2010)

Essential Services

The site has been previously developed and historically utilised for industrial purposes. Accordingly, the site is adequately serviced by all essential services and the proposed land use will not impact upon these existing services.

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5.11 DRAFT ENVIRONMENTAL PLANNING INSTRUMENTS

No Draft Environmental Planning Instruments apply to the proposed development.

5.12 FAIRFIELD DEVELOPMENT CONTROL PLAN 2013

Fairfield Development Control Plan 2013 (FDCP 2013) supplements *Fairfield Local Environmental Plan 2013* and provides more detailed provisions to guide development.

An assessment of the proposal against the relevant provisions of the Fairfield Development Control Plan 2013 (FDCP 2013) has been carried out. Given the proposal is solely for a change of use to the existing facility with no physical works to be carried out, the built form controls of the DCP do not apply to this application. The proposed land use triggers consideration of the following sections:

- Chapter 9: Industrial Development
 - 9.4 Streetscape and Amenity
- Chapter 11: Flood Risk Management
 - Schedule 6 Other Floodplains (including areas affected by Local Overland Flooding)
- Chapter 12: Car Parking, Vehicle and Access Management
 - 12.1 Car Parking Rates

The proposal is considered to achieve the objectives and requirements of the abovementioned sections of the FDCP2013. The applicable controls within these sections have been addressed below:

Table 5: Fairfield Development Control Plan 2013 Compliance Table

Chapter 9: Industrial Development		
9.4 Streetscape and Amenity		
Section	Control	Comment
9.4.4 Hours of Operation	<i>a) Where industrial properties are within 500 metres of residential properties, industrial operating hours will generally be restricted within the range of 7.00am to 6.00pm Monday to Friday and 7.00am to 12.00 noon on Saturdays with no operations on Sunday.</i>	<p>The proposed hours of operation for the facility are <u>6:00am – 4:00pm Monday – Friday</u>.</p> <p>Whilst the proposed starting time (6:00am) is one (1) hour before the permitted hours, this is considered to be a minor departure from this control and not result in any detrimental impacts on surrounding residential land uses. Furthermore, this non-compliance is considered to be offset by an early closing time (4:00pm) being two (2) hours before the permitted closing time. The land use will also not operate on Saturdays which is permitted.</p> <p>In light of the above, the proposed hours of operation are considered to be acceptable for the land use without the need for further acoustic assessment.</p>

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Chapter 11: Flood Risk Management

Schedule 6 Other Floodplains (including areas affected by Local Overland Flooding)

The site is identified as being located in the low risk flood for mainstream flooding and medium risk for local overland flow. As such Flood Risk Management Report has been prepared by Sparks and Partners and provided in **Appendix 4**.

The Flood Risk Management Report addresses the relevant controls of Chapter 11, Schedule 6 of the FDCP2013. Sparks and Partners conclude that *the proposal does not change the built form of the building and therefore has no effect on the existing flooding regime*. Furthermore, the proposed use will *incorporate a site emergency response plan to ensure the safe evacuation of occupants in a flood event*.

In light of the above and outcomes of the Flood Risk Management Report, the proposed change of use is considered to satisfy Chapter 11 of the FDCP2013 for flood risk management.

Chapter 12: Car Parking, Vehicle and Access Management

12.1 Car Parking Rates

Section	Control	Comment
12.1.1 Car Parking Rates (Table 1)	<i>To be determined by a car parking survey of a comparable facility.</i>	<p>The proposed land use will include a maximum of ten (10) staff at any one time. The tenancy is allocated 10 parking spaces for use by TIC and the proposed use will not be subject to visitors or customers to the site. Only product delivery and pickup trucks will be using the site in addition to staff. These trucks will not require permanent parking spaces within the site.</p> <p>In light of the above, the existing parking provisions within the site are considered to adequately cater to the proposed use of the premises as a resource recovery facility.</p>

5.13 DEVELOPMENT CONTRIBUTION PLANS

Development contributions will be paid in accordance with Council's relevant S94 or S94A Contributions Plans, if required.

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PART E CONSULTATION

In response to the SEARs issued for the proposal, the following consultation has been undertaken as detailed in **Table 6** below. Documentary evidence of agency notifications and responses is provided within **Appendix 12**.

Table 6: Consultation Record	
Agency/Council	Consultation Notes
<i>Office of Environment and Heritage</i>	<p>In their email dated 21 April 2017, the Office of Environment and Heritage (OEH) has confirmed that the proposal does not contain any biodiversity, natural hazards or Aboriginal cultural heritage issues that require a formal EOH response.</p> <p>It is noted though the Heritage Division may wish to provide a separate response.</p>
<i>Environment Protection Authority</i>	<p>In their letter dated 3 May 2017, the Environment Protection Authority (EPA) indicates that an Environment Protection Licence (EPL) will not likely be required as the licensing threshold for non-thermal treatment of general waste is 6000 tonnes per year (under Schedule 1 of the POEO Act), yet the proposed facility will only process up to 4200 tonnes of general waste per year.</p> <p>The EPA also notes though that under Schedule 1 of the POEO Act, an EPL would be required if the facility proposes to store more than 1000 tonnes or 1000m³ of general solid waste at the premises at any one time. As the application does not define the maximum amount of waste that will be stored at the premises at any one time, the EPA recommends that the applicant be required to demonstrate in the EIS that it will not breach licensing thresholds.</p> <p>The EPA also recommends that the following environmental impacts be assessed:</p> <ul style="list-style-type: none">▪ Noise impacts – a noise impact assessment in relation to the operating of the foam baler, shredder, peel roller and ducted extraction system should be carried out;▪ Air quality issues – an air impact assessment in relation to air emissions and dust generated from the processing should be carried out;▪ Waste management – the waste process, in terms of where and how waste is going to be stored at the site should to be identified and described, as well the amount of waste to be processed and stored at the Premises at any one time;▪ Fire risk management and containment;▪ Relevant guidelines as listed in Attachment 1 and any relevant industry codes of practice and best practice management guidelines.
<i>Roads and Maritime Services</i>	<p>A consultation letter (Appendix 12) was issued on 10 May 2017 notifying the RMS of the proposal and intension to lodge a DA. The letter welcomed the opportunity to discuss the proposal prior to lodgement a well as during the assessment process. No response has been received from the RMS.</p>

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Table 6: Consultation Record	
Agency/Council	Consultation Notes
<i>Fire & Rescue NSW</i>	A consultation letter (Appendix 12) was issued on 10 May 2017 notifying Fire & Rescue NSW of the proposal and intention to lodge a DA. The letter welcomed the opportunity to discuss the proposal prior to lodgement as well as during the assessment process. No response has been received from the Fire & Rescue NSW.
<i>WaterNSW</i>	In their email dated 28 April 2017, WaterNSW has confirmed that the site is not located in proximity to any WaterNSW land or assets and accordingly WaterNSW has no further requirements or comments.
<i>Fairfield City Council</i>	A consultation letter (Appendix 12) was issued on 10 May 2017 notifying Council of the proposal and intention to lodge a DA. The letter welcomed the opportunity to discuss the proposal prior to lodgement as well as during the assessment process. No response has been received from the Council.
<i>Surrounding owners and occupants</i>	A consultation letter (Appendix 12) was issued on 10 May 2017 notifying the surrounding properties of the proposal and intention to lodge a DA. The letter welcomed the opportunity to discuss the proposal prior to lodgement as well as during the assessment process. No response has been received from the surrounding properties.

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PART F ENVIRONMENTAL RISK ASSESSMENT

6.1 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS

The Secretary's Environmental Assessment Requirements were received on 8 May 2017. The Key Issues include:

- Strategic Context;
- Waste Management;
- Hazards and Risk;
- Air Quality;
- Noise and Vibration;
- Traffic and Transport.

The above matters are addressed in the sections below.

6.2 STRATEGIC & STATUTORY CONTEXT

Refer **Part D** above in respect of the strategic and statutory context of the site.

6.3 WASTE

A Waste Management Plan is provided at **Appendix 5** for the ongoing waste management procedures for the proposed operations including the management and handling of materials following the dismantling of the mattresses. The site's operations will be conducted in accordance with the NSW waste hierarchy which underpins the objectives of the Waste Avoidance and Resource Recovery Act 2001, and follows the principles of waste management through the process of:

- Avoidance – reducing the generation of waste materials.
- Resource recovery – including re-use, recycling, reprocessing and energy recovery.
- Environmentally sound disposal – the least preferred option, but necessary when materials have reached the end of useful life and no other option is available.

As outlined within the Waste Management Plan at **Appendix 5**, the facility will receive and process approximately 4,200 tonnes of waste mattresses annually, equating to 140,000 mattresses (noting that waste mattresses are a form of general non-putrescible waste).

Further, whilst the information provided above refers to 'waste' leaving the site, the mattresses themselves being transported to the site do not qualify as 'waste' under the EPA Regs definition. The mattresses to be transported to the site could potentially still be used and do not contain chemicals, dangerous or hazardous products, or perishables. Furthermore, it is important to note that the mattresses have not been abandoned by the residents and instead SoftLanding acquires the mattresses by contract with Council through a booked or scheduled collection by Council and SoftLanding. Specifically, mattresses will be transported to the site by a fleet of 10 pallet trucks with deliveries taking place between 1-4pm daily.

Once delivered to the site, mattresses will be temporarily stored inside a designated warehouse. The proposed facility will store a maximum of 750m³/tonnes of general solid waste at any one time and therefore does not breach the licensing thresholds under the POEO Act. Accordingly, an EPL will not be required based on the quantities of waste being stored.

Through the site's operations, approximately 3,000 tonnes of steel and foam will be recovered. The recovered steel and foam will be stored inside the warehouse facilities, and bins will be covered with tarpaulins prior to being removed from the warehouse for collection. Importantly, these materials will not be left to stockpile, and will be removed from site on a daily basis.

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Further to the above, steel recovered from the process will be collected immediately into a hook bins (30m³) located within the warehouse facility, and will be collected on a daily basis using a contracted waste service provider. All recovered steel will be sent to a metals recycling facility. Foam recovered from the process will be baled and immediately loaded into a truck for delivery to a local recycling facility where it will be processed further and used in new products.

Additionally, approximately 1,200 tonne of textile material will be recovered on an annual basis. Whilst this material is unsuitable for re-use or recycling, it is however suitable as a feedstock for energy recovery plants. It is proposed that this material will be collected for use as a fuel source at a locally based waste to energy company. To collect this stream the proposed processing facility is designed to automatically separate textile material from the mattresses. Once separated, the material will be diverted onto a conveyer and transported directly to a baling machine, where it will be baled on-site. The baled textile waste will be temporarily stored within the warehouse, following which the bales will be loaded onto trucks for daily transport and delivery to a local waste to energy company. This approach ensures a higher order use of this waste stream, maintaining consistency with the NSW Waste Hierarchy.

An estimated 3 tonne of dust will be captured in the Baghouse (dust extraction system) on an annual basis. The dust collected will be unsuitable for recycling or re-use, and will be disposed to landfill. Handling of this material on-site will involve automated capture of the dust into a hopper, which will then be transferred into covered 3m³ bins. These bins will be stored inside the warehouse and will be collected by a contracted waste service provider as required.

Overall, the processing of materials by the proposed facility will promote environmental benefits through reduced landfill, energy savings, and lower carbon emissions. Each year the plant will deliver the following environment benefits:

- Avoided landfill space – 105,000 cubic meters.
- Energy saved in steel recycling – 196,000 kWh.
- Avoided greenhouse emissions – 268.5 TCO₂.

Full details of waste management are provided within the Waste Management Plan at **Appendix 5**.

6.4 HAZARDS AND RISK

6.4.1 DANGEROUS AND HAZARDOUS GOODS AND MATERIALS

As confirmed within the SEPP 33 assessment summarised in **Section 4.8** of this EIS, the proposed resource recovery facility does not constitute hazardous or offensive industry.

The proposed use is not considered to entail hazardous or offensive activities as it does not pose risk to human health, life or property or the biophysical environment and will not emit a polluting discharge in a manner which would have significant adverse impact in the locality or on the existing or likely future development on other land in the locality.

Furthermore, the proposal does not include the handling or storage of dangerous chemicals or materials and. The proposal therefore is not considered to entail a hazardous or offensive industry and does not warrant further consideration in this respect.

6.4.2 FIRE RISK MANAGEMENT AND CONTAINMENT

A Fire Risk Management and Containment Strategy has been prepared and is provided at **Appendix 8**. The assessment considers all operational aspects of the site that present risks in regard to ignition of flammable and combustible materials, and the potential ensuing consequences.

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Importantly, all key systems and services will be maintained according to the performance standards required at the facility. This includes, but is not limited to, ensuring:

- Fire systems are maintained and tested in accordance with relevant Australian Standards (AS2118.1).
- Regular maintenance of plant and equipment is performed and scheduled as per manufacturer's specifications.
- Critical site services testing and maintenance (including the transformer, warehouse lighting, circuit boards) be conducted as per the appropriate performance standards and/or recommendations based on expert review.
- Site emergency procedures are maintained to ensure systems and people are prepared for emergency events that may involve fire.

More specifically, identified fire hazards include:

- Stored mattresses inside the warehouse;
- Dust and mattress shred from mattress processing;
- Gas cylinders for forklifts;
- Electrical equipment in the administration area;
- Site electrical transformer;
- Fire at a neighbouring facility.

Within **Appendix 8**, possible causes and consequences associated with each identified hazard have been outlined and containment protection measures devised. The implementation of these containment protection measures will ensure the effective management and mitigation of risk.

6.4.3 FLOOD RISK

The site is identified as being located in the low risk flood for mainstream flooding and medium risk for local overland flow. As such Flood Risk Management Report has been prepared by Sparks and Partners and provided in **Appendix 4**.

The Flood Risk Management Report addresses the relevant controls of Chapter 11, Schedule 6 of the FDCP2013. Sparks and Partners conclude that *the proposal does not change the built form of the building and therefore has no effect on the existing flooding regime*. Furthermore, the proposed use will *incorporate a site emergency response plan to ensure the safe evacuation of occupants in a flood event*.

In light of the above and outcomes of the Flood Risk Management Report, the proposed change of use is considered to satisfy the requirements of the FDCP2013 and SEARs as they relate to flood risk management.

6.5 AIR QUALITY

The proposed resource recovery facility will undertake operations relating to the storage and processing of mattresses and will not generate any significant air emissions or odour, as confirmed within the Air Quality and Odour Assessment at **Appendix 6**.

Air emissions resulting from the proposed operations relate to dust from mattress processing, road dust, and greenhouse emissions from energy use associated with transportation fuel emissions.

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Management measures proposed to avoid any significant sources of air emissions include:

- Installing dust capture technology for the mattress recycling processes. Specifically, dust-laden air generated through plant operations will be drawn into a 'Baghouse' which will remove dust particles. The air handling capacity of the baghouse is 21,200m³ – 23,800m³ per hour, and the baghouse will be automatically cleaned through pulsing compressed air through the bags and collecting waste material in a hopper.
- Ensuring traffic accessing the site travels on sealed roads to ensure no road dust is generated. All vehicles accessing the site will do so via the existing road network which comprises sealed roads and upon entering the site will utilise the existing hardstand. Traffic associated with the proposed operations will generally avoid residential streets and will be absorbed by the main routes envisaged to carry traffic associated with the industrial precinct.
- Monitoring energy use on site and minimising associated greenhouse gas emissions. Greenhouse gas emissions for the proposed operations will be as a result of electricity usage (stationary energy used for lighting, plant and equipment, office heating and cooling and office equipment) and transportation fuel (light vehicles, trucks and a forklift). Efficient use of energy will be a key management strategy for the proposal, and will be carefully monitored both from a cost viewpoint as well managing the greenhouse emissions profile for the site.

Further to the above, mitigation measures to be implemented include:

- Transport Greenhouse Emissions - there is limited opportunity to improve fuel efficiency for the current vehicle fleet, however in the future a purchasing policy may be adopted for evaluating more fuel efficient vehicles. Additionally, on-site strategies will involve shutting-off vehicle motors rather than leaving motors idling.
- Electricity Consumption - opportunities to improve energy efficiency at the site would involve assessing building lighting and determining the savings benefits of changing to more energy efficient lighting systems. Other opportunities could include assessing office practices, and opportunities to introduce further efficiency measures regarding office equipment and heating and cooling systems. In addition to these measures a review the mattress processing plant (including opportunities for turning off motors and conveyor systems when not required) would also be undertaken.
- Emissions from Mattress Fires - mattresses in their natural state do not emit odour, dust or air pollutants. However, in the event of a fire at the site toxic smoke may be released. The sites overall fire risk management and containment measures are outlined in section 6.4.2 above.

Full details are provided within the Air Quality and Odour Assessment at **Appendix 6**.

6.6 NOISE AND VIBRATION

The site is located within an established industrial precinct and the proposed operations for a resource recovery facility are highly compatible with surrounding industrial facilities. The proposal is also compatible with other surrounding land uses, given their considerable separation from the site. Specifically, the nearest residential receivers are separated from the site by a distance of approximately 130m and the buffers provided by existing industrial development along Chifley Street.

Furthermore, the proposed use does not include unreasonable hours of operation (Monday – Friday: 6am – 4pm).

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As detailed in the Acoustic Support Letter at **Appendix 7**, typical noise generating activities associated with the proposed development will include truck deliveries and the operation of equipment involved in cutting and dismantling the mattresses (e.g. conveyor belt system and cutting and shredding machines).

Based on the nature of the proposed operations and character of the surrounding context, the proposed development will be able to achieve compliance with the noise emission criteria of the EPA Industrial Noise Policy (outlined below), with the implementation of suitable acoustic treatments and/or management controls.

Table 7: Industrial Noise Policy Amenity Criteria

Type of Receiver	Indicative Noise Amenity Area	Period/Time	Recommended LAeq Noise Level dB(A)Leq(period)
Nearby Residences	Suburban	Day (7am-6pm)	55
		Evening (6pm-10pm)	45
		Night (10pm-7am)	40
Commercial Premises	All	When in use	65
Industrial Premises	All	When in use	70

Further to the above, the required acoustic treatments and/or management controls required to achieve compliance with the noise emission requirements will be determined as part of a detailed acoustic assessment. The assessment will involve conducting long term unattended background noise monitoring at the nearest residential receivers (to determine the Intrusiveness criteria for the site) and using attended noise measurements of typical noise generating activities at TIC Group's existing warehouse facility.

In light of the above, it is considered reasonable to conclude that the proposed land use will not result in any intrusive noise impacts to surrounding land uses. All the same, a full noise impact assessment is currently being undertaken and will be submitted in support of this EIS.

6.7 TRAFFIC AND TRANSPORT

The proposed resource recovery facility will utilise the existing structures on the site and will undertake operations that closely resemble the previously-approved warehouse and industrial use operating on the site. Accordingly, the traffic generation resulting from the proposed use will be generally consistent with the previous approval and other facilities operating within the Smithfield industrial precinct. Therefore, the existing road network will suitably accommodate vehicles associated with the proposed operations without requiring any road upgrades and without the safety or function of the road network being compromised.

Further to the above, access to the site will be facilitated by the existing driveways. Specifically, access for all vehicles to the site is facilitated from Chifley Street by a driveway in the central section of the frontage and a Right of Way corresponding with the eastern site boundary.

The majority of vehicles accessing the site are expected to utilise the roads passing through the industrial precinct, Cumberland Highway and the M4 Western Motorway. Accordingly, traffic associated with the proposed operations will generally avoid residential streets and will be absorbed by the main routes envisaged to carry traffic associated with the industrial precinct.

Additionally, car parking for the proposal will be accommodated by the existing ten (10) spaces located on the hardstand adjoining the warehouse to the south. A maximum of ten (10) staff will be employed at any one time and, given that no visitors will access the site, the existing 10 spaces will adequately service the development with no reliance on street parking.

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Product delivery and pickup trucks will also access the site, however will not require permanent parking, instead being suitably accommodated by the site's loading zones.

In light of the above, the existing road network, sites access, car parking and loading zones are considered to adequately cater to the proposed use of the premises as a resource recovery facility.

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PART G MANAGEMENT AND MITIGATION MEASURES

by TIC (Mattress Recycling) Pty Ltd
in relation to Proposed Resource Recovery Facility (Mattress Deconstruction Facility)
at 29 Chifley Street, Smithfield (Lot 11 in DP 805091).

TIC (Mattress Recycling) Pty Ltd will undertake the proposed change of use for the purposes of a resource recovery facility (mattress deconstruction facility) in accordance with the following:

The following defines some of the terms and abbreviations used in this statement:

Approval	The Minister's approval of the Project
BCA	Building Code of Australia
Council	Fairfield City Council
Department	Department of Planning and Environment
Secretary-General	Secretary-General of the Department (or delegate)
EIS	Environmental Impact Statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
Project	The development as described in the EIS
Site	Land to which the project application applies
WorkCover	NSW WorkCover

SPECIFIC ENVIRONMENTAL MANAGEMENT & MITIGATION MEASURES

Commitment to Minimise Harm to the Environment

1. TIC (Mattress Recycling) Pty Ltd will implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the operation of the project.

Occupation Certificate

2. TIC (Mattress Recycling) Pty Ltd will ensure an Occupation Certificate is obtained prior to the occupation of the facilities.

Terms of Approval

3. TIC (Mattress Recycling) Pty Ltd will carry out the project generally in accordance with the:
 - a) Environmental Impact Statement;
 - b) Drawings prepared by Axis Architectural;
 - c) Management and Mitigation Measures;
 - d) Any Conditions of Approval.
4. If there is any inconsistency between the above, the Conditions of Approval shall prevail to the extent of the inconsistency.
5. TIC (Mattress Recycling) Pty Ltd will ensure compliance with any reasonable requirement/s of the Secretary-General of the Department of Planning and Environment arising from the Department's assessment of:

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- a) Any reports, plans, programs, strategies or correspondence that are submitted in accordance with this Approval; and
- b) The implementation of any recommended actions or measures contained in reports, plans, programs, strategies or correspondence submitted by the Project Team as part of the application for Approval.

Operation of Plant and Equipment

6. TIC (Mattress Recycling) Pty Ltd will ensure that all plant and equipment used on site is maintained and operated in proper and efficient manner, and in accordance with relevant Australian Standards.

Flooding

7. TIC (Mattress Recycling) Pty Ltd will ensure that the Site Emergency Flood Response Plan prepared by Sparks + Partners is implemented and the prescribed procedures adhered to.

Waste

8. TIC (Mattress Recycling) Pty Ltd will ensure that all waste generated on site during operation is managed, re-used, recycled and recovered in accordance with the Waste Management Plan prepared by Equilibrium. All waste will be collected by licensed contractor and transferred to licensed facilities.

Air Quality

9. TIC (Mattress Recycling) Pty Ltd will ensure that air quality and odour are effectively managed in accordance with the Air Quality Impact Assessment prepared by Equilibrium. Specifically the following will be implemented:
 - a) A dust capture system will be installed in the warehouse;
 - b) All vehicles accessing the site will do so via sealed roads and hardstand;
 - c) On-site energy use will be monitored.

Noise

10. TIC (Mattress Recycling) Pty Ltd will ensure that suitable acoustic treatments and/or management controls are implemented in accordance with the recommendations of the detailed Acoustic Assessment prepared by Acoustic Logic.

Fire Risk Management

11. TIC (Mattress Recycling) Pty Ltd will ensure that fire hazards are managed and contained in accordance with the Fire Risk Management and Containment Strategy prepared by Equilibrium.
12. All key systems and services will be maintained according to the performance standards required at the facility. This includes, but is not limited to, ensuring:
 - a) Fire systems are maintained and tested in accordance with relevant Australian Standards (AS2118.1).

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- b) Regular maintenance of plant and equipment is performed and scheduled as per manufacturer's specifications.
- c) Critical site services testing and maintenance (including the transformer, warehouse lighting, circuit boards) be conducted as per the appropriate performance standards and/or recommendations based on expert review.
- d) Site emergency procedures are maintained to ensure systems and people are prepared for emergency events that may involve fire.

Fire Safety

13. A current Annual Fire Safety Statement will be held at all times.

PART H PROJECT JUSTIFICATION

The proposal is justified in the context of environmental, social and economic terms and is compatible with the locality in which it is proposed.

This application is lodged on the basis of:

Supporting State, Regional and Local planning objectives

The proposal is consistent with the objectives, provisions and strategies outlined within *A Plan for Growing Sydney*, the *draft South West District Plan*, *Fairfield Local Environmental Plan 2013* and *Fairfield Development Control Plan 2013*.

Appropriate use of an approved site

The proposal will adapt the current warehouse and associated structures on the site for a resource recovery facility and therefore makes efficient and productive use of industrial land and pre-existing infrastructure. By facilitating the proposed use, this application promotes employment-generating development and protects the role of Sydney's industrial precincts. Accordingly, the proposal accords with the relevant strategic and statutory plans applicable to the site and region.

Environmental impacts have been minimised

Specialist consultants have assessed the risks and determined that the development can be undertaken with minimal environmental impacts. No significant risk to the locality is to result from the proposal.

Compatibility with surrounding development

The proposed use is highly compatible with the surrounding context which is dominated by similar industrial and warehouse facilities. The nearest residential receptors are located approximately 100m south-west of the site and accordingly adequate separation and buffering will prevent any adverse impact from occurring as a result of the proposed use on the subject site.

Ecologically Sustainable Development

The principles of ecologically sustainable development as outlined in Clause 7(4) of the EPA Regulations are addressed as follows:

- *Precautionary Principle*

No unmanageable threat or irreversible damage to the environment has been identified in relation to the proposal.

- *Inter-generational Equity*

No unreasonable use of resources, affectation of environmental processes or prevention of the use of land for future generations will occur from the proposal.

- *Conservation of Biological Diversity and Ecological Integrity*

The proposed facility will protect the environment given only land that has been previously developed will be affected. No vegetation removal is required and no areas of biodiversity will be impacted.

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- *Improved Valuation, Pricing and Incentive Mechanisms*

The proposal seeks to implement measures to avoid, contain and address any associated waste or pollution through appropriate design and management.

Accordingly, the proposed resource recovery facility is suitably justified in that it will positively support the sustainable use of land whilst not prompting any adverse environmental, economic or social outcomes.

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PART I CONCLUSION

The proposed development for a resource recovery facility (mattress deconstruction facility) at 29 Chifley Street, Smithfield, is permissible with consent pursuant to *Fairfield Local Environmental Plan 2013* (FLEP2013). Similarly, the proposal accords with the objectives and provisions of the FLEP2013 and *Fairfield Development Control Plan 2013* (FDCP2013).

This EIS responds to the Secretary's Environment Assessment Requirements (Reference: SEAR 1149) and provides an assessment of the proposal against relevant environmental planning instruments and policies including *Fairfield Local Environmental Plan 2013* (FLEP2013). The assessment finds that the proposal is consistent with the objectives and controls of the relevant instruments and policies. No significant adverse environmental, economic or social impacts have been identified as likely to arise from the proposed development. Rather, the proposal will provide for positive impacts associated with the adaption of existing industrial/warehouse facilities for a resource recovery facility, the provision of employment generating development and the recycling of materials that would otherwise be disposed of as landfill.

In summary, it is considered that the proposal should warrant a positive assessment for the following compelling reasons:

- The proposed use of the site for a mattress deconstruction facility accords with relevant strategic plans, SEPPs, the FLEP2013 and the FDCP2013.
- As required by the SEARs (Reference: SEAR 1149), the proposal is consistent with the strategic and statutory context, and will result in no unacceptable impacts in terms of waste, hazards and risk, air quality, noise and vibration, and traffic and transport.
- The proposal is highly compatible with surrounding land uses including in terms of amenity, visual appearance and function.
- In accordance with the objectives of the project, the proposed design will support employment generation, facilitate the productive use of land, avoid adverse environmental and amenity impacts, generate broad social and environmental benefits, and effectively integrate with the surrounding context.
- The proposal will make use of existing facilities within an industrial area, therefore supporting the efficient use of land and infrastructure.
- Through the facility's recovery and recycling of waste, it is estimated that annually 105,000m³ of land fill will be avoided, 3,000 tonnes of steel and foam will be recovered, and 1,200 tonne per year of textile material will be recovered. The proposed operations also provide raw material for future recycling opportunities. These procedures are considered to be valuable to the environmental health of the region and demonstrate significant environmental benefits.
- The proposal also provides significant community and social benefit as TIC (Mattress Recycling) Pty Ltd intend on subletting part of the tenancy to Soft Landing, being a social enterprise which employs those who have been out of the workforce for an extended period of time or are finding it difficult to break into the workforce.

The proposed development is permissible within the zone and is compatible with the zone objectives. As stipulated previously in this report, the matters for consideration under S.79C of the *Environmental Planning and Assessment Act 1979* and the SEARs have been satisfactorily addressed demonstrating the development is compatible with the surrounding environment.

Accordingly, it is recommended that Council grant development consent to the proposal.

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Appendix 1

SEARs

DRAFT

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Appendix 2**Survey Plan**

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Appendix 3 Site Plan and Warehouse Plan

Appendix 4

Flood Management Plan

Appendix 5

Waste Management Plan

Appendix 6

Fire Risk Management and Containment Strategy

Appendix 7

Air Quality Impact Assessment

Appendix 8

Noise and Vibration Assessment Report

Appendix 9

Annual Fire Safety Statement

Appendix 10

TIC Fact Sheet

Appendix 11

Section 149 Certificate

Appendix 12 Evidence of Consultation and Agency Responses