Environmental Impact Statement Construction and Demolition Waste Management Facility

115-119 Cowpasture Road, Wetherill Park

A submission to Fairfield City Council on behalf of GLC Civil, trading as Pronto Bins

03 December 2019

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Acknowledgements

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Disclaimer

This report has been prepared by Mike Ritchie and Associates (trading as MRA Consulting Group (MRA)) for Pronto Bins in accordance with the terms and conditions of appointment. MRA (ABN 13 143 273 812) cannot accept any responsibility for any use of or reliance on the contents of this report by any third party.

Declaration

This Environmental Impact Statement has been prepared by MRA Consulting Group:

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In respect of:

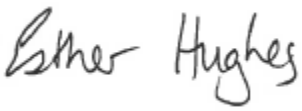
Proposal Title	Applicant name and address	Land to be developed
Environmental Impact Statement – Construction and Demolition Waste Sorting Facility **115-119 Cowpasture Road, Wetherill Park**	John Habib GLC Civil Pty Ltd 115-119 Cowpasture Rd., Wetherill Park NSW 2164	Unit 1 115-119 Cowpasture Rd., Wetherill Park NSW

Pursuant to clause 6(f), Part 3, Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*, I declare that this Environmental Impact Statement (EIS):

- Has been prepared in accordance with Schedule 2 of the Environmental Planning and Assessment Regulation 2000;
- Contains all available information relevant to the environmental assessment of the development to which this EIS relates; and
- Contains information that is neither false nor misleading.

Name: Esther Hughes

Position: Senior Consultant – Planning and Approvals

Signature: 

Executive Summary

GLC Civil Pty Ltd (trading as Pronto Bins) requires planning consent for the development of a Construction and Demolition (C&D) waste management Facility at 115-119 Cowpasture Rd, Wetherill Park. Pronto Bins, the proponent, is a skip bin operator who proposes to improve operations by sorting and recovering materials from the C&D waste stream. The proposed development will separate C&D materials for reuse and recovery, including paper/cardboard, mixed plastics and mixed metals from the C&D sector for sale to recycling companies off-site. The anticipated maximum volume of waste to be processed each year is 20,000 tonnes.

The strategic need for the Proposal is driven by NSW and federal government policies, strategies and programs, that are intended to reduce waste to landfill and increase recycling and resource recovery in NSW. The Proposal will also generate long term job opportunities for the local community and facilitate the efficient removal and processing of C&D waste.

This Environmental Impact Statement (EIS) is submitted to Fairfield City Council on behalf of Pronto Bins in support of a Development Application to permit processing of the proposed waste streams at the anticipated volumes. It gives a comprehensive analysis of the effects of the Proposal with regard to air quality, emissions to stormwater, noise, traffic and access, local amenity, ecology and heritage. The findings of the analysis indicate that no significant environmental effects would result from the proposed development, providing that the safeguards and management measures outlined in this EIS have been implemented.

The Proposal to install and operate a C&D processing facility is deemed to meet the requirements of the relevant planning instruments and legislation.

This EIS has been prepared by MRA Consulting Group (MRA) on behalf of Pronto Bins in accordance with:

- Secretary's Environmental Assessment Requirements (SEARs) 1226 issued on 5 June 2018;
- The Environmental Planning and Assessment Act 1979; and
- Schedule 2 of the Environmental Planning and Assessment Regulation 2000.

The Site

The site address is part of Lot 1 in DP830767. The area which will be utilised for C&D waste processing is approximately 1,500 m^2 in size, within an existing industrial shed, ,

Development Proposal

The current consent, DA 6928-00100, is for 'warehousing of Bathroom & Building Supplies (toilet systems and handrails, etc.)'. Approval is sought for change the use of the site to sort and recover C&D waste collected by the company's existing skip bin operation and to approve the installation of two portable type buildings.

The proposed facility would, once operational, be capable of undertaking the following activities:

- Process up to 20,000 tpa of C&D waste.

The facility would operate the following process:

- Receive mixed C&D waste from current skip bin operations;
- Sort and recover material for reuse and recycling; and
- Distribute the recovered and residual material offsite.

To permit the operation of the C&D waste processing facility development consent is required for change of use, considering that the waste processing facility has potential to affect the amenity of the neighbourhood if potential impacts are not managed.

The proposal also requests consent for the installation of two portable buildings. The buildings have already been installed and are included in this application to ensure the consent document is consistent. There would be no changes to the building footprint and no construction activities would be required.

Impact Assessment

This EIS addresses the SEARs, and includes an assessment of:

- Air Quality and Odour;
- Noise and Vibration;
- Water;
- Soils and Contamination;
- Waste;
- Fire and Hazards;
- Traffic and Transport;
- Visual Amenity;
- Socio-economic Impacts
- Ecology;
- Heritage;
- Consultation with relevant stakeholders including the community; and
- Ecologically sustainable development.

The assessment of the above mentioned specific matters within the EIS comes to the conclusion that:

- The Proposal demonstrates consistency with the relevant planning instruments and addresses the issues identified in the SEARs;
- The site is suitable for the proposed development and land use as it is complimentary to the overall Wetherill Park industrial area and does not result in any undue impacts;
- The Proposal's environmental impacts can be appropriately mitigated as outlined under Sections 8 and 10 of this report; and
- The Proposal will have a positive economic and social impact providing employment opportunities in the area.

Mitigation Measures

The EIS identifies appropriate mitigation measures to control the environmental impacts of the proposed development during both the construction and ongoing operation of the facility. The mitigation measures address issues such as air quality and odour, noise, soil and water, traffic and transport, visual amenity, indigenous and non-indigenous heritage, biodiversity, operations and waste management, fire and hazard impacts and ecologically sustainable development (ESD). A brief overview of the aforementioned components is set out as follows:

Air Quality

The Air Quality assessment completed by Todoroski Air Sciences (2018) concludes that the potential for odour emissions is low, as the input materials are limited to non-putrescible C&D waste.

The report also assessed potential dust impacts of the proposed facility. An assessment of cumulative 24-hour PM_{10} and $PM_{2.5}$ was undertaken at each assessed receptor location. The results indicate that it is unlikely that cumulative impacts would arise due to the project.

Overall, it is concluded that the operations at the site are unlikely to have a significant impact on the local or regional air quality.

Noise

The Noise Impact Assessment undertaken by Koikas (2018) concludes that even when the proposed facility will be operating at its peak capacity of 20,000 tpa, the noise level is predicted to be acceptable under standard EPA guidelines and would not exceed the project noise trigger level of the Noise Policy for Industry (NPI) at all residential and industrial receptors.

Water

A Surface Water Management Report was completed by Storm Consulting in August 2018. Potential impacts would be mitigated by implementing measures to filter runoff at stormwater inlets. As a result, there would be negligible impacts to surface and/or groundwater as a result of the Proposal.

The results of investigations by Storm Consulting (2018) indicate that there would be no impact to the site as a result of a 5 year or 100-year Average Recurrence Interval (ARI) event. There would also be no flood incursion to the warehouse.

Soil and Contamination

The Proposal would not require soil disturbance and would not result in discharge to land or groundwater. No geotechnical assessment is therefore necessary due to the low risk of soil contamination, erosion or sedimentation.

Waste

According to the analysis in this report, the management of waste would result in improved resource recovery and general diversion from landfill at a State level. Site management will provide for litter clean up.

Fire and Hazards

The storage of hazardous substances and combustible materials would be managed according to Australian Standards *AS3745 – 2010 Planning for emergencies in facilities and AS1940:2004 - The storage and handling of flammable and combustible liquids* and the *Building Code of Australia* to minimise any associated risk. With the implementation of standard measures and the provision of firefighting equipment, the overall risk is minimal.

Traffic and Transport

A Traffic Impact Assessment Report was prepared by EB Traffic Solutions. The report indicates that the site has capacity to accommodate trip generation as a result of the proposal, the provision of onsite car parking is adequate to accommodate staff and visitors, local intersections would not be substantially affected by additional vehicle movements to and from the facility and the site access and turning space can accommodate vehicles up to the size of a semi-trailer. Therefore, the provisions fully satisfy the needs of the Proposal.

Visual Amenity

This report indicates that the activities and operations associated with the Proposal will have a negligible visual impact on people living in or travelling through the landscape surrounding the proposed C&D sorting facility. Views toward the site would remain unchanged and the proposed activities and lighting would not affect any sensitive receptors.

Ecology

No vegetation would be removed for the proposal and therefore there would be no impacts on the habitat of native fauna.

Indigenous Heritage

Due to previous disturbance of the site, no proposed excavation works and the implementation of mitigation measures identified in this report, the risk to indigenous heritage is low.

Non-Indigenous Heritage

The Proposal is unlikely to impact on places, buildings, landscape or movable heritage items. The Proposal is not located near any other culturally significant places, buildings, landscape or movable items that are likely to have heritage significance. Therefore, the residual risk to non-indigenous heritage is low.

Ecologically Sustainable Development

The proposed development would not pose a serious risk of irreversible damage. It would result in overall benefit to future generations through increased resource recovery and therefore preservation of natural resources. Biological diversity and ecological integrity would not be affected. The waste regulatory system and waste market ensures that there are appropriate disincentives for pollution and incentives for the purchase of sorted products for recycling.

DCP Assessment

The EIS addresses the Fairfield Citywide Development Control Plan (DCP – 2013) and demonstrates compliance according to council specifications related to the design, construction and operation of the proposed development.

Conclusion

The EIS addresses the SEARs and demonstrates that the impacts of the Proposal can be satisfactorily mitigated. As demonstrated in the EIS, the Proposal is justified and warrants approval by the consent authority.

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Glossary

Acronym	Description
AHIMS	Aboriginal Heritage Information Management System
AHIP	Aboriginal Heritage Impact Permit
AHD	Australian Height Datum
BAU	Business as usual
CIV	Capital Investment Value
CPM	Carbon Pricing Mechanism
C&D	Construction and Demolition (waste)
DA	Development Application
DAP	Direct Action Plan
DCP	Development Control Plan
DEC	Former NSW Department of Environment and Conservation (now Office of Environment and Heritage)
DECC	Former NSW Department of Environment and Climate Change (now Office of Environment and Heritage)
ECS	Engineering Construction Specifications
EDS	Engineering Design Specifications
EIS	Environmental Impact Statement
EPA	Environment Protection Authority (NSW)
EP&A Act	Environmental Planning and Assessment Act 1979
EP&A Regulation	Environmental Planning and Assessment Regulation 2000
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999
EPL	Environment Protection Licence
ESD	Ecologically Sustainable Development
FCC	Fairfield City Council
IMS	Integrated Management System
ISEPP	Infrastructure SEPP 2007
LEP	Local Environment Plan
MRA	MRA Consulting Group
MRF	Materials Recovery Facility
MRV	Medium rigid vehicles
MSW	Municipal Solid Waste
NES	National Environmental Significance
OEH	NSW Office of Environment and Heritage
OHS	Occupational Health and Safety
OU	Odour Units

Acronym	Description
PEP	Protection of the Environment Policy
PEA Act	Protection of the Environment Administration Act 1991
PCRF	Paper and Cardboard Recovery Facility
PoEO Act	Protection of the Environment Operations Act 1997
RMS	Roads and Maritime Services
SAC	Site Assessment Criterion
SCD	Stormwater Containment Dam
SEE	Statement of Environmental Effects
SEPP	State Environmental Planning Policy
SBMP	Site Based Management Plan
SOER	Specific Odour Emission Rates
tpa	Tonnes per annum
vpd	Vehicles per day
WARR Strategy	Waste Avoidance and Resource Recovery Strategy 2014
WM Act	Water Management Act 2000

1. Introduction

Pronto Bins is proposing to develop a Construction and Demolition (C&D) waste sorting facility at 115-119 Cowpasture Road, Wetherill Park. This facility will complement Pronto Bin's existing skip bin collection business which services the Sydney Metropolitan Area (SMA) and is based at the same site.

Current operations include the collection of dry, inert, C&D materials, sourced primarily from construction sites, and the redistribution of this material to other facilities for final disposal. Since there is limited resource recovery capacity potentially recoverable material is currently disposed and subsequently valuable resources are lost to the economy. The proposed additional operation includes sorting of incoming C&D by type to remove recyclables from the waste stream. Pronto Bins is only collecting C&D and therefore no food or other putrescible wastes would be included in the input stream. Sorted materials would be transported to recycling facilities for further processing while residuals would be disposed of at a licensed landfill. The proposed operations would improve recovery rates, reduce disposal to landfill and provide needed infrastructure for processing of surplus construction industry materials.

The facility would process up to 20,000 tpa of dry, inert materials. In order to commence operations immediately, manual sorting is proposed, with the assistance of low technology machinery such as front - end loaders and excavators. This method is expected to recover approximately 60% of the incoming stream. Over time, Pronto Bins proposes to install an automated sorting system to increase efficiency and further improve the recovery rate. Site plans showing the layout of plant and equipment are included in Appendix A.

1.1 Approvals and Licences

The Proposal would require a licencing under Schedule 1 of *the Protection of the Environment Operations (PoEO) Act 1997*, for a resource recovery facility within the regulated area which processes over of 6,000 tpa of general waste. The application is therefore classed as Integrated Development.

According to Schedule 3 of the *Environmental Planning and Assessment (EP&A) Regulation 2000,* the Designated Development threshold for waste management facilities which handle demolition material is 30,000 tpa, which is not triggered by the proposed volume of 20,000 tpa. However, other triggers in the EP&A Act relate to the location of a facility, one of these being within 250 metres of a dwelling and likely to significantly affect the amenity of the neighbourhood. The site is approximately 130 metres from the nearest dwelling and therefore, the Proposal is Designated Development requires an Environmental Impact Statement (EIS) to accompany the application.

1.2 Objectives

The objective of the development application is to apply for consent for:

- The use of the site as a waste processing facility, with processing capacity of up to 20,000 tpa of dry, inert waste; and
- The installation of two demountable buildings.

Environmental and social objectives are to:

- Apply a life-cycle approach to the disposal of waste through recovery of materials in preference to disposal;
- Achieve best practice environmental outcomes for the management of dust, noise and stormwater;
- Abide by the 'good neighbour' principle to achieve community acceptance; and
- Provide opportunities for local employment.

1.3 Scope of the EIS

The Secretary's Environmental Assessment Requirements (SEARs) were received on 5 June 2018 and have been addressed throughout this EIS.

Furthermore, this EIS includes the following elements, as required by Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*:

- Summary;
- Statement of objectives;
- Analysis of feasible alternatives;
- An assessment of the environmental impacts of the development, including description, likely impact, mitigation measures and list of approvals required;
- Compilation of mitigation measures; and
- Justification of the development.

This EIS also provides an assessment with consideration of:

- The matters for consideration under Section 4.15 of the *Environmental Planning and Assessment Act 1979* (EP&A Act);
- The Fairfield Local Environmental Plan 2013 (Fairfield LEP); and
- The Fairfield Citywide Development Control Plan 2013 (Fairfield DCP).

It also sets out measures to be taken to mitigate any likely adverse impacts of the development.

1.4 Secretary's Environmental Assessment Requirements

The NSW Department of Planning and Environment, NSW Environment Protection Authority (EPA) and Roads and Maritime Services (RMS) have provided their specific requirements with reference to air, water, noise, waste management, transport and access.

Responses from WaterNSW and The Rural Fire Service were not received within the designated response time. Consultation with WaterNSW and Rural Fire Services is summarised in Section 6.

A full copy of the SEARs and other government agency responses are provided in Appendix B of this EIS.

1.5 Specialist Studies

The following specialist studies have been referred to throughout this report:

- Todoroski Air Sciences (2018), Air Quality Impact Assessment Pronto Bins Wetherill Park.
- Koikas Acoustics (2018), Acoustic Report for Development Application, 115 Cowpasture Rd Wetherill Park.
- Storm Consulting (2018), Surface Water management Report 115-119 Cowpasture Rd, Wetherill Park.
- EB Traffic Solutions (2018), 115-117 Cowpasture Rd Traffic Impact Assessment Report.

2. Proposal Need

2.1 Strategic Need

The strategic need for the development is driven by NSW and federal government policies, strategies and programs. These were developed due to the need to increase recycling and resource recovery in NSW to preserve valuable space in landfills, prioritise the use of recovered resources over virgin material and work towards a sustainable future.

The NSW Government administers the waste regulatory framework through the State's primary environment protection legislation, the *Protection of the Environment Operations Act 1997*, the *Waste Avoidance and Resource Recovery Act 2001* (WARR Act) and the *Protection of the Environment Operations (Waste) Regulation 2014*. These principal statutes contain the requirements for the managing, storing, transporting, processing, recovering and disposing of waste.

The most relevant regulations pertaining to the development are summarised below.

2.1.1 Protection of Environment Operations Act 1997

The NSW waste regulatory framework is established under the State's principal legislation, the 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 management 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.

2.1.2 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 management and recycling of packaging. It provides for the EPA to issue exemptions to the Act and it outlines offenses relating to waste.

Draft amendments to the *Protection of the Environment Operations (Waste) Regulation 2017* includes a condition that a licensed C&D waste facility must comply with the EPA's *Standards for Managing Construction Waste in NSW.* The standards give specific requirements with regard to inspection, sorting, no mixing with other waste, storage and transport.

2.1.3 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 (ESD). The WARR Act serves the following functions:

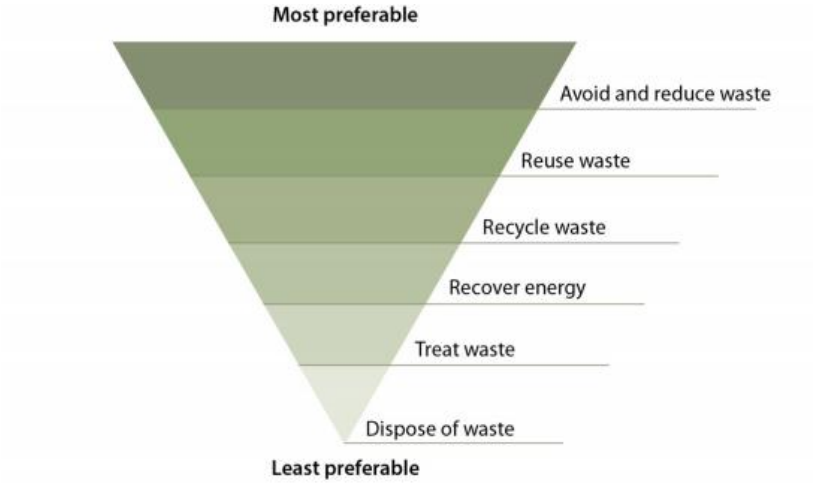
- Promotes waste avoidance and resource recovery;
- Provides for the development of the WARR Strategy;

- 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 (CDS) to promote reuse and recovery within the beverage industry.

2.1.4 NSW WARR Strategy 2014-2021

The NSW government's *Waste Avoidance Resource Recovery Strategy* (WARR Strategy) proposes priority areas and actions for the minimisation of environmental harm from waste disposal and through the conservation and efficient use of resources. It outlines a waste hierarchy that prioritises reuse and recycling over disposal, as shown in Figure 1, below.

Figure 1: NSW WARR Strategy Waste Hierarchy



The WARR Strategy sets the strategic agenda for recycling and waste avoidance in NSW, including NSW waste diversion targets (Table 1).

Table 1: NSW Waste Diversion from Landfill Targets

Waste type	2014 diversion target	2021 diversion target
Municipal Solid Waste	66%	70%
Commercial & Industrial	63%	70%
Construction & Demolition	76%	80%

The target most relevant for the C&D sector is 76% at present increasing to 80% by 2021. The proposed facility would assist NSW in meeting this target by diverting waste from landfill to resource recovery.

2.1.5 Waste Less Recycle More (WLRM) program

The Waste Less Recycle More (WLRM) program is an 8-year $802 million initiative stimulate investment in the waste sector in NSW, deliver waste and recycling services to the community and ensure a clean environment. WLRM includes grant programs for local government, business, industry and the community, delivered by the NSW EPA and the NSW Environmental Trust. The State of NSW has made progress in

diverting waste from landfill in the C&D sector, rising from a 64% diversion rate in 2002/03 to 75% in 2010/11.

The WLRM funding package has nine key focus areas:

- Local government waste and resource recovery
- Illegal dumping prevention and waste enforcement
- Household problem wastes
- Waste and recycling infrastructure
- Organics infrastructure
- Litter prevention and enforcement
- Business recycling
- Recycling innovation
- Heads of Asbestos Co-ordinating Authorities

2.1.6 EPA Strategic Plan 2017–21

On July1st 2017, the NSW EPA released its 'Strategic Plan 2017-21'. This plan aims to clarify the EPA's role and relationship with government, business and the community. The vision of the EPA is for a healthy environment, healthy community and healthy business.

The plan outlines objectives for the innovative management of waste. The NSW EPA's key success measures were set as follows:

- Illegal dumping reduced by 30% by 2020;
- Volume of littered items reduced by 40% per 1,000m^2 by 2020 – CDS implemented by 1 December 2017;
- Zero growth in per capita waste generation by 2021/22;
- Recycling rates increased to 70% for Municipal Solid Waste (MSW) and Commercial and Industrial (C&I) waste, and 80% for C&D waste by 2021/22;
- Waste diverted from landfill increased from 63% (in 2010/11) to 75% by 2021/22; and
- 90% of NSW households have access to problem waste services.

The objective most relevant to the Proposal is 80% diversion from landfill of C&D waste.

2.1.7 Australian National Waste Report (2016)

The Australian National Waste Report shows that in 2014/15 Australians produced approximately 20 megatons of C&D waste, of which approximately 12 megatons, or 61% was recycled.

The C&D waste stream in NSW accounts for approximately 6.1 megatons of waste generation, and in 2014/15 achieved a resource recovery rate of 74% nationally. Recovery rates are high for metals (88%), masonry (70%) and paper and cardboard (70%).

Opportunities exist for the improvement of the recycling performance of C&D loads, many of which are currently sent directly to landfill. The report sets an objective to increase the target of recycling of C&D waste from 75% to 80% in NSW by 2021. The Proposal would assist in achieving this goal.

2.1.8 National Waste Policy (2009)

The National Waste Policy supports a coherent, efficient and environmentally responsible approach to waste management in Australia. The policy, agreed by all Australian environment ministers in November 2009, sets Australia's waste management and resource recovery direction to 2020.

The aims of the National Waste Policy are to:

1. Avoid the generation of waste and reduce the amount of waste (including hazardous waste) for disposal;
2. Manage waste as a resource;
3. Ensure that waste treatment, disposal, recovery and re-use is undertaken in a safe, scientific and environmentally sound manner; and
4. Contribute to the reduction in greenhouse gas emissions, energy conservation and production, water efficiency and the productivity of the land.

The policy sets directions in six key areas and identifies 16 priority strategies that would benefit from a national and/or coordinated approach. These strategies provide focus to the work across individual jurisdictions, build on current directions and complement existing activity. They also provide clarity and direction for business and the community.

2.1.9 C&D minimum standards in NSW

In October 2016, the EPA released a consultation paper that proposed that new "Minimum Standards" apply to C&D waste facilities in the metropolitan levy area (MLA) of NSW.

The most significant changes for C&D waste include:

- Minimum standards at licensed C&D waste facilities to inspect, sort, recover and responsibly handle C&D waste;
- C&D waste from the metropolitan levy area to be properly processed before being landfilled;
- Recovered fines meeting specifications will be able to be used as daily cover at landfills; they will also be able to be used for land application if they meet the requirements of a resource recovery order issued by the EPA for a specific processing facility; and
- Continuous Process Recovered Fines Order 2014 and Batch Process Recovered Fines Order 2014 will no longer be in effect.

2.2 Operational Need

The operational need for the proposed activities can be summarised as follows:

- Pronto Bins has access to C&D waste which is removed from construction sites;
- The facility would provide a business-based solution to sort and store waste prior to transport to secondary processing or disposal facilities;
- Increased recycling would be achieved in accordance with the WARR strategy, the EPA Strategic Plan, the Australian National Waste Report, and the National Waste Policy;
- Increased recycling preserves Sydney's landfill void space, which will delay the need for new landfills and associated environmental impacts;
- Pronto Bins' operations would increase market availability of the primary materials for recycled and recovered concrete, soils, gyprock, cardboard, plastics etc.;
- The facility would sort and divert C&D wastes and contribute to the NSW EPA's target of 80% diversion of C&D waste by 2021/22; and

- The development would generate long term job opportunities for the local community (through the employment of 24 staff members including 3 additional staff).

3. Description of Proposal

3.1 Description

Pronto Bins has leased a portion of 115-119 Cowpasture Road, Wetherill Park, including office space and a warehouse. Proposed activities involve the sorting of materials by type for resource recovery.

It is proposed that initially the site would sort 10,000 tpa of material manually, with the assistance of a front-end loader. This recovery activity could be implemented immediately. Large recyclable materials such as concrete, bricks, metals, timbers and soils would be removed, and the materials would be sent either for further processing at a recycling facility or to a licensed landfill for disposal. Subsequently a mechanical sorting system would be installed to increase processing capacity to 20,000 tpa and improve the efficiency of resource recovery. The Proposal represents an opportunity and to improve the rate of resource recovery for the C&D materials already collected by Pronto Bins.

Existing warehouse infrastructure would be utilised for all unloading, processing and product storage requirements. No construction activities are required for the development. The installation of two demountable buildings has already been completed. The buildings are to be used as a lunchroom (4.8 x 2.4m) and an operations supervisor's office (4.8 x 3.0m). The location of the buildings is included in Appendix A, and plans for each of the buildings have been provided in Appendix C.

Operating hours for the facility would be:

Monday-Friday 6am to 6pm
Saturday 6am to 4pm
Sunday: Closed.

Further detail on the proposed C&D processing on site, including volume of waste proposed, works process, and site photographs, is presented in Section 3.3 of this EIS.

3.2 Estimated Cost

The expected cost of the Proposal, including procurement and installation of the mechanical sorting system, is $1.6 million.

3.3 Proposed Construction Activities

The demountable buildings are pre-fabricated 'portable' types structures, which are established with minimal impact. The buildings are delivered and installed on footings without the need for excavation. The buildings have been already installed, without realising the need for development consent. No further construction activities are therefore required.

3.4 Proposed Operations

The proposed facility will operate within the existing industrial shed. All operations and storage will be undertaken wholly within the building, including the unloading and loading of trucks.

The facility would receive dry, inert C&D waste. It is not intended to receive asbestos or hazardous waste.

The plant and equipment proposed to be used at the facility would comprise:

- Infeed hopper and conveyor;
- Incline conveyor;
- Vibrating screen;

- Manual Sort conveyor and platform;
- Overbelt magnet; and
- Load out conveyor.

Equipment would be sourced from RDT engineering.

The anticipated materials to be recovered include concrete, wood, metals, glass, plasterboard, masonry, soils, rubble, fibres, non-putrescible organics and plastics.

Residual materials which are unable to be recovered would be sent to a licensed landfill.

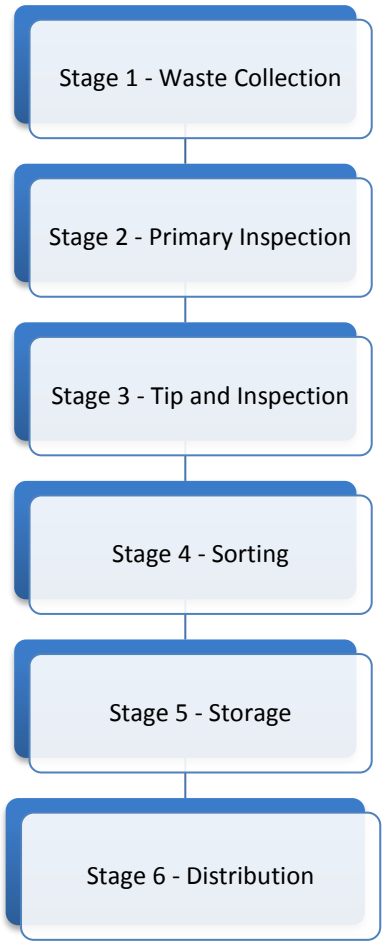
3.4.1 Waste Management Processes

The processing of C&D waste would be undertaken in six stages (Figure 2):

- Collection;
- Primary inspection (prior to unloading);
- Tip and inspection;
- Sorting;
- Storage; and
- Distribution (onsale of resources and disposal of residuals).

The stages have been developed with referral to the Draft *Standards for Managing Construction Waste in NSW,* with the aim of increasing efficiencies to reduce the potential for load contamination and increase the amount of material that can be recycled.

Figure 2: Proposed process flow for the C&D recycling operation



3.4.2 Stage 1 – Waste Collection

Pronto Bins typically collects C&D waste from new developments throughout the greater Sydney area. Clients include contractors who manage waste from building sites and individual residential building contractors.

Activities at the site would commence with trucks leaving to deliver skip bins between 6am and 7am. No deliveries of C&D waste or machinery operation would occur before 7am. Trucks would return to construction sites during the day to collect the loaded skips and transport them by road to the proposed facility at Wetherill Park. Traffic movements associated with site operations are detailed in Section 8.3. Bin sizes vary in size from 1 tonne to 10 tonne capacity, with the average load being approximately 4 tonnes. Smaller bins are skip bin types, while the larger bins are hook lift. Loads are recorded detailing drop off, pick up or changeover of bins.

3.4.3 Stage 2 – Primary Inspection

Loads would be inspected visually prior to unloading to confirm that no asbestos is contained within the waste. If no asbestos has been observed in the load, details would be recorded as required by clause 27 of the *Waste Regulation*.

If a non-conforming load is identified at this stage, the vehicle would be rejected and directed to an appropriate disposal facility. All relevant details would be recorded in the rejected loads register and maintained for use in reporting. The facility would keep a rejected loads register, with details of:

1. The date and time on which the load of waste was rejected;
2. The registration of the vehicle (including any trailer) transporting the rejected load of waste;
3. The location/address from which the rejected load of waste was received;
4. The waste type/s in the rejected load of waste; and
5. The reason the load of waste was rejected.

3.4.4 Stage 3 – Tip and Inspection

After being inspected, each truck of incoming waste would unload at the loading bay inside the shed. The waste would be tipped onto the facility floor where it would be turned and visually inspected for asbestos waste.

If asbestos waste is identified at this stage the entire load would be rejected and re-loaded into the vehicle with which it arrived. The details would be recorded in the rejected loads register (as above) and load would be re-directed to a facility that can accept asbestos contaminated materials. Vehicles would exit the building via the same entry.

Any non-conforming wastes which are not permitted at the facility would be immediately moved to a designated quarantine area. Non-conforming materials would be disposed of at a licenced facility.

All materials which may be received at the facility will proceed to be sorted and stored in accordance with Stages 4 and 5.

3.4.5 Stage 4 – Sorting

During the initial phase of operations, materials would be manually sorted with a positive sorting of bricks, concrete, metals, plasterboard, fines and paper and cardboard.

Mechanical sorting is proposed for a second phase of development. During the mechanised sorting process material will be fed onto conveyors by an excavator or loader. The purpose of the conveyors is to provide a constant, controlled flow of material to the system. The mixed inert C&D material would be sent through a two-deck vibrating screen to separate and sort small sized materials into two different grades. Concrete and masonry as well as fines would be removed at this stage. The waste stream would proceed to a manual sorting platform where workers would pick out materials according to type, such as plastics, gyprock, timber and cardboard. Ferrous materials would be removed by passing under an overbelt magnet. Sorted waste would be deposited into bunkers as they are processed. Residual materials would be deposited by an output conveyor into a stockpile. The rate of throughput, based on manufacturer specifications, is expected to be 30 tonnes per hour.

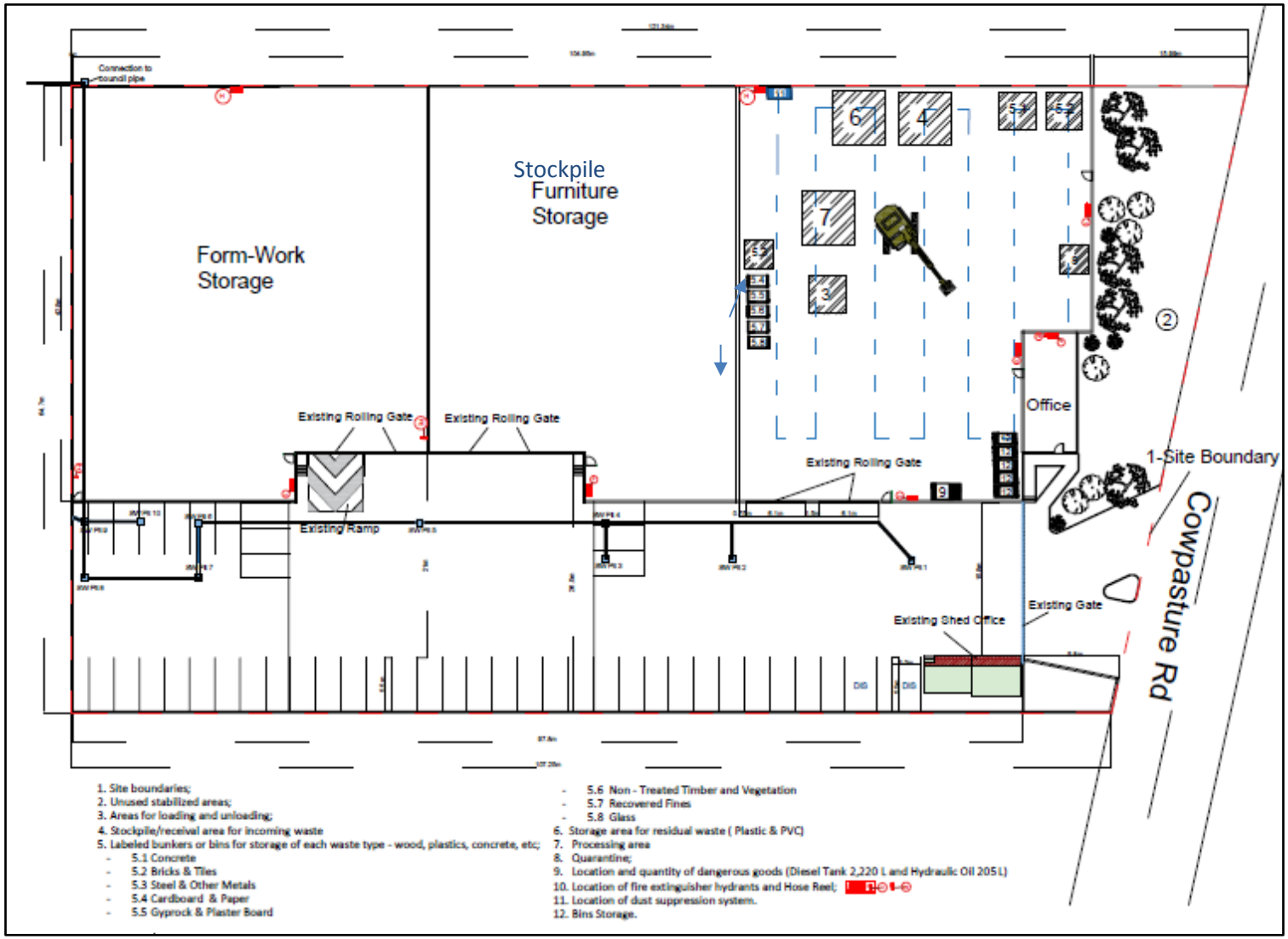
Waste that has been sorted would not be mixed with unsorted waste.

Figure 3 Shows the layout for Phase 1 of the development, using manual sorting.

Figure 4 shows the layout proposed for use on site during the second phase that includes mechanical sorting.

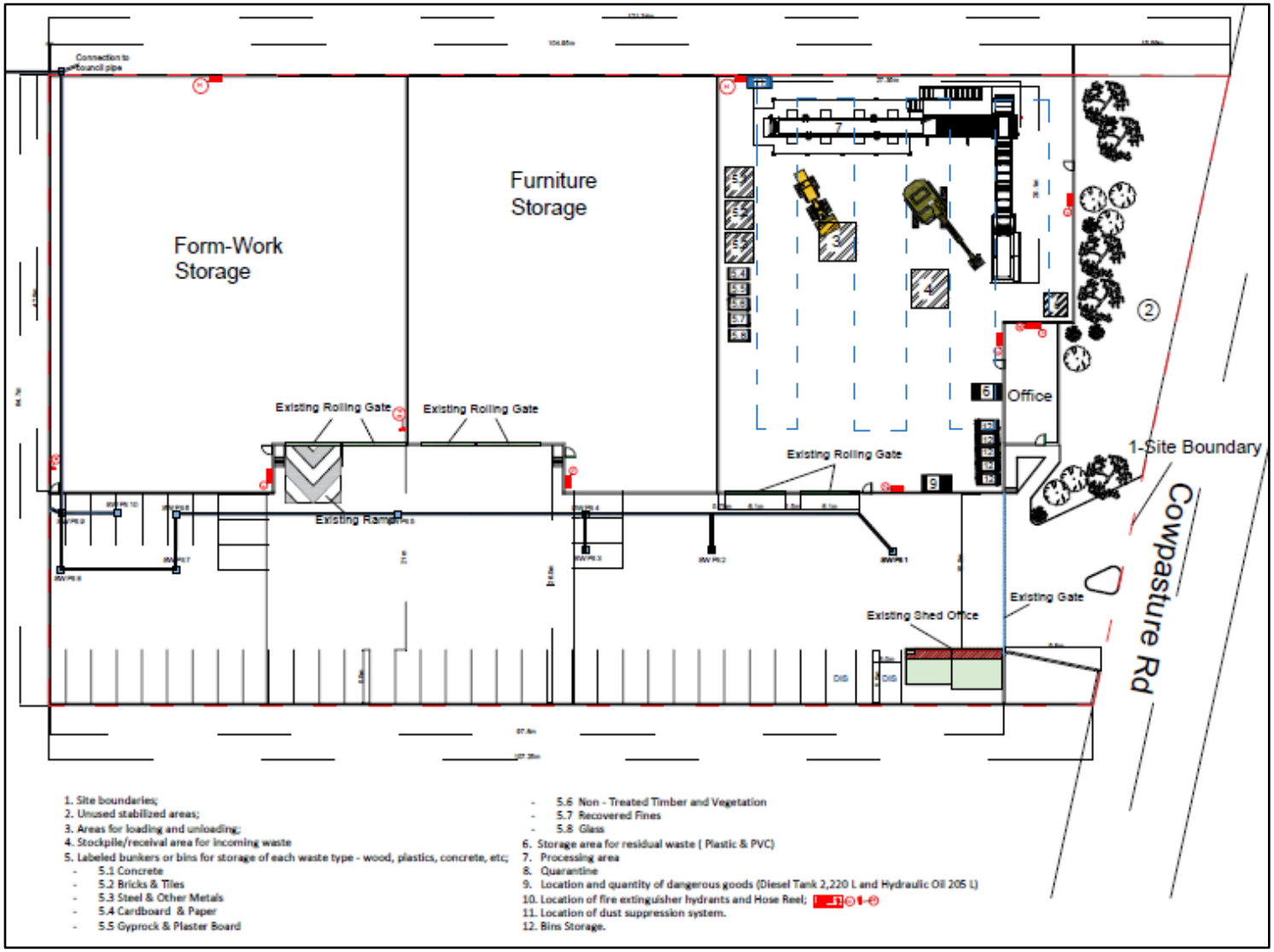
The size of the site is suitable for the proposed operations with the process accommodated as shown on the following diagrams for each method of operation.

Figure 3: Site layout, Phase 1 – Manual Sorting



Source: Pronto Bins

Figure 4: Site Layout, Phase 2 - Mechanical sorting



Source: Pronto Bins

3.4.6 Stage 5 – Storage

Materials would be classified into the following categories for storage:

- Further recovery at another waste facility;
- Further processing or mechanical sorting at the Pronto Bins facility;
- Transport to a facility that can lawfully accept the waste; or
- Disposal at a lawful waste facility.

Each individual waste type would be stored in separate storage bins or areas which are clearly labelled to indicate the type of waste to be stored.

Materials rejected at stage 2, 3 or 4 as unpermitted waste types and moved to a quarantine storage area would be transported to a waste facility that can lawfully accept that waste within one business day of receipt. As a contingency, rejected materials may be stored for up to 3 business days. A maximum of 250 tonnes of waste material would be stored onsite at any one time.

3.4.7 Stage 6 – Distribution of sorted materials

Waste types that would be transported from the facility include:

- Materials that require further processing at another facility; and
- Materials that require disposal at a lawful waste facility.

Waste would be transported in a manner that avoids the waste spilling, leaking or otherwise escaping. Materials would be covered during transportation, unless the waste consists entirely of scrap metal. Additionally, the vehicles, bins and trailers which would be used to transport the waste will be constructed and maintained so as to avoid spillage.

Any waste materials generated in the metropolitan levy area (MLA) and transported outside of NSW would require tracking using the EPA's online tracking system.

Pronto Bins is aware of several potential destinations for recovered materials, as shown in Table 2. Actual destinations and quantities will depend on market prices and location of processors.

Table 2: Processed materials destination (onsale or disposal)

Product	Possible Destinations	Potential Receivers
Bricks and roof tiles	Secondary reprocessor	Boral Recycling, ECCOR
Concrete	Secondary reprocessor	Boral Recycling, ECCOR, Fairfield Council Sustainable Resource Centre, Concrete Recyclers
Vegetation Waste	Licensed organics facility	Suez, Dial-a-Dump, ANL
Untreated timber	Licensed organics facility	Suez, Abby Pallets, ANL
Recovered fines	Licensed organics facility or application to land	Benedict Recycling, Fairfield Council Sustainable Resource Centre, ANL
Glass	Secondary reprocessor	Polytrade
Plasterboard	Secondary reprocessor	Regyp
Plastic	Secondary reprocessor or landfill	Benedict, Kurnell Landfill

Metal	Secondary reprocessor	Boral Recycling, Suez, Sell and Parker, Sims Metal, One Steel
Paper or cardboard	Secondary reprocessor	eCycleCorp, Suez, Bingo, Visy
Polystyrene	Secondary reprocessor or landfill	IS recycling
Residuals	Disposal at a licensed landfill	Local landfill

3.4.7.1 Non- recyclable waste

Non-recyclable waste that emerges from Stage 3 will be disposed of off-site. Pronto Bins would send all non-recyclable materials to a landfill which is licensed to accept it.

3.4.7.2 Recyclable materials

After being separated into different streams, the recovered materials would be transported offsite to waste processors and recyclers, where they may be reused or recycled if possible.

3.5 Record Keeping

Upon load receival, pictures would be taken of materials and recycling dockets filled out. Pronto Bins currently uses Geoop software to register jobs and detail the drop off, pick up or changeover of bins. A sequence number is used for job identification and to track the history and status of the operation.

A weighbridge is required at licenced facilities to record waste movements and to comply with the requirements of Clause 36 of the *Protection of the Environment Operations (Waste) Regulation 2014*. Under ordinary circumstances, the site can accommodate a large truck entering and leaving the site in a forward-facing direction, however, the installation of a weighbridge would severely compromise manoeuvring space.

As the site cannot accommodate a weighbridge, Pronto Bins would seek an exemption as provided for in Section 35 of the *PoEO (Waste) Regulation 2014*, from the weighbridge requirement. An alternative recording method would be employed for the operation, in accordance with the *Waste Levy Guidelines* and the conditions of the Environment Protection Licence (EPL) if they are different to the Guidelines.

Section 94 outlines the exemption conditions which apply to record keeping:

> *(1) A person who is required by an exemption granted, or an order made, under this Part to record information must comply with that requirement and must:*
>
> *a) ensure that each of the records is retained for at least 6 years after the record is made, and*
> *b) make any of the records available for inspection and copying by an authorised officer on request*.

3.5.1 Alternative Waste Measuring Methodology

This section presents some alternative methods that may be employed by Pronto Bins to measure the quantities of waste material entering and leaving the site in order to meet the legal reporting requirements in lieu of a weighbridge. Pronto Bins will reach an agreed method in consultation with the NSW EPA.

It should be noted that at least one of the applicant's employees has several years of experience as well as the skills and qualification in using alternative waste measuring methods and had previously occupied several key positions with large companies employing this method within Australia. This employee is also highly experienced in materials inventory and worksheet reconciliation for large companies with hundreds

of different products. These skills will ensure that any agreed methods to determine the quantities of waste entering and leaving the site will be accurately recorded and reported to the EPA.

3.5.1.1 On-site Systems/Methods

Operational Guidance Note 8 – Using Vehicle Weight Conversion Factors

Based on the EPA's *Waste and Environment Levy – Operational Guidance Notes* and the *NSW EPA Waste Levy Guidelines* there are other approved methods for determining the quantities of waste entering and leaving the waste facility in the absence of a weighbridge. One of these approved methods is using vehicle weight conversion factors as outlined in *Operational Guidance Note 8 – Using Vehicle Weight Conversion Factors* and *Waste Levy Guideline 4: Weight conversion factors.* Vehicle conversion factors may be used if the EPA has specifically exempted or deferred the occupier from the requirement to install a verified weighbridge or if an alternative method has not been prescribed.

Conversion factors are listed in Table 4 of the Guideline. For a skip bin containing C&D waste, the deemed tonnage of a load is:

- Mixed waste: 0.7 t/m^3
- Segregated concrete or brick: 1.2 t/m^3
- Crushed concrete & brick base material: 1.5 t/m^3
- Crushed aggregate: 1.3t/m^3
- All other waste: 1.1 t/m^3

Conversion factors that apply to trucks include the following:

- Single Steer with single rear axle: 2.72 t/m^3
- Single steer with tandem rear axle: 6.38 t/m^3
- Tandem rear axle (bogie drive) with trailer (truck and dog): 29.1 t/m^3
- Twin Steer with tandem rear axle: 7.96 t/m^3
- Waste transfer truck (Walking floor): 19.89 t/m^3
- B – Double: 39.3 t/m^3

Volumetric measuring

The management of the site could establish a protocol/method to reconcile its waste materials on a monthly basis to ensure that all materials entering and leaving the site are well balanced. Since the storage area is relatively small, materials would be processed and removed off site on a daily basis.

Almost all waste materials received on this site are transported inside skips with known volumes, and therefore it is a relatively straightforward process to determine the quantities of each waste stream by volume. For the odd occasions when waste material is received by trucks, these trucks are also small and have a known tray volume.

3.5.1.2 Off-site Systems/Methodologies

Two off-site methodologies could be used to determine the quantities of waste processed on site.

1. Waste sent to other lawfully licensed facilities where a weighbridge is in operation. The dockets obtained from these licensed facilities can provide accurate records of waste that is transported off-site.
2. Appropriately licensed and registered nearby public weighbridges could be used to record weights of incoming and outgoing loads. Based on this methodology, all loads would go through a weighbridge and obtain a legitimate docket with which the applicant will be able to accurately document the quantity of waste entering or leaving the site. A public weighbridge is located at 14 Sammut St Smithfield, approximately 6.3 km from the site. This alternative is not preferable due to additional costs and resources in accessing the weighbridge several times a day.

3.5.1.3 Combination of on- and off-site Systems/Methodologies

To increase accuracy of operations a combination of onsite and offsite could be employed.

3.6 Plant Operation and Maintenance

Pronto Bins' staff will be trained in the use of machinery and equipment and will be responsible for the operation and maintenance of all plant used at the facility.

3.7 Plant and Equipment

The unloading of skip bins from trucks would be performed using forklifts, placing loads on the floor of the shed. Thereafter excavators and loaders would be used to handle all waste, moving, sorting and loading it as required in both Phases 1 and 2.

The following equipment has been proposed by RDT engineering as suitable equipment for the operation of the Phase 2 process line of the proposed mechanical C&D sorting facility.

- 1 x Dual Deck Vibrating Screen
- 1 x Belt Magnet
- 4 x Conveyors:
    - Infeed Conveyor
    - Incline Conveyor
    - Sort Conveyor
    - Waste Conveyor
- 1 x 4 Bay Sorting Platform

The equipment would be sited within the building as shown in Figure 4.

3.8 Air

The proposed development has the potential to generate particulate emissions in the form of dust. Processing activities would take place inside the industrial shed, thereby significantly reducing the potential for dust pollution. Dust may be generated through loading and unloading of materials, transfer and sorting. Assessment of dust is based on total suspended particulates (TSP), PM_{10} and $PM_{2.5}$ emissions. PM_{10} is particulate matter 10 micrometres or less in diameter, $PM_{2.5}$ is particulate matter 2.5 micrometres or less in diameter.

Dust will be managed using a dust suppression system. Misting dust suppression pressurises water through nozzles designed to produce water droplet particles, which evaporate into the atmosphere within seconds. The mist will also encapsulate and suppress any dust particles that may be present in the atmosphere whilst falling to the ground. The use of a dust suppression system has the potential to reduce dust levels with particle sizes of 10 microns by 65.3%, and with particle sizes of 2.5 microns by 79.2%.

3.9 Noise and vibration

Noise generated during the fit-out of the process line would comprise of traffic movements, loading and unloading of plant and equipment, and the use of small scale equipment.

The fit out of the mechanical C&D waste processing equipment would occur over approximately 6 weeks.

Installation works would be within the timeframes recommended by the NSW Interim Construction Noise Guideline:

- Monday to Friday 7am to 6pm;
- Saturday 8am to 1pm; and
- No work on Sundays or public holidays.

During operation, noise would be generated from the following equipment and machinery:

- Vibrating screen;
- Trucks dumping materials;
- Excavator loading material into hopper;
- Loader moving materials into trucks;
- Trucks entering and leaving site at 10kph; and
- Trucks entering and leaving site at 10kph.

All processing activities would be housed within the existing shed, thereby reducing the potential for noise impacts.

Operating hours for the site are from 6am to 6pm Monday to Friday and 6am to 4pm on Saturdays. Prior to 7am noise impacts would be limited to trucks entering and leaving the premises. Processing would not commence until 7am.

3.10 Water

The site is previously developed with existing hardstand and stormwater infrastructure already installed. Stormwater runoff would therefore flow into existing drainage systems. A misting spray would be installed for dust suppression, however it would not consume significant quantities of water. The activity would not affect water in any local waterbody or waterway.

The loading, unloading and sorting of C&D materials has the potential to generate dust and sediment which may migrate into the local drainage channels. Discharges would be managed by filtration installed at the inlet to drainage pits. No effluent or leachate would be generated or discharged by the proposed activities.

3.11 Waste and Chemicals

3.11.1 Classification

C&D waste is dry and inert, classified as *general solid waste (non-putrescible)* according to the *EPA Waste Classification Guidelines*.

In accordance with the guideline, the substances contained in the C&D waste stream as a subsection of general solid waste (non-putrescible) includes unsegregated material (other than material containing asbestos waste or liquid waste) that results from:

- the demolition, erection, construction, refurbishment or alteration of buildings *other than:*
    - chemical works;
    - mineral processing works;
    - container reconditioning works; and
    - waste treatment facilities.
- the construction, replacement, repair or alteration of infrastructure development such as broads, tunnels, sewage, water, electricity, telecommunications and airports.

C&D waste includes materials such as:

- bricks, concrete, paper, plastics, glass and metal; and

- timber, including unsegregated timber, that may contain timber treated with chemicals such as copper chrome arsenate (CCA), high temperature creosote (HTC), pigmented emulsified creosote (PEC) and light organic solvent preservative (LOSP).

The waste collected by Pronto Bins would not contain the following:

- special waste (including asbestos and waste tyres;
- liquid waste;
- hazardous waste;
- PFAS;
- excavated soils; or
- radioactive materials.

As the incoming waste stream is pre-classified as general solid waste (non-putrescible) - building and demolition waste - in accordance with the Waste Classification Guidelines, classification by chemical assessment is not required.

3.11.1.1 Recovered fines

Soil content is limited to minor quantities of dirt / topsoil that adheres to the waste material that is loaded into the skip bins. It does not include excavated spoil or fill. This type of soil is described as recovered fines.

Pronto Bins may choose to recycle recovered fines for application to land. The "continuous process" resource recovery order and exemption would be applied to the recovery of fines from the proposed operations. "Continuous process" recovered fines are defined as: a soil or sand substitute with a typical maximum particle size of 9.5 mm that is derived from the continuous processing of mixed construction and demolition waste, including residues from the processing of skip bin waste. All the conditions of the *Continuous Process Recovered Fines Order 2014* and *the Continuous Process Recovered Fines Exemption 2014* would be met for the recovered fines to be applied to land. The resource recovery order outlines sampling requirements, chemical and other materials requirements, test methods, notification and record keeping. The "continuous process" exemption provides details of the waste, persons and premises to which the exemption applies, and the conditions of the exemption.

When applying the resource recovery order and exemption for the purpose of application to land, Pronto Bins would ensure that recovered fines comply with the conditions contained therein.

The transport of recovered fines would vary according to destination. In general, they would be applied to construction sites.

3.11.2 Mass Balance

All incoming and residual streams are C&D materials and classified as general solid waste (non-putrescible). The type of waste which is collected and sorted will vary according to the origin of loads. An expected mass balance of inputs and outputs has been provided in Table 3. The benefits of mechanical sorting are evident in improvements to the types and proportions of materials recovered.

Table 3: Mass balance for inflow and outflow of materials

Input material	Estimated tonnes per annum @10,000 tpa processing capacity	Potential for recovery 10,000 tpa	Estimated tonnes per annum @20,000 tpa processing capacity	Potential for recovery 20,000 tpa
Bricks and tiles	1,500	Recovery	3,000	Recovery
Concrete	3,295	Recovery	6,590	Recovery
Recovered fines	80	Recovery	250	Recovery
Plasterboard	275	Recovery	650	Recovery
Metal	705	Recovery	1,550	Recovery
Paper and cardboard	531	Recovery	1,062	Recovery
Plastic (recyclable)	645	Residual	1,590	Recovery
Glass	25	Residual	50	Recovery
Vegetation	162	Residual	324	Recovery
Wood – non-treated	1,040	Residual	2,080	Recovery
Treated wood and residual vegetation	80	Residual	160	Residual
Asphalt	40	Residual	80	Residual
Rubber	32	Residual	64	Residual
PVC	306	Residual	612	Residual
Plastics (residual)	598	Residual	896	Residual
Polystyrene	1	Residual	2	Residual
Insulation	5	Residual	10	Residual
Residual Metals	96	Residual	52	Residual
Building materials and fittings	432	Residual	764	Residual
Ceramics, dirt, dust rock, inert ash	152	Residual	214	Residual
TOTAL Recovery	6,386	64%	17,146	86%
TOTAL Residuals	3,614	36%	2,854	14%
TOTAL	**10,000**	**100%**	**20,000**	**100%**

3.11.3 Life-cycle strategies

One of the objectives in the establishment of the C&D processing facility is to intervene in the currently linear life-cycle of materials which now usually end up in landfill, and direct them to re-use or recycling through sorting and distribution for secondary processing. The implementation of resource recovery is a fundamental aspect of the circular economy.

3.12 Future site rehabilitation

The proposed use of the site does not inhibit future utilisation of the site for a different purpose. Rehabilitation would require the cleaning up of any stockpiled materials and residual dirt from the floor of the building and decommissioning the hazardous chemicals storage area. No contamination of the site would occur as a result of the Proposal.

3.13 Consideration of Alternatives and Justification for the Proposal

Five options were considered in developing this Proposal.

1. Do nothing;
2. Develop an alternative location;
3. Process an alternative input waste stream;
4. Use a different materials handling process; and
5. Develop 115-119 Cowpasture Rd, Wetherill Park.

Option 1 – Do Nothing

Under the non-action scenario, no steps would be taken to increase recycling rates of material collected by Pronto Bins. This is not considered to be an appropriate option as it does not address the strategic and operational needs of the development (Sections 2.1 and 2.2). It also does not achieve the environmental and economic benefits summarised in Section 10 of this EIS. The 'Do nothing' option was rejected as it would not result in fulfilling the objectives of the Proposal.

Option 2 – Develop an alternative location

Pronto Bins (in the name of GLC Civil Pty Ltd) currently holds a lease on the present site, therefore, an alternative location was disregarded due to the considerable anticipated financial, environmental and planning constraints associated with relocating.

Option 3 – Process an alternative input waste stream

Processing of alternative waste stream outside of the C&D sector was considered, including the processing of MSW and C&I waste at the proposed facility. This alternative was disregarded as the Pronto Bins core business focus is on resource recovery from the C&D sector and divergence from this core enterprise was not deemed desirable or beneficial.

Option 4 – Use a different materials handling process

The suggested mechanical materials handling process for phase 2 has been designed by RDT, a specialised company highly regarded in the waste industry, specifically to satisfy the needs of Pronto Bins at the Proposal site. Using a different, non-bespoke process has the potential to increase inefficiencies and reduce the amount of material that is diverted and recovered.

Option 5 – Develop 115-119 Cowpasture Rd, Wetherill Park

Applying for development consent to allow 20,000 tonnes per annum of inert C&D waste material to be processed through the suggested mechanical sorting line at the Wetherill Park site is the preferred option to the above alternatives.

The preferred option has the following advantages:

- The proposal site is located within a well-established industrial zone of similar and other industrial uses;
- It can better reduce the volumes and overall environmental impact of recyclable materials being sent to landfill and improve resource recovery rates for the C&D sector;
- It can lead to overall greater improvements in environmental performance as the new technology to be used in the C&D facility will increase operational efficiency and reduce energy usage across all areas of resource recovery; and
- It has the potential to further strengthen the local community through the generation of new employment opportunities.

Justification

Option 5 was chosen as the preferred option because it best satisfies the needs and objectives of the Proposal, whilst responding to site conditions and minimising the environmental effects. The Proposal responds to the need for C&D processing and diversion of waste from landfill.

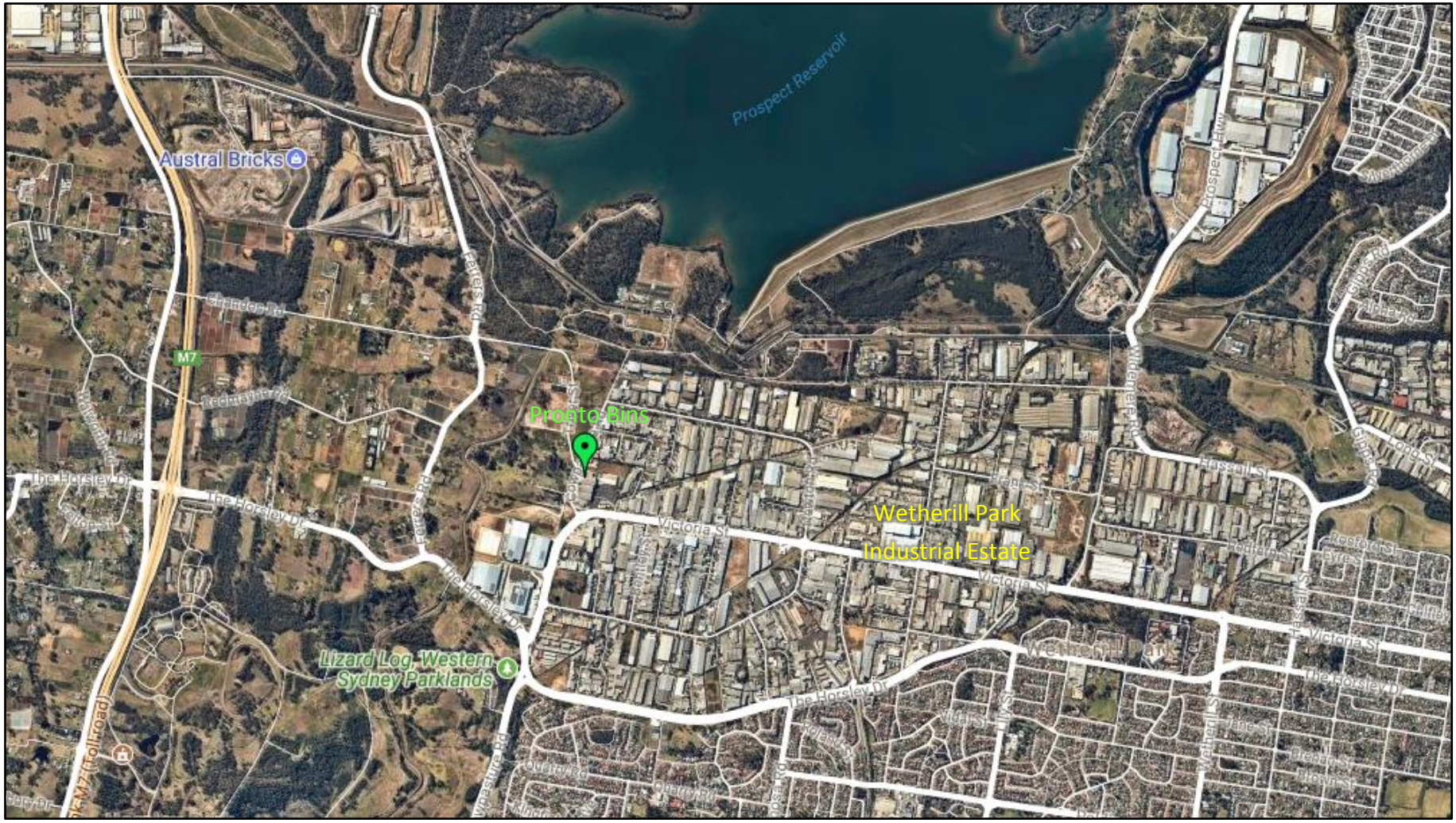
4. Location

The site analysis for the proposed facility consists of the site plan in Appendix A supported by information provided in this Section, which provides a general description of the site and its surrounds, including the site's broader context within the region.

4.1 General

The address of the site is Unit 1, 115-119 Cowpasture Road, Wetherill Park in the Fairfield City Council Local Government Area (Figure 5), approximately 30km west of Sydney. The property is identified as Lot 1 DP830767. The applicable zoning is General Industrial (IN1).

Figure 5: Site location of Pronto Bins C&D processing facility



Source: Nearmap

4.2 Site Description

The proposed development is located at the fringe of a large industrial estate, which extends over approximately 600 hectares to the north, east and south of the site. Further north lies the Prospect Reservoir, that was historically part of Sydney's water supply system but is now only used as an emergency supply of drinking water. Toward the east are small farms and undeveloped land.

The entire lot size is approximately 7,700 m^2. It is already developed, accommodating three industrial units, with Pronto Bins proposing to utilise the western unit of the site. Pronto Bins' operational area consists of driveway access, an office of approximately 80 m^2, and a large shed which is approximately 1,500 m^2 (Figure 6). The other two units are used for formwork and furniture storage.

The building is primarily constructed of concrete with steel framing. The roof is constructed of Zincalume, with translucent skylights. The office building towards the front of the site has large tinted windows with Colourbond metal trim. The property is provided with access via a driveway from Cowpasture Road, a landscaped garden, stormwater drainage, a gate, hardstand, carparking and lighting. All these facilities are shared with the occupiers of the other two industrial units.

Figure 6: Unit 1, 115-119 Cowpasture Road

Source: Nearmap

4.2.1 Site Ownership

BMA Construction Pty Ltd and Habib Family Group Pty Ltd are the owners of the development site. Consent has been granted by the landowners in a letter dated 15 December 2017 to process 20,000 tonnes of C&D waste and install two portable buildings. The letter is attached as Appendix D.

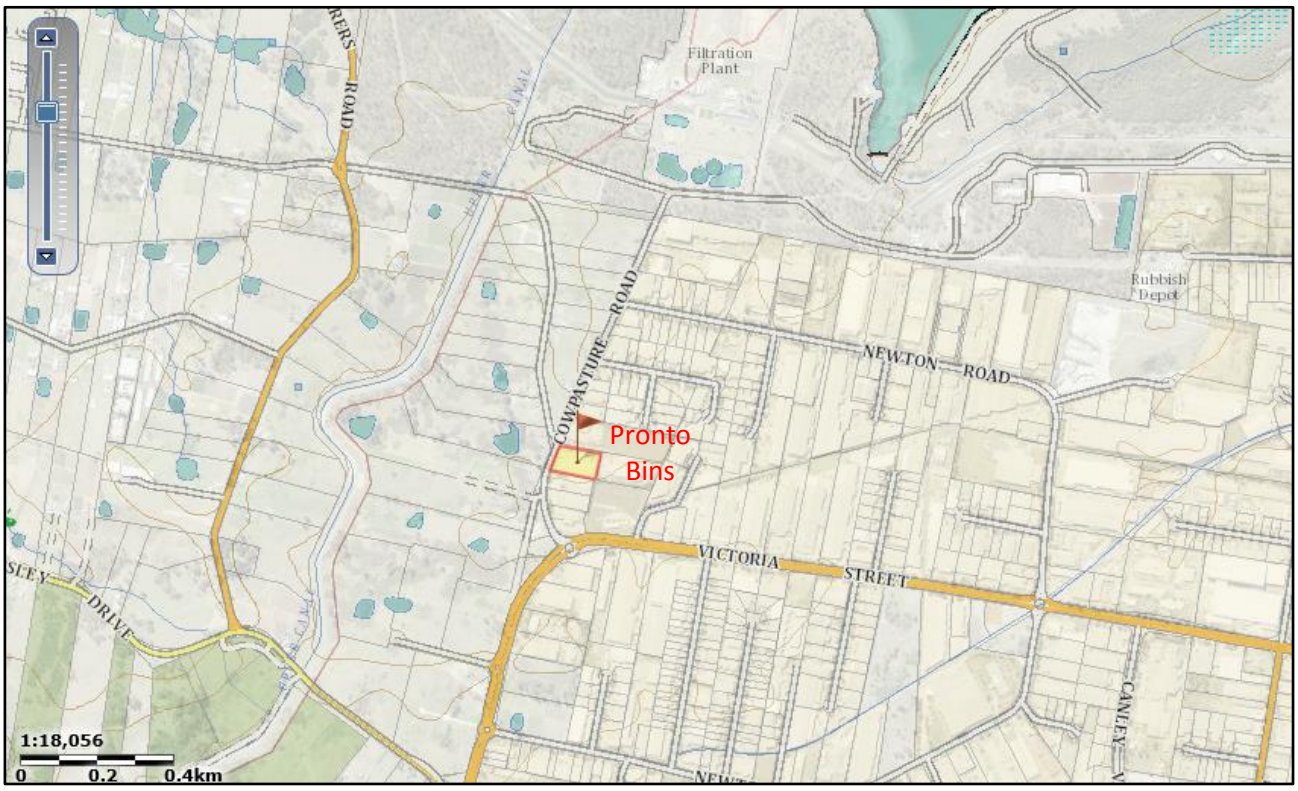
4.2.2 Site Access

The Site is located on Cowpasture Road, Wetherill Park. Access is via a 10.5-metre-wide entrance/exit gate which opens out to a 20-metre access on the Cowpasture Road frontage. Further details of site access and parking accessibility can be found in Section 8.3 of this EIS.

4.2.3 Topography of the Site

The elevation at the site is approximately 65 m above sea level. Although the site itself is relatively flat, it is close to a ridge that slopes toward the south for approximately 200 m at a gradient of approximately 5 degrees. The external section of the site is fully covered in hardstand concrete, apart from a small landscaped garden and a grassy verge. The topography of the area is shown in Figure 7.

Figure 7: Topographic map



Source: Six Maps

4.2.4 Utility and Services

Water, telecommunications and electricity are supplied to the buildings on site. The site has access to road infrastructure via Cowpasture Rd. No rail or port infrastructure exists in the immediate vicinity.

4.2.5 Ecological Information

The natural landscape has been cleared of vegetation and a small garden has been planted at the entrance to the office and in the grassy verge. The site does not provide habitat for native species and does not have the characteristics of an endangered ecological community.

4.2.6 Air

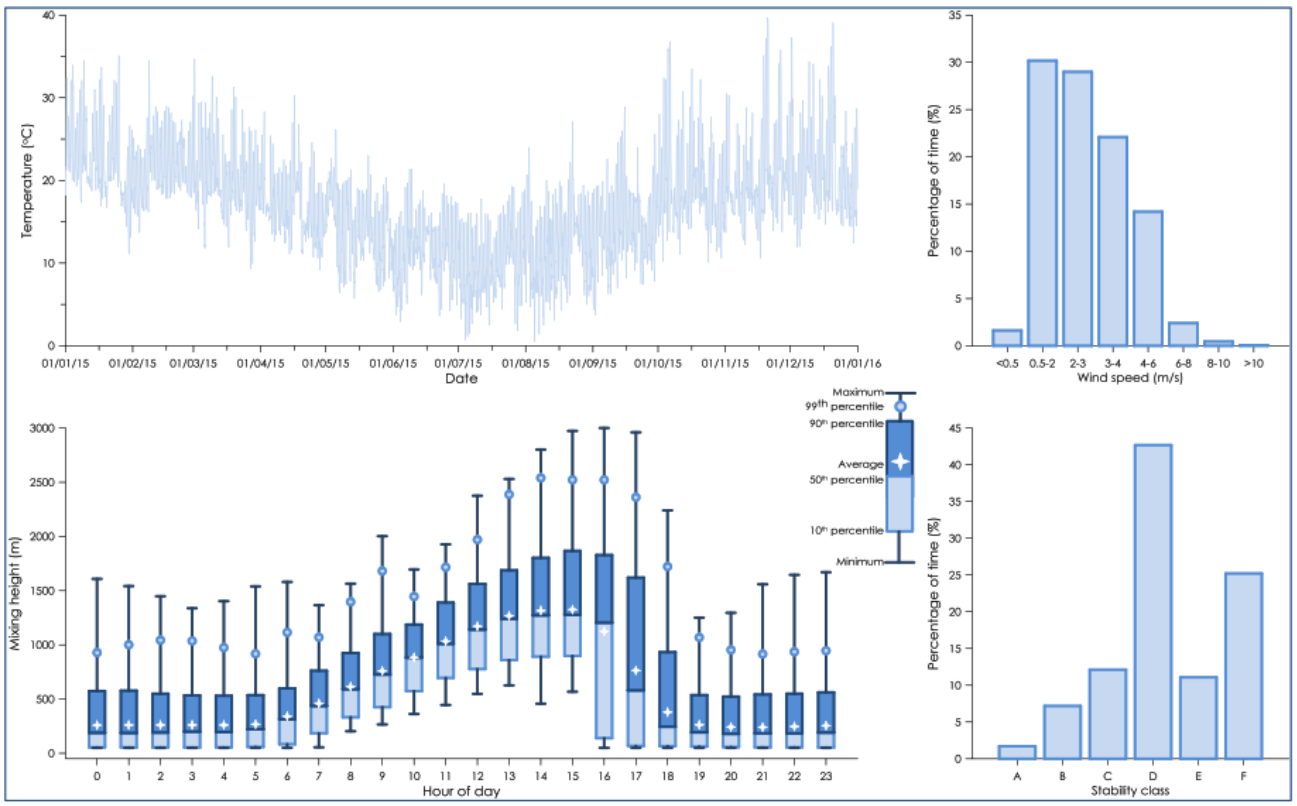
4.2.6.1 Meteorology

The local climate has been characterised in the Air Quality Assessment by Todoroski Air Sciences, using data from the Bureau of Meteorology (BoM) weather station at Horsley Park. Climate is characterised by the following details:

- January is the hottest month with a mean maximum temperature of 29.8°C and July is the coldest month with a mean minimum temperature of 5.8°C.
- Rainfall data indicates that February is the wettest month with an average of 108.7mm over 7.3 days and September is the driest month with an average rainfall of 34.1mm over 4.8 days. Summer is the wettest season.
- Humidity levels exhibit some variability and seasonal flux across the year. Mean 9am humidity levels range from 61% in October to 81% in March. Mean 3pm humidity levels range from 42% in August and September to 55% in June.
- Mean 9am wind speeds range from 8.9 kilometres per hour (km/h) in March to 12.5km/h in October. Mean 3pm wind speeds range from 12.9km/h in June to 19.9km/h in December.
- On an annual basis winds from the southwest are predominant, with other winds spread across all directions. Low winds appear to predominantly occur from the north-western quadrant and south-westerly directions.
- During summer, winds are predominantly distributed between the east-northeast to the southwest. The autumn wind distribution is similar to the annual pattern, typically dominated by winds from the southwest. In winter the distribution shows winds predominately occur from the southwest and west southwest. The spring wind distribution is similar to the annual but with reduced frequency from the southwest.

Figure 8 shows the temperature, wind speed, mixing height and stability classification, derived from air quality modelling by Todoroski Air Sciences.

Figure 8: Meteorological Analysis

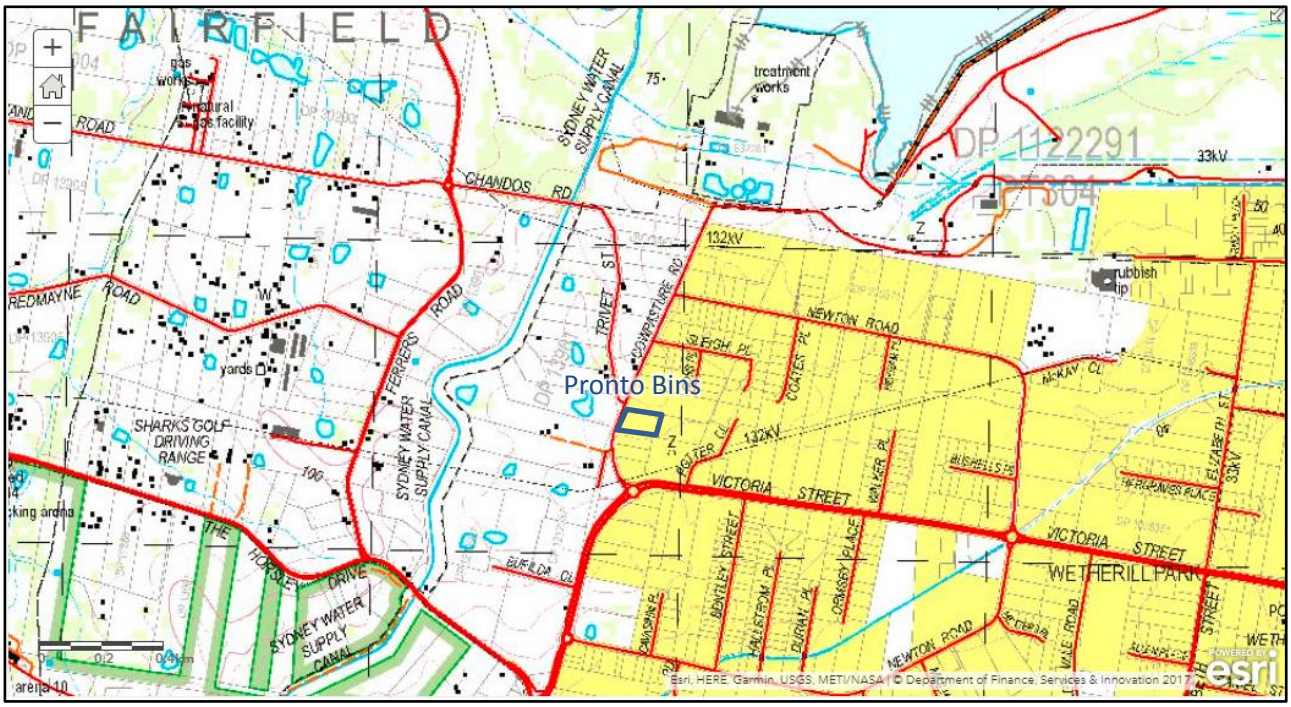


Source: Todoroski Air Sciences, 2018.

4.2.7 Waterways

The nearest natural waterway is an unnamed creek, located approximately 980m west of the site. A small man-made dam is located 180m to the west. The Upper Canal is the closest artificial waterway, a structure which transports water from upper Nepean dams to Prospect Reservoir, located 480m from the site. No natural water systems exist on site. Figure 9 shows the Proposal site and in relation to the nearest bodies of water.

Figure 9: Nearest waterways to the Proposal



Source: ArcGIS online

4.2.8 Soils

The site is located on the Luddenham soil landscape (Figure 10) which is characterised by:

- Undulating to rolling low hills on Wianamatta Group shales, often associated with Minchinbury Sandstone;
- Local relief of 50–80 m, slopes 5–20%. Narrow ridges, hillcrests and valleys; and
- Extensively cleared tall open forest (wet sclerophyll forest).

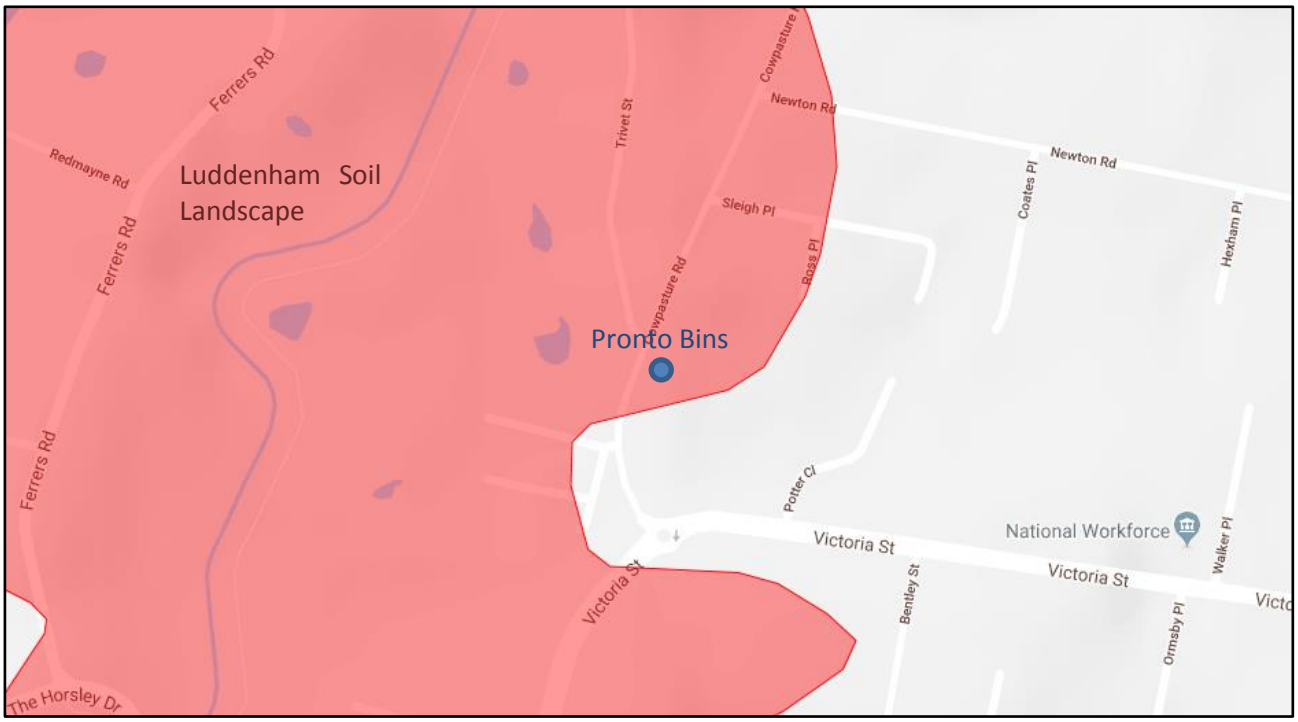
Soils— shallow (<100 cm) dark podzolic soils or massive earthy clays on crests;

moderately deep (70–150 cm) red podzolic soils on upper slopes; and

moderately deep (<150 cm) yellow podzolic soils and prairie soils on lower slopes and drainage lines.

Limitations—water erosion hazard, localised steep slopes, localised mass movement hazard, localised shallow soils, localised surface movement potential; localised impermeable highly plastic subsoil, moderately reactive.

Figure 10: Soil mapping (Luddenham Soil Profile highlighted red)



Source: Soil map index from espade.environment.nsw.gov.au. ©State of NSW and Office of Environment and Heritage

4.2.8.1 Soil Contamination

A search of the NSW Office of the Environment and Heritage eSPADE Soil and Land information mapping tool for Acid Sulphate Soils (ASS) did not indicate a potential ASS risk. The NSW EPA Contaminated Lands Register was also accessed to determine if the site has a history of contaminated land. The search did not indicate any known contamination for the site or of the immediate vicinity.

4.2.9 Zoning

The site location is zoned IN1, general industrial. To the west of the site the land is not zoned (Figure 11) as it is part of the State Environmental Planning Policy (SEPP, Western Sydney Parklands) 2009.

Figure 11: Land use zoning Fairfield LEP 2013

Source: NSW Planning Portal

4.3 Existing Surrounding Land Use

The area is characterised by industrial development of comparable scale and use to the Proposal site, generally consisting of warehouse complexes and small industrial units. The site is bounded to the north and south by industrial premises with frontages on Cowpasture Road. The industrial estate extends more than 4km to the east of the site, 1km south and 600m north. Several industries operate waste management facilities within the area, including Drima Recycling, Bincorp Equipment, Boral Recycling, Chemsal Waste Management Service, Quick Skips Australia, Getaskip, Feed Me Solutions and Wastehaul. There are also large waste and resource recovery sites belonging to Resource Co, Suez, Cleanaway and Veolia within a 5km radius.

The adjacent warehousing is occupied by Tower Group Projects Australia (formwork) and PNS furniture (furniture storage). Adjoining lots are occupied by GBJ Sabbouh Concrete Pumping to the north, Classic Frosted Glass (glass distributor) to the east and Toptyres (tyre warehousing)/Austral Wright Metals (importer and distributor of sheet and plate metals) to the south.

The land opposite the facility on the western side of Cowpasture Road is currently used for agricultural purposes, however in October 2017 it was approved for subdivision for industrial, light industrial, warehouse and office land uses. The site's visual appearance from Cowpasture Road is shown by Figure 12, below.

Figure 12: Pronto Bins' site

4.3.1 North

The adjacent to the northern site of the site is a Glass distributor – Classic Frosted Glass, with similar light industry nearby including fencing, water treatment and a lunch shop.

Figure 13: Industrial premises to the north of Pronto Bins Resource Recovery Facility showing light industry and retail

Classic Frosted Glass, adjacent driveway to north of site

Ovivo water treatment from driveway to Classic Frosted Glass

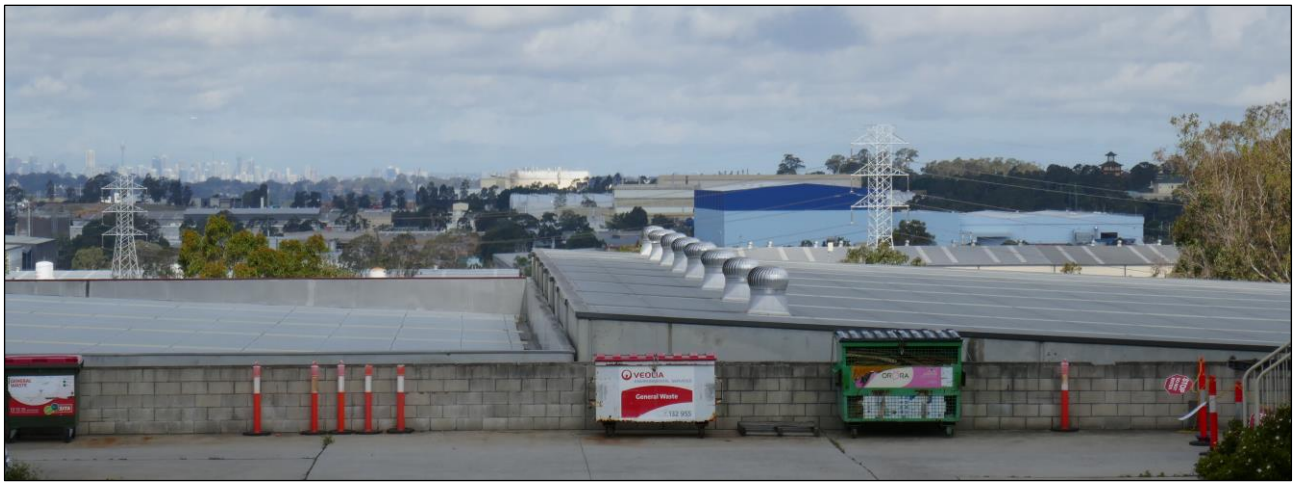
BG Fencing cnr Cowpasture Rd and Sleigh Pl

Lunch Shop, Cowpasture Rd

4.3.2 East

Industrial zoning extends approximately 4km east of the facility, as shown in Figure 14.

Figure 14: Industrial buildings toward the east



4.3.3 South

Toptyres and Austral Wright Metals are located directly to the south of the Pronto Bins facility. Further south are large-scale industrial premises.

Figure 15: Industries located south of Pronto Bins

Top tyres and Austral Wright adjacent to Pronto Bins

Industrial units south of the facility

New development large scale industrial buildings

Substation and Bridgestone Tyres

4.3.4 West

To the west of the site is vacant land which is to be developed into Horsley Drive Business Park Stage 2.

Figure 16: East of Pronto Bins

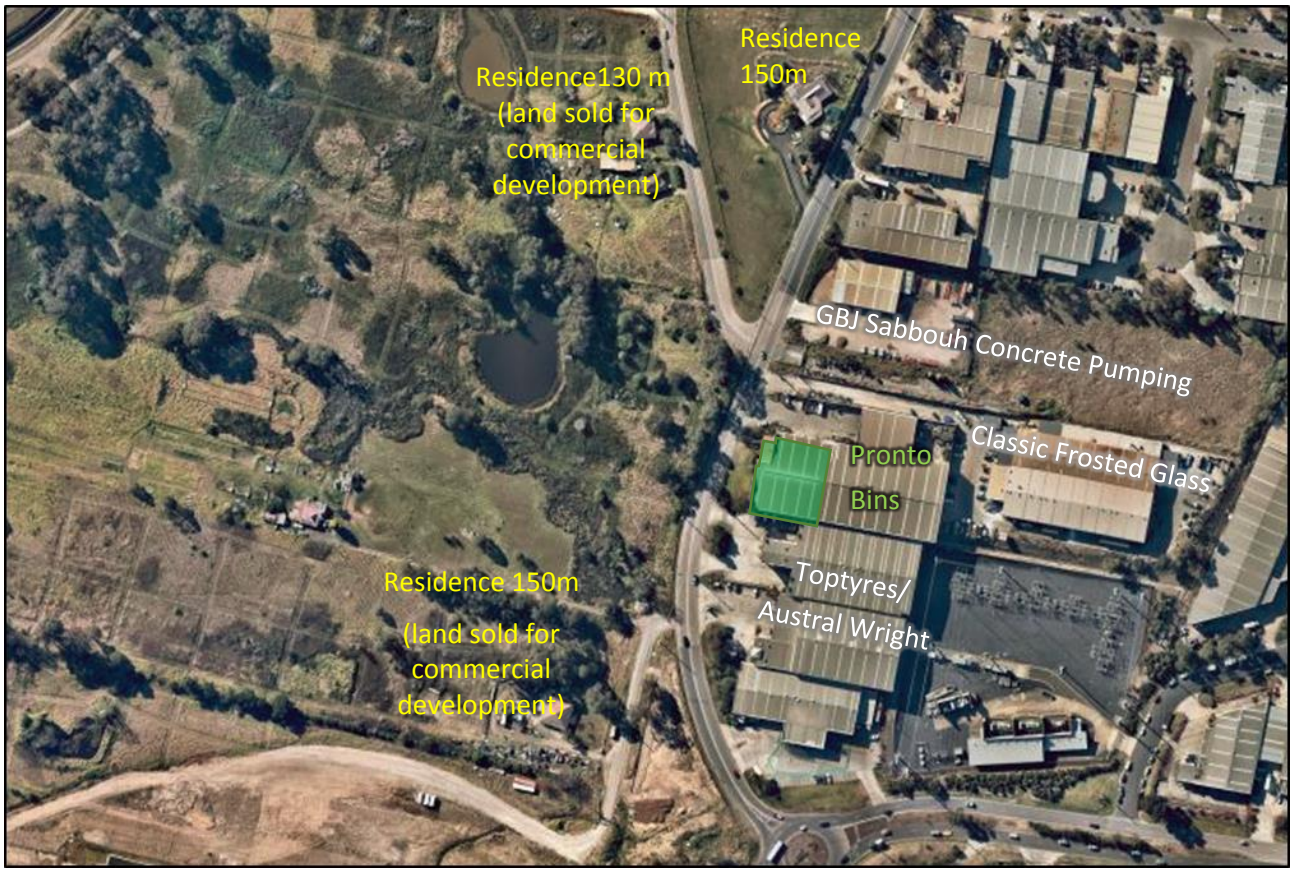
View across the road from Pronto Bins

Land west of site identified for development

4.3.5 Sensitive Receivers

The nearest residential areas are located approximately 1,200m to the south at Bossley Park. The nearest residential buildings are approximately 130m north-west of the site, 150m north of the site and 150m south-west, as shown on Figure 17. All sensitive receptors are small-scale farms. No hospitals, parks, or schools exist in the immediate vicinity. The two sensitive receivers toward the west are earmarked for redevelopment in the approved plans for the Horsley Drive Business Park Stage 2.

Figure 17: Sensitive receivers in the surrounding area



Source: Nearmap 2017

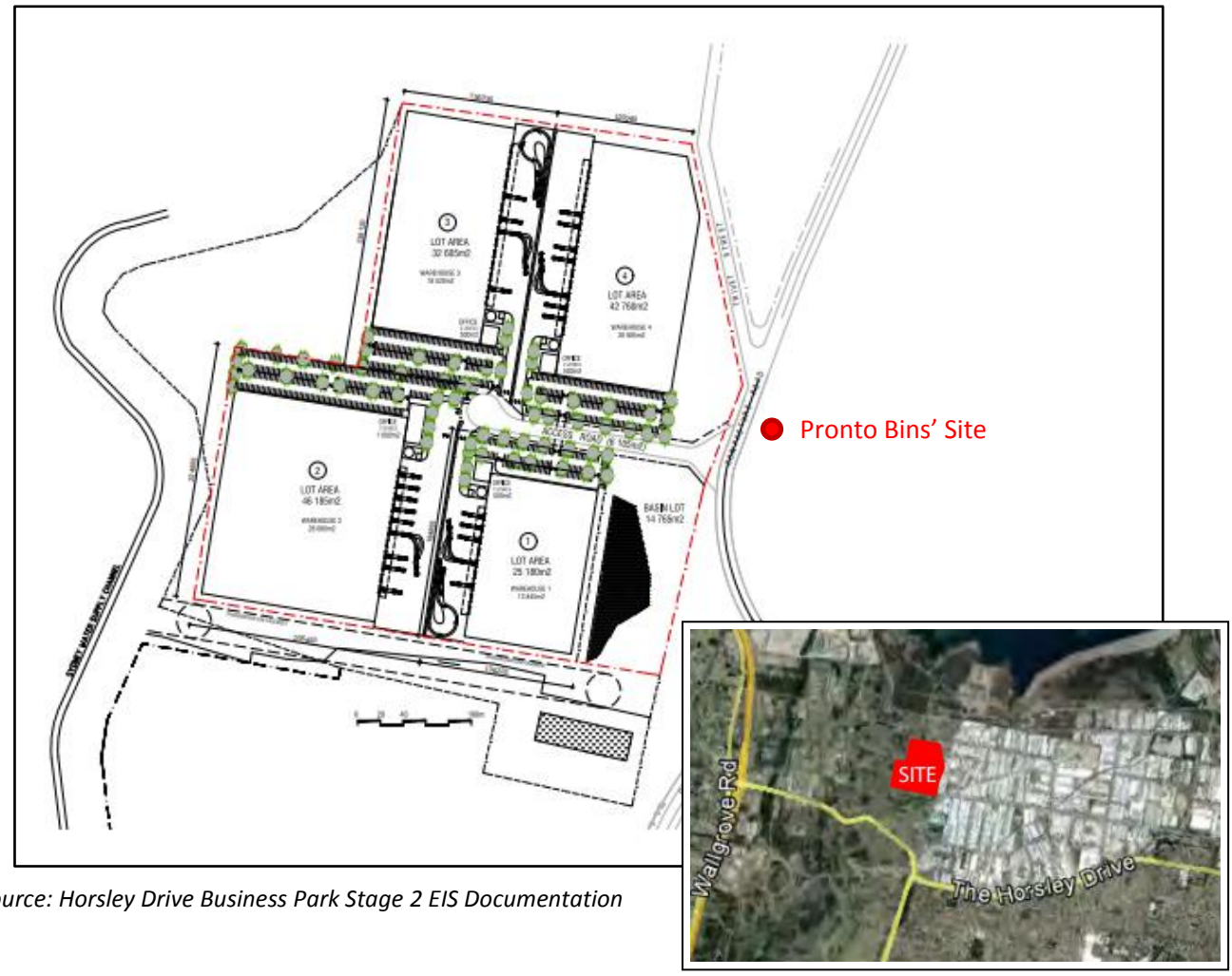
4.4 Proposed and Future Land Use

In October 2017, development consent was granted for the concept design and commencement of works for the establishment of the Horsley Drive Business Park Stage 2. The implementation of the plan will result in the development of almost 200,000m^2 of land opposite the Pronto Bins' site. The development will also eclipse two of the three sensitive receptors located 130m and 150m from Pronto Bins.

The development of the Horsley Drive Business Park Stage 2 will extend the current industrial area toward the west of Cowpasture Road. Approval is granted for conceptual development and subdivision of seven lots, four for industrial use and three for residual lots. The approval also covers works associated with construction of access, demolition, earthworks, site infrastructure and landscaping.

An indicative masterplan and site location for the Horsley Drive Business Park Stage 2 is shown in Figure 18.

Figure 18: Horsley Drive Business Park Development concept masterplan and location



Source: Horsley Drive Business Park Stage 2 EIS Documentation

5. Statutory Planning and Context

The following sections outline the planning assessment process that is applicable to the Proposal and summarise relevant environmental planning legislation that has been considered during the preparation of this EIS.

5.1 NSW legislation

5.1.1 Environmental Planning and Assessment Act 1979 & Environmental Planning and Assessment Regulation 2000

The *Environmental Planning and Assessment Act 1979* (EP&A Act) and the *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation) provide the framework for the assessment of the environmental impact of proposed development in NSW.

The objectives of the EP&A Act include:

(a) The encouragement of:

(i) The proper management, development and conservation of natural and artificial resources;

(ii) The promotion and co-ordination of the orderly and economic use and development of land;

(iii) The protection, provision and co-ordination of communication and utility services;

(iv) The provision of land for public purposes;

(v) The provision and co-ordination of community services and facilities;

(vi) The protection of the environment, including the protection and conservation of native animals and plants, including threatened species, populations and ecological communities, and their habitats;

(vii) Ecologically sustainable development; and

(viii) The provision and maintenance of affordable housing.

(b) To promote the sharing of the responsibility for environmental planning between the different levels of government in the State; and

(c) To provide increased opportunity for public involvement and participation in environmental planning and assessment.

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:

- 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; and
- Fairfield Local Environmental Plan 2013.

These EPIs are discussed in more detail in Section 5.1.2.

Pursuant to Schedule 3 of the EP&A Regulation, the Proposal is defined as *designated development* due to:

- Waste Management Facilities or Works that are located (cl.34(d)(vi)):

> *Within 500 metres of a residential zone or 250 metres of a dwelling not associated with the development and, in the opinion of the consent authority, having regard to topography and local meteorological conditions, are likely to significantly affect the amenity of the neighbourhood by reason of noise, visual impacts, air pollution (including odour, smoke, fumes or dust), vermin or traffic (cl.34(d)(vi)):*

As required by Schedule 2 of the EP&A Regulation, the development of the Wetherill Park C&D sorting facility requires an Environmental Impact Statement.

5.1.2 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 Environment Protection Authority, 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.

According to Schedule 1 of the PoEO Act, clause 3(a) of Section 34 'Resource Recovery' outlines that "each activity referred to in Column 1 of the Table to this clause is declared to be a scheduled activity if:

(a) it meets the criteria set out in Column 2 of that Table, and

(b) either:

(i) less than 50% by weight of the waste received in any year requires disposal after processing, or

(ii) an exemption granted under Part 9 of the *Protection of the Environment Operations (Waste) Regulation 2014* exempts the person carrying out the activity from the requirements of section 48 (2) as they apply to waste disposal (application to land), waste disposal (thermal treatment), waste processing (non-thermal treatment) and waste storage."

Table 4 provides an overview of the offences under the PoEO Act that are potentially relevant to the development.

Table 4: Offences under the PoEO Act

Section of PoEO Act	Offence	Section of this EIS where addressed
Section 124 – Air pollution	*Operation of plant (other than domestic plant)* The occupier of any premises who operates any plant in or on those premises in such a manner as to cause air pollution from those premises is guilty of an offence if the air pollution so caused, or any part of the air pollution so caused, is caused by the occupier's failure: (a) to maintain the plant in an efficient condition, or	Section 8.1

	(b) to operate the plant in a proper and efficient manner.	
Section 139 – Noise pollution	*Operation of plant* The occupier of any premises who operates any plant (other than control equipment) at those premises in such a manner as to cause the emission of noise from those premises is guilty of an offence if the noise so caused, or any part of it, is caused by the occupier's failure: (a) to maintain the plant in an efficient condition, or (b) to operate the plant in a proper and efficient manner.	Section 8.1

The development is a "scheduled activity" for the purposes of the PoEO Act according to clause 3(a) of Section 34 in Schedule 1, and therefore it is a requirement for the proposed activities to be included in an Environment Protection Licence for the site.

5.1.3 State Environmental Planning Policies

5.1.1.1 State Environmental Planning Policy (Infrastructure) 2007

State Environmental Planning Policy (Infrastructure) 2007 (ISEPP) assists the NSW Government, local councils and the communities they support by simplifying the approvals process for providing infrastructure in vital areas such as education, hospitals, roads, railways, emergency services, and utilities. The policy consolidates and updates 20 previous State planning instruments that included infrastructure provisions. It also includes specific planning provisions and development controls for 25 types of infrastructure works or facilities, including waste or resource management facilities.

The Infrastructure SEPP outlines the planning rules for these works and facilities, including:

- Where such development can be undertaken;
- What type of infrastructure development can be approved by a public authority under Part 5 of the EP&A Act following an environmental assessment (known as 'development without consent');
- What type of development can be approved by the relevant local council, Minister for Planning or Department of Planning under Part 4 of the EP&A Act (known as 'development with consent');
- What type of development is exempt or complying development; and
- The relationship of other statutory planning instruments to the Infrastructure SEPP.

Development for the purpose of waste or resource management facilities is permitted with consent in zones prescribed under Section 121 of the SEPP, which includes industrial land as permitted by any environmental planning instrument.

Under Clause 104 of ISEPP, traffic generating developments, including recycling facilities, must be referred to the Roads and Maritime Services (RMS). The consent authority must take into consideration any submission that the RMS provides in response to the application and the accessibility of the Site, including any potential traffic safety, road congestion or parking implications of the development.

A Traffic and Transport Impact Assessment has been prepared to identify and address the potential traffic implications of the Proposal. Traffic and transport is summarised in Section 8.3 and is presented in full as Appendix I.

Division 23, clause 121 permits development of a waste or resource management facility with consent in the zone ***IN1 General Industrial***. As such, the Proposal is permitted with consent within the provisions of ISEPP.

5.1.1.2 State Environmental Planning Policy 33 - Hazardous and Offensive Development

SEPP 33 – Hazardous and Offensive Development links the permissibility of an industrial development proposal to its safety and environmental performance. Certain activities may involve handling, storing or processing a range of materials, which, in the absence of controls, may create risk outside of operational borders to people, property or the environment. Such activities would be defined by SEPP 33 as a 'potentially hazardous industry' or 'potentially offensive industry'. SEPP 33 applies to any industrial development proposals which fall within these definitions. Under Clause 3, a development is deemed part of a potentially hazardous industry if it satisfies the definition:

> *"a development for the purposes of any 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 pose a significant risk in relation to the locality:*
>
> *a) to human health, life or property, or*
>
> *b) to the biophysical environment,*
>
> *and includes a hazardous industry and a hazardous storage establishment."*

The Department of Planning (DoP, 2011) guideline "Applying SEPP 33" provides a risk screening procedure to facilitate determination of whether a proposed development is applicable under the SEPP. If, under this screening test SEPP 33 is triggered, Clause 12 of SEPP 33 requires that any proposal to carry out a potentially hazardous development must be supported by a Preliminary Hazard Analysis (PHA).

As the Proposal falls within the definition of a "potentially hazardous industry", a screening assessment was undertaken, which is outlined in Section 7.3. The assessment found the Proposal would not trigger the need for a PHA as it would operate below the screening levels set out in the guidelines.

5.1.4 National Parks and Wildlife Act 1974

The National Parks and Wildlife Act 1974 (NPW Act) provides the basis for the legal protection and management of Aboriginal sites and relics within NSW (Sections 87 and 90). The Act requires:

- Consultation with OEH prior to development to determine the existence of items of Aboriginal heritage;
- Consultation with local Aboriginal groups; and
- Consent to disturb or destroy Aboriginal heritage sites/items.

Due to the absence of ground surface disturbance by the development proposal, no impact on Aboriginal Heritage sites or values is anticipated. See Section 8.11 for further details.

5.1.5 Heritage Act 1977

The Heritage Act 1977 includes a range of provisions for identifying and protecting items of environmental heritage. The Act controls development of, or in the vicinity of, a State heritage item. The State Heritage Register established under Section 22 of the Act, lists items that have been assessed as being of State significance.

There are no items of heritage significance near the site.

5.2 Local Planning Instruments

5.2.1 Fairfield Local Environmental Plan 2013

The Fairfield LEP 2013 came into force on 17 May 2013. The LEP is Council's principal planning instrument for the Fairfield Local Government Area. The Wetherill Park C&D sorting facility is located within an area of the Fairfield LGA.

The aims of the Fairfield LEP are outlined as follows:

(1) This Plan aims to make local environmental planning provisions for land in Fairfield in accordance with the relevant standard environmental planning instrument under section 33A of the Act.
(2) The particular aims of this Plan are as follows:
    (a) to ensure that appropriate housing opportunities are provided for all existing and future residents and that those housing opportunities accommodate different lifestyles, incomes and cultures,
    (b) to ensure that the economic, employment and educational needs of the existing and future community are appropriately planned for,
    (c) to ensure that the recreational and social needs of the existing and future community are appropriately planned for,
    (d) to ensure that development is properly integrated with, or assists in improving, Fairfield's public services, infrastructure and amenities,
    (e) to ensure the proper management of productive agricultural land and prevent the fragmentation of agricultural holdings,
    (f) to conserve the environmental heritage of Fairfield,
    (g) to protect and manage areas of remnant bushland, natural watercourses and threatened species.

Under the Fairfield LEP 2013, the Proposal site is located in the land use zone ***IN1 General Industrial*.**

Relevant details from the Land Use Table in the Fairfield LEP regarding zone *IN1 General Industrial* are contained in Table 5 below.

Table 5: Land Use Zone *IN1 General Industrial*

Land Use Zone – Zone IN1 General Industrial
1. Objectives of zone • 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 use; • To support and protect industrial land for industrial uses; and • To ensure development is not likely to detrimentally affect the viability of any nearby business centre. **2. Permitted without consent** Environmental protection works. **3. Permitted with consent** Depots; Freight transport facilities; Funeral homes; Garden centres; General industries; Hardware and building supplies; Industrial training facilities; Kiosks; Landscaping material supplies; Light industries; Neighbourhood shops; Plant nurseries; Roads; Rural supplies; Take away food and drink premises; Timber yards; Vehicle sales or hire premises; Warehouse or distribution centres; Any other development not

Land Use Zone – Zone IN1 General Industrial
specified in item 2 or 4. **4. Prohibited** Air transport facilities; Airstrips; Amusement centres; Boat launching ramps; Boat sheds; Camping grounds; Caravan parks; Cemeteries; Charter and tourism boating facilities; Commercial premises; Correctional centres; Eco-tourist facilities; Entertainment facilities; Environmental facilities; Exhibition homes; Exhibition villages; Extensive agriculture; Farm buildings; Forestry; Function centres; Health consulting rooms; Heavy industrial storage establishments; Heavy industries; Home-based child care; Home businesses; Home occupations; Home occupations (sex services); Information and education facilities; Intensive livestock agriculture; Jetties; Marinas; Medical centres; Mooring pens; Moorings; Research stations; Residential accommodation; Restricted premises; Rural industries; Sex services premises; Tourist and visitor accommodation; Water recreation structures; Water reticulation systems; Water treatment facilities; Wharf or boating facilities.

As indicated in Table 5, waste recycling facilities are permitted with consent in Zone IN1 General Industrial, as they are not prohibited in items 2 or 4. In addition, the proposed development meets the zone objectives from the Fairfield LEP as described below:

1. *To provide a wide range of industrial and warehouse land uses* – As a resource recovery facility, the proposed development adds to the diversity of land uses in the area;
2. *To encourage employment opportunities* – The proposed development would add 3 full-time employment positions to the local area;
3. *To minimise any adverse effect of industry on other land uses* – As discussed in Section 10 the proposed development will have no adverse effects on the environment or on industry in the surrounding area;
4. *To support and protect industrial land for industrial uses* – The proposal development will ensure continuity of the use of land for industrial purposes; and
5. *To ensure development is not likely to detrimentally affect the viability of any nearby business centre* – The proposed development will in no way affect the viability of any nearby businesses.

5.2.2 Fairfield Council Area Mapping

The site is not impacted by the mapping of any of the following:

- RFS Bush Fire Prone Land Map;
- Wetherill Park Flood Risk Precinct Map;
- Fairfield Local Environmental Plan 2013 Maps:
    - Heritage;
    - Terrestrial Biodiversity;
    - Riparian Lands and Watercourses
    - Acid Sulphate Soils Landslide Risk; and
    - Key Sites.

5.2.3 Fairfield City Wide Development Control Plan 2013

The Fairfield City Wide Development Control Plan 2013 (Fairfield DCP) has been prepared to provide objectives, controls and guidance to applicants proposing to undertake development in the Fairfield LGA and for Council to use as reference in the assessment of development applications.

The Fairfield DCP applies to all land within the Fairfield LGA and must be read in conjunction with any Environmental Planning Instrument (EPI) that applies to the land. If there is any inconsistency between the DCP and the LEP, the LEP will prevail.

Through the DCP, Council wishes to encourage business investment and promote local employment opportunities. Thereby it focuses on:

- The compatibility of the development for the site;
- Supporting quality design with workforce amenity a priority;
- Environmental sustainability with minimum impact on air and water quality; and
- Reinforcing recycling principles.

Section 5.2.3.1 includes a compliance summary with the relevant sections of the DCP.

The controls implemented to address each of the relevant sections of the DCP are sufficient to ensure that the proposed development complies fully with Fairfield DCP requirements.

5.2.3.1 Compliance with Fairfield Citywide Development Control Plan 2013

Details of compliance with the Fairfield DCP are outlines in Table 6.

Table 6: Compliance summary of the proposed development in relation to the Fairfield DCP (Chapter 9: Industrial Development)

Relevant Objectives/Controls	Comment
INDUSTRIAL DEVELOPMENT	
9.0 Consultation Requirements with Electricity Supply Authorities – Wetherill Park	
9.04 Electricity Supply	The development is not within 30m of the TransGrid asset and therefore this condition does not apply.
9.1 Site and Built Form	
9.1.2 Building Setback 10 m	The setback of the proposed demountable buildings would be approximately 20m which is greater than the minimum requirement of 10m.
9.2 Car Parking, Vehicle and Access Management	
9.2.1 Traffic Generating Development	Recycling facilities of any size or capacity are listed on Schedule 3 of the *State Environmental Planning Policy (Infrastructure) 2007.* A detailed traffic assessment has been supplied in Section 8.7 and the accompanying Traffic Impact Assessment Report by EB Consulting.
9.2.2 Car parks	The need exists for approximately 26 car parking spaces, including one accessible space to serve Pronto Bins and the adjacent facilities. The site is able to accommodate 44 car parking spaces, which exceeds the required need. More details are included in Section 8.7.
9.2.3 Loading Facilities	Availability of loading facilities per m^2 would not be altered by the current DA.
9.2.4 On-site manoeuvring	On-site manoeuvring allows for a rigid truck to enter and leave the facility in a forward-facing direction as demonstrated in Section 8.3 of this report and the attached Traffic Impact Assessment (Appendix I).
9.2.5 Vehicular Access	No alterations to vehicular access are required for the proposed development.
9.2.6 Pedestrian Movement	There would be no changes to pedestrian access as a result of the development.
9.2.7 Splay Corners	The site does not involve development near an intersection.
9.3 Advertising Signage	
9.3.1 Assessment criteria	The development would comply with the following provisions of the

Relevant Objectives/Controls	Comment
	DCP: • Total sign area would be less than 0.5m^2 of every metre of linear frontage. • No sign would exceed 30m^2. • No more than one free standing commercial sign would be erected and would comply with setback and design requirements. Proposed advertising signage would be approximately 1.5m x 3m, which equates to 4.5m^2. The maximum signage area for frontage of 68m is 30 m^2. The sign would not be freestanding.
9.4 Streetscape and Amenity	
9.4.1 Landscaping	No change to existing development.
9.4.2 Fencing	No change to existing development.
9.4.3 Building materials	External cladding of new buildings would be cream colorbond material with a dark green trim.
9.4.4 Hours of operation	Operating hours would be: Monday-Friday 6am to 6pm Saturday 6am -4pm Sunday: Closed. Although the site is within 500m of residential properties and the facility is open from 6am, noisy activities would be restricted to within the requirements of the DCP, being: Monday-Friday 7am to 9pm Saturday 8am -6pm Sunday 9am to 5pm. The only activities prior to these hours would be vehicle movements. See Section 8.2, Noise, for further information.
9.4.5 Residue land	Not applicable as the land has been previously developed.
9.5 Development Guidelines for Specific Activities and Uses	
9.5.1 Storage Premises	The site is not defined as storage premises.
9.10 Site Servicing	
Site Servicing	Site is serviced adequately, in accordance with previous development approval.
11 Flood Risk Management	
The proposed development is not within a low, medium or high-risk precinct according to the Wetherill Park Flood Risk Precinct Map.	
12.1 Car Parking	
Car parking	There are no new development requirements with regard to car parking.
12.3 Special Requirements	
12.3.1 Drivers with a disability	Minimum spaces for drivers with a disability have been provided in accordance with AS1428, as demonstrated in Section 8.3.
12.3.2 Stack Parking	Stack parking would not be constructed onsite.
12.3.2 Bicycles	No new development requirements.
12.3.3 Mechanical Parking	No mechanical parking would be constructed onsite.
12.3.4 Multi-Storey Car Parks	No multi-storey parking would be constructed onsite.
12.3.5 Car Theft	Entry and exit points are visible from the office building. Onsite lighting

Relevant Objectives/Controls	Comment
	provides illumination for car parking areas at night-time and reduces risk of theft.
12.3.8 Trucks and Vans – Loading Information for Commercial and Industrial Developments	Loading would be carried out onsite with deliveries and unloading occurring approximately 16 times per day. Short delays are anticipated during the manoeuvring of trucks within the driveway, however, this would not affect the efficient operation of the Pronto Bins site nor the adjacent facilities.

5.3 Other Legislation and Guidelines

5.3.1 Commonwealth Environment Protection and Biodiversity Conservation Act 1999

Under the *Environment Protection and Biodiversity Conservation Act* (EPBC Act) a person must not, without an approval under the Act, take an action that has or will have, or is likely to have, a significant impact on a matter of National Environmental Significance (NES), on the environment or on Commonwealth land. An action includes a project, development, undertaking or an activity or series of activities.

An action does not require approval if it is a lawful continuation of a use of land that was occurring before the commencement of the Act. An enlargement, expansion or intensification of a use is not a continuation of a use. The development's potential to result in a significant impact on each matter of NES listed under the EPBC Act, is discussed in Table 7.

Table 7: Commonwealth EPBC Act considerations

Objective	Matters for consideration	Comment
Regulates actions that may have a significant impact on matters of NES, which include: 1. National Heritage; 2. Australia's World Heritage properties; 3. Ramsar wetlands of international importance; 4. Nationally threatened species and ecological communities; 5. Migratory species listed under the EPBC Act; 6. Commonwealth marine areas; 7. Great Barrier Reef Marine Park; and 8. Nuclear actions, including uranium	Actions likely to impact on matters of NES require approval from the Commonwealth Minister for the Environment, Heritage and the Arts under Part 6 of the EPBC Act.	The Proposal would not impact on matters of NES as: 1. There would be no impact on any property currently on the Department of Sustainability, Environment, Water, Population and Communities (DSEWPC) Heritage Lists; 2. There would be no impact on World Heritage Properties as a result of the Proposal; 3. There would be no impact to any wetlands of international importance; 4. There would be no impact on Commonwealth-listed threatened species or ecological communities; 5. There would not be any impact on Commonwealth listed migratory species or migratory species protected under international agreements; 6. The Proposal is not located within or adjacent to a Commonwealth marine area. There would be no direct or indirect impact upon a Commonwealth marine area arising as a result of the Proposal; 7. The Proposal is not located within or adjacent to the Great Barrier Reef Marine Park. There would be no direct or indirect impact upon the Great Barrier Reef Marine Park arising as a result of the Proposal; and 8. The Proposal would not involve a nuclear action.

Objective	Matters for consideration	Comment
mining.		

Accordingly, a referral to the Department of Sustainability, Environment Water Populations and Communities (DSEWPAC) is not necessary for the Proposal.

5.4 Compliance with Planning Controls

The development meets the requirements of the relevant planning instruments and legislation addressed in Section 5. In particular:

- The development site is designated as Zone IN1 – General Industrial under the Fairfield LEP, where resource recovery facilities are permitted with development consent;
- The development:
    - Is consistent with the requirements of the PoEO Act;
    - Complies with the relevant requirements of the Fairfield LEP and the Fairfield DC; and
- The development does not impact any matters of NES under the EPBC Act.

6. Consultation

Pronto Bins has consulted with the relevant local and State Government authorities, and surrounding landowners and occupiers, as was recommended in the SEARs. The following sections detail the outcomes of relevant consultation.

6.1 Government Agency Consultation

Government agencies' requirements were sought through the request for SEARs. Requirements were received from the NSW EPA and NSW RMS, as outlined in Section 1.4. These requirements have been addressed as part of this EIS and, where required, further addressed by specialist consultants in separate specialist reports.

The SEARs advised that WaterNSW and The Rural Fire Service (RFS) were unable to provide a response in time. Consultation was undertaken by MRA Consulting Group (MRA) on behalf of Pronto Bins with these agencies and Fairfield City Council via email correspondence.

6.1.1 WaterNSW

MRA emailed WaterNSW for feedback regarding the Proposal on 7 June 2018. A response was received on 14 June indicating that there were

> *"no specific comments or requirements for the EIS as the site is located downslope and over 400m from WaterNSW's Upper Canal."*

It is also noted that the correspondence was passed on to the WaterNSW waste regulation team.

No further feedback has since been received, and therefore it is assumed that WaterNSW has no issue with the proposed development.

6.1.2 The Rural Fire Service

MRA contacted the RFS on 7 June 2018 via email regarding SEARs feedback for the Proposal. The response on 28/06/2018 is outlined below:

> *Just to advice you about the process, the NSW Rural Fire Service can provide development related advice to either Local Councils or Department of Planning & Environment. Can you please provide me the details of the officer at the DPE who is handling your application, along with an application reference number (if possible), so that we can address our response accordingly.*
>
> *Regarding the proposal, the changes proposed to the existing warehouse are all internal and as such, we do not have any concerns to the development. Any future proposal involving external changes (additions/alterations including doors or windows) shall be accompanied by a bushfire consultant's report.*

MRA responded on the same day, giving the details of the officer at DPE, however no further comment has been received.

6.1.3 Fairfield City Council

Fairfield City Council was contacted by phone and email on 19 June 2018. The email correspondence included the *Request for SEARs* application, outlining the proposed development, and requested comment. No response has been received.

Consultation with Fairfield City Council is expected to continue throughout the development application process.

6.2 Community Consultation

6.2.1 Consultation Methodology

The Proposal is located in an industrial area on Cowpasture Road and is zoned IN1 General Industrial. The neighbouring businesses include formwork, furniture storage, a concrete pumping company, glass manufacturing and a metals distributor.

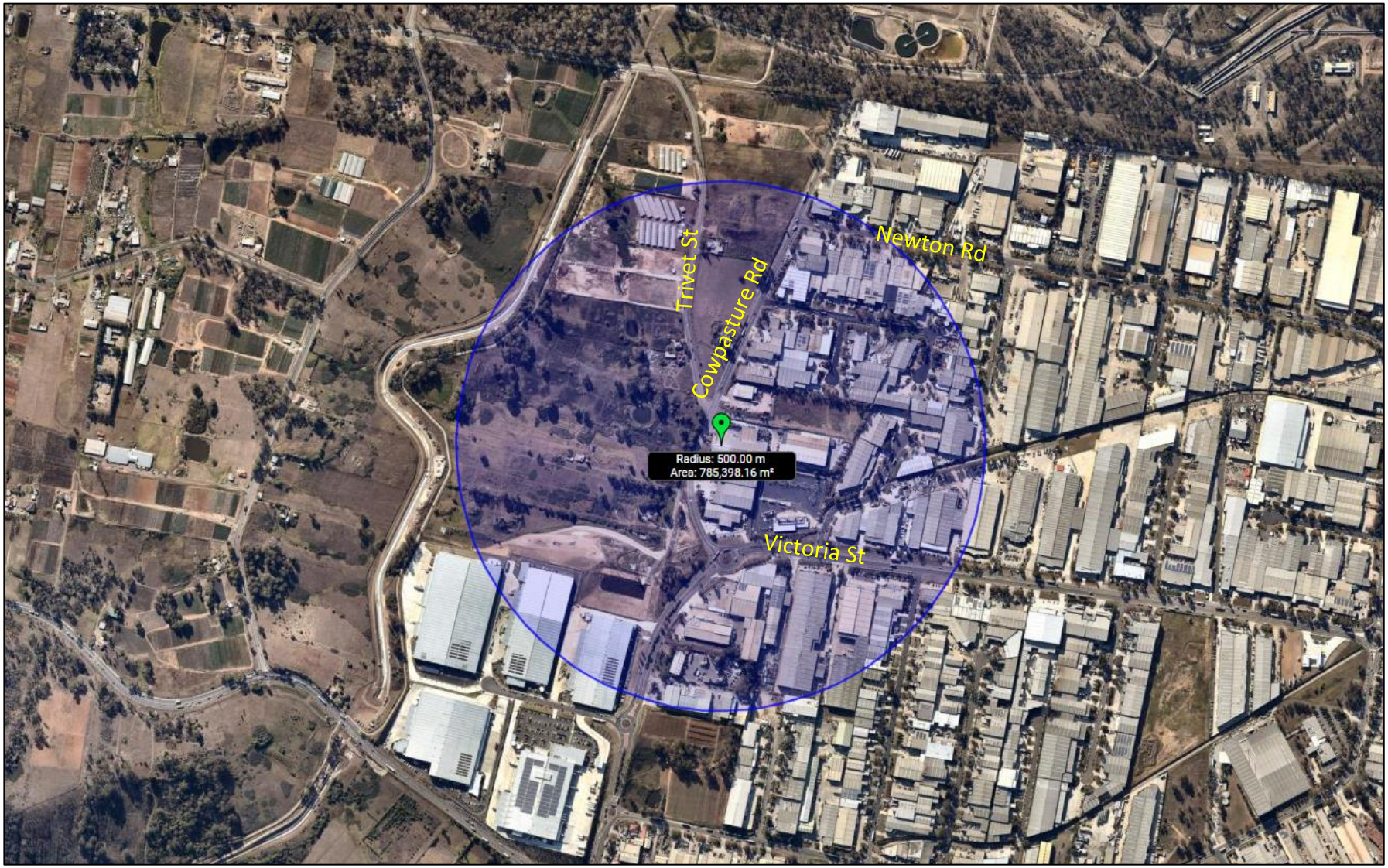
MRA developed an information sheet (Appendix E) and identified a suitable consultation area on behalf of Pronto Bins. The consultation area extended to a 500m radius around the site. A letterbox drop was arranged and several businesses and residences from the surrounding area were visited on 28 May 2018 to distribute information regarding the Proposal and discuss any issues of potential concern. The information sheet included details of a contact to discuss the development and lodge any complaints. Figure 19 displays the area of consultation. The extent of the consultation area covered the total area that could potentially be impacted by the Proposal through traffic, noise and air and was determined based on the draft traffic, noise and air quality assessments to ensure that any members of the community that could be affected by the Proposal were consulted.

6.2.2 Consultation Responses

A single response was received during the consultation period from Top Tyres, a neighbouring business to the south of the proposed development. The enquiry was made by phone call on 1 June 2018 to the office of MRA. MRA's senior planner responded by phone on 16 July 2018. The matter was referred to Pronto Bins by email on 16 June 2018 for further action.

Top Tyres stated that the exterior wall of the Pronto Bins warehouse looks damaged and potentially presents a hazard to the Top Tyres parking area. There were no objections to the establishment of a C&D processing facility. Pronto Bins has contacted the business owner and visited the site to resolve the matter. No responses were received in relation to the proposed development.

Figure 19: Community consultation area (500m radius) around the site



7. Identification and Prioritisation of Issues/Scoping of Impact Assessment

7.1 Preliminary Environmental Risk Assessment

A preliminary environmental risk assessment has been undertaken to identify key risks associated with the establishment and operation of the facility in order to assist with the identification of key environmental issues to be addressed within this EIS.

A qualitative risk analysis was undertaken to identify which environmental issues are considered as "key" environmental aspects. Key environmental issues include those areas of the environment to which the facility poses inherent risks when mitigation measures have not been implemented. In addition, any environmental aspect that requires a complex level of assessment to prove an environmental outcome, either beneficial or adverse, was included as a key environmental aspect.

The following information has been utilised in the assessment:

- EPA Waste Classification Guidelines 2014;
- NSW Waste Avoidance and Resource Recovery (WARR) Strategy 2014-2021;
- Draft New minimum standards for managing construction and demolition waste in NSW; and
- Consultation with stakeholders.

7.2 Risk Assessment Methodology

The qualitative risk assessment identified key environmental aspects using the risk rating presented in Table 8. The assessment calculated a risk ranking based on the likelihood of occurrence of an event and the expected consequence in the case of the event occurring.

Table 8: Risk matrix

		Consequence				
Likelihood		Not-significant 1	Minor 2	Moderate 3	Major 4	Severe 5
Rare	A	L	L	M	H	H
Unlikely	B	L	L	M	H	V
Possible	C	L	M	H	V	V
Likely	D	M	H	H	V	V
Almost certain	E	H	H	V	V	V

(Risk Rating = Likelihood x Consequences)

LEGEND:

L – LOW risk	Responsible Managers need to develop or modify policy or procedure to address the risk. A simple action plan can also be developed.
M – MODERATE risk	Action timeframe determined and Risk Action Plan developed by responsible manager with relevant Director informed of progress.

H – HIGH risk	Action timeframe to be determined in conjunction with the Emergency Management Team (EMT) and Risk Action Plan to be developed by the responsible manager.
V – VERY HIGH risk	Immediate action to be initiated in conjunction with EMT and Risk Action Plans to be developed by responsible manager and implemented immediately.

7.2.1 Estimate of Likelihood and Consequence or Severity of Impact

The criteria for evaluating likelihood and consequence of risks are identified in Table 9 and Table 10.

Table 9: Criteria for evaluating likelihood

Level	Descriptor	Example of Description	Example Frequency of Occurrence
A	Rare	Only ever occurs under exceptional circumstances	Once in more than 20 years
B	Unlikely	Conceivable but not likely to occur under normal operations; no evidence of previous incidents	Between once in 5 years and once in 20 years
C	Possible	Not generally expected to occur but may under specific circumstances	Between once a year and once in 5 years
D	Likely	Will probably occur at some stage based on previous incidents	Between once a month and once a year
E	Almost certain	Event expected to occur most times during normal operations	Once per month

Table 10: Criteria for evaluating consequence

Level	Descriptor	Safety	Financial	Operational	Environmental
1	Not significant	No medical control required	Low financial cost	< 6 hours facility closure or disruption of operations	No environmental harm
2	Minor	First aid only	Medium financial loss	> 6 hours but < 24 hours facility closure or disruption of operations	Release to environment immediately contained
3	Moderate	Medical treatment, lost time to injury or temporary reversible illness	Moderate financial loss	> 24 hours but < 48 hours facility closure or disruption of operations	Release to environment contained with internal assistance
4	Major	Extensive injuries – permanent partial disability or severe lost time to injury	Major financial loss	> 2 days but < 5 days facility closure or disruption of operations	Release to environment contained with external assistance
5	Severe	Death or irreversible disability	Huge financial loss (> $5m)	> 5 days facility closure or disruption of operations	Pollution event with detrimental effect

7.3 Preliminary Assessment

The outcomes of the preliminary environmental risk assessment (assuming no mitigation measures) are presented in Table 11. Consideration of environmental risk also incorporates an assessment of the degree of uncertainty. A higher risk ranking has been assigned to those aspects where there is an element of uncertainty.

Table 11: Preliminary environmental risk assessment assuming no mitigation measures

Issue	Potential Impacts	Comment	Preliminary Risk Ranking	Key Issue?
Soil and water	Disturbance of potential acid sulphate soils (PASS) causing environmental harm	No excavation is required. According to the CSIRO ASRIS mapping tool, there is no known potential for acid sulphate soils. Therefore, the chance of exposing PASS is not expected or likely.	Low	Y
	Erosion of soils from the site resulting in sedimentation within stormwater and natural waterways	The site is already fully covered in hardstand. Activities, including storage of materials, will be conducted inside the building. Collection vehicles will travel on sealed roads, minimising the migration of mud and dust. Migration of particles may occur from stockpiled materials or from discharge of dust particles to air during unloading or loading.	Moderate	
	Discharge of contaminated groundwater from the site	There would be no discharge to groundwater due to the Proposal.	Low	
	Alterations to hydrology on site and stormwater discharge levels from the site	The Proposal would not result in an increase in impervious surfaces at the site and there would consequently be no increase in the stormwater runoff generated. The existing on-site drainage system is adequate for the management of storm water.	Low	
Traffic and access	Increased traffic volumes and frequency, including heavy vehicles	Potential for an additional 32 heavy vehicle movements per day to impact on traffic flow in the local area.	Low	Y
	On-site parking demands	On-site parking is provided in excess of the development's car parking requirements.	Low	
	Reduction in road safety as a result of increased number of heavy vehicles operating on the	The new C&D waste management facility would result in additional trucks accessing the site from Cowpasture Road, increasing the safety risk associated with heavy vehicles.	Moderate	

Issue	Potential Impacts	Comment	Preliminary Risk Ranking	Key Issue?
	road networks around the site			
Waste Management	Waste generation	Waste generated during installation would be minimal due to use of pre-fabricated components. Waste generated through the operation of the site would be limited to office and amenity waste. The C&D waste processed through the facility would not be generated at the site.	Low	Y
	Disruption to operations	Should there be disruptions to operations there is potential to accumulate large quantities of C&D waste materials on the site.	Moderate	
	Receipt of non-conforming waste at the site	Waste that the development consent does not permit to be handled at the site being brought to the site e.g. asbestos.	Moderate	
Noise and vibration	Noise impacts on sensitive receivers from site operations	Operational noise and vibration in relation to loading, unloading of trucks, as well as reversing vehicles and deposition of materials at the facility. Noise or vibration caused by the operation of processing equipment in the facility.	Moderate	Y
Air quality	Odour generated from processing of C&D waste materials	Proposed materials to be accepted by the site are limited to non-putrescible C&D waste, with low potential for odour emissions.	Low	Y
	Air pollution including dust and exhaust emissions	Dust and exhaust emissions caused by the handling of the C&D waste and operation of heavy vehicles.	Moderate	
Biodiversity	Impact on local biodiversity as a result of site operations	The development area is covered by hardstand. No clearing or disturbance of vegetation is necessary.	Low	N
Indigenous heritage	Potential impact on the indigenous heritage of the area	The ground surface has been previously modified. There would be no excavation required.	Low	N

Issue	Potential Impacts	Comment	Preliminary Risk Ranking	Key Issue?
Non-indigenous heritage	Potential impact on the non-indigenous heritage of the area	The site has been previously developed. No disturbance of the ground surface would be necessary.	Low	N
Socio-economic	Potential negative social impacts on the locality due to increased traffic, noise, and air pollution	The Site is located in IN1 –General Industrial Zone within the Fairfield council LGA. The nearest residence is approximately 130m north-west of the site. The proposed operations are of a small scale and unlikely to affect the local community.	Low	N
	Impact on local economy	The C&D waste management facility would provide job opportunities for 14 full-time operational and administrative staff and 10 jobs for drivers. Indirect employment opportunities would be created during the installation of equipment of processing line and ongoing operations.	Low (Net Benefit)	
Visual impact	Potential for decrease in visual amenity of the area	Processing activities would be contained within the existing industrial buildings. Existing lighting would remain unchanged. No screening vegetation would be removed. No large signage is required. The building style of the demountable buildings is constant with the scale and design of the surrounding area.	Low	N
Fire and Hazards	Occurrence of hazards or risks on-site	Potential risks associated with operation of proposed C&D waste management facility may include fuel spills, vehicle movements within the site, delivery of hazardous, non-conforming waste or dangerous goods, fire within the operational buildings and medical emergencies. Management measures are required to reduce risk.	High	Y

To fully assess the impacts, the following specialist studies have been commissioned for the identified key environmental issues listed below and are presented in Section ?:

- Air Quality;
- Noise and vibration;
- Traffic and transport; and
- Fire and Hazards.

Low risk issues that do not require a full analysis are:

- Soils;
- Biodiversity;
- Indigenous Heritage;
- Non-indigenous Heritage;
- Visual Impact;
- Waste management; and
- Socio-economic impact

8. Environmental Assessment

This section contains an assessment of the potential environmental impacts of the Proposal. The assessment includes relevant matters under section 4.15 of the EP&A Act and responds to the SEARs. Appropriate environmental safeguards and mitigation measures are suggested throughout this section.

8.1 Air Quality

8.1.1 Background

An Air Quality Assessment was completed by Todoroski Air Sciences Pty Ltd on 27 August 2018 and has been referred to throughout this section of the EIS. The report is attached in Appendix F.

The main sources of particulate matter in the wider study area are agricultural activities, emissions from anthropogenic sources such as wood heaters and vehicle exhaust and other commercial and industrial activities. Background data was taken by Todoroski Air Sciences from the Prospect monitoring station, operated by OEH. 24-hour PM_{10} and $PM_{2.5}$ and are detailed in Table 12.

Table 12: Particulate levels from NSW OEH Prospect monitoring site (µg/m³)

Pollutant	Annual Average					Maximum 24-Hour Average				
	2012	2013	2014	2015	2016	2012	2013	2014	2015	2016
PM_{10}	17.3	19.2	17.6	17.6	18.9	38.7	81.8	44.3	68.7	110.1
$PM_{2.5}$	-	-	-	8.2	8.7	-	-	-	29.6	84.9

Source: Todoroski Air Sciences, 2018

The annual average PM_{10} concentrations were found to be below the relevant criterion of 25µg/m³ while annual average $PM_{2.5}$ concentrations were above the relevant criterion of 8µg/m³ at Prospect in 2015 and 2016. Maximum 24- average was found to occasionally exceed the NSW EPA 24-hour average goal of 50µg/m^3 and 25µg/m^3 respectively.

In the absence of available data, total suspended particulate matter (TSP) was calculated by Todoroski Air Sciences through the relationship between PM_{10}, TSP and deposited dust concentration. Using the measured annual average PM_{10} concentration of 17.6µg/m^3, an approximate annual average TSP concentration of 63.4µg/m³ and dust deposition value of 2.8g/m^3/month was determined.

Meteorological modelling was based on a combination of the data from the air pollution model and observations of a CALMET model and is described in Section 4.2.6.1 above.

8.1.2 Potential Impacts

8.1.2.1 Dust

Dust is typically classified according to its particle size. Particle size is an important factor influencing the dispersion and transport of dust in the atmosphere and the effects of dust on human health. Dust particles in the atmosphere can be as small as a few nanometres and as large as 100µm.

The main focus of the Air Quality Assessment is to assess if the worst-case air quality impacts would lead to unacceptable levels of environmental harm in the surrounding area. Estimated dust emissions for the project were predicted using a CALPUFF dispersion model, in conjunction with a CALMET generated meteorological data file. Emission estimates for various activities onsite were calculated for total suspended particulates (TSP), PM_{10} and $PM_{2.5}$ emissions by analysing the various types of proposed

activities. These results do not consider any proposed dust mitigation measures. Estimated dust emissions for the Proposal when mechanical sorting has been fully implemented are detailed in Table 13.

Table 13: Estimated annual dust emission rate for the Proposal (kg/year)

Activity	TSP Emissions	PM_{10} Emissions	$PM_{2.5}$ Emissions
Hauling of waste/materials (paved road)	537	103	25
Unloading of materials from truck	32	15	2
Rehandling	32	15	2
Transfer of Materials to Stockpile	32	15	2
Loading to Hopper	32	15	2
Conveying	32	15	2
Screening	250	86	21
Sorting	32	15	2
Rehandling	32	15	2
Transfer of material to stockpile bunkers	32	15	2
Loading to trucks for export off-site	32	15	2
Hauling material off-site	537	103	25
Wind erosion of the site	1,612	806	121
Total emissions	**3,227**	**1,235**	**212**

Source: Todoroski Air Sciences, 2018

The Air Quality Assessment considered the impact of particulates on sensitive receptors in the vicinity of the site. A summary of the cumulative annual average $PM_{2.5}$, PM_{10}, TSP and dust deposition is given in Table 14.

Table 14: Maximum annual dispersion modelling for sensitive receptors – cumulative impact

Pollutant	Maximum incremental impact at receptor	Background concentration	Maximum cumulative impact at receptor	Criteria	Units
$PM_{2.5}$	0.1	8.2	8.3	8	$\mu g/m^3$
PM_{10}	0.3	17.6	17.9	25	$\mu g/m^3$
TSP	0.7	63.4	64.1	90	$\mu g/m^3$
DD	0.1	2.8	2.9	4	$g/m^2/month$

Source: Todoroski Air Sciences, 2018

The results indicate that the cumulative levels would be below the relevant criteria for PM_{10}, TSP and dust deposition levels at the sensitive receptor locations. The predicted cumulative $PM_{2.5}$ levels exceed the 8µg/m^3 criterion by 0.2 µg/m^3. This is due to the fact that the applied background concentration is already above the criterion. The predicted incremental $PM_{2.5}$ impact from the Proposal is minimal, 0.1 µg/m^3, or 1% of the 8µg/m^3 criterion. The contribution from the Proposal is unlikely to be discernible above existing background levels.

Total (cumulative) 24-hour average $PM_{2.5}$ and PM_{10} background dust levels are close to, or exceeding the criteria, and, whether the facility is operating or not there would be an exceedance of the relevant limits. The assessment therefore applied a Level 2 contemporaneous approach to examine the potential maximum total (cumulative) 24-hour average $PM_{2.5}$ and PM_{10} impacts in worst-case scenarios. The results of the level 2 assessment indicate that there would be no additional days above the 24-hour average at any of the sensitive receptors as a result of the Proposal.

Air dispersion modelling is considered to be conservative as it does not take into account the dust mitigation measures that will be implemented. The results of modelling indicate that there would be negligible impacts for dust and that the Proposal would not lead to any unacceptable level of environmental harm in the surrounding area. Nevertheless, mitigation measures have been proposed below.

8.1.2.2 Odour

Strong and offensive odours result from chemical compounds in a gaseous form which stimulate the sense of smell. Waste materials which are putrescible, such as food and other organics, generate offensive odours during decomposition, whereas inert materials would not be considered to be particularly odorous. The proposed source materials are dry and inert and have limited capacity to generate offensive odours.

All loads would comprise non-putrescible construction waste and therefore the Air Quality Assessment by Todoroski determined that the potential for odour impacts would be low. Any loads identified as malodourous would be rejected at the inspection stage.

8.1.3 Safeguards and Management Measures

The proposed safeguards and management measures in terms of dust suppression for the development are listed below:

- All handling activities (unloading, processing and storage) would be carried out within the industrial shed;
- During dry and windy weather, conditions would modify the method of working e.g. the door will be closed during operation of the facility to prevent spread of dust;
- Engines of on-site vehicles and plant would be switched off when not in use;
- Vehicles would be maintained in accordance with manufacturer's specifications;
- The amount of material stockpiled would be minimised;
- A sweeper would be used in the sorting area to minimise dust build-up;
- Sealed haul roads would be maintained using a sweeper;
- A site speed limit would be imposed;
- Vehicle loads would be covered when transporting offsite;
- A water mist dust suppression system would be installed to be used during sorting operations;
- Doors to sorting floor would be closed during activities which would generate high levels of dust, and;
- Loads containing putrescible materials would be rejected at the primary inspection stage.

Due to the nature of the waste to be processed, it is considered that the development would have no impact on dust and odour emissions. Implementation of mitigation measures would improve dust suppression and minimise impacts.

8.2 Noise

The *EPA Acoustic Planning Guidelines, Noise Policy for Industry (EPA 2017)* applies to scheduled industrial premises, including waste processing facilities. The policy aims to ensure noise impacts associated with the Proposal are evaluated and managed in a consistent and transparent manner.

An Acoustic Report was prepared by Koikas Acoustics Pty Ltd to determine the impacts of the proposed development on the nearby receivers. The report is included in Appendix G.

8.2.1 Existing Environment

The nearest sensitive receiver is the residential dwelling at 5 Trivet St, located approximately 130m from the facility, as shown on Figure 17. The predominant land use near the site is industrial (zoned IN1), which typically results in noise from plant and machinery as well as frequent vehicular movements. Land to the west of Cowpasture Road is unzoned, being part of the Western Sydney Parklands (*State Environmental Planning Policy (Western Sydney Parklands) 2009*).

The report considered three background noise levels, which relate to the modes of operation at the site and day/evening/night hours. The proposed operation would require trucks to leave the site between 6am and 7am (night). The facility would operate from 7am to 6pm (day).

Ambient noise levels were recorded by Koikas Acoustics by installing a noise logger over 7 days. Results are shown in Table 15.

Table 15: Summary of Environmental Noise Levels

Location	Period	Ambient Noise LAeq Period	Background Noise (RBL)
Trivet St Wetherill Park	7am to 6pm (day)	65	44
	6pm to 10pm (evening)	60	37
	6am to 7am (night)	65	49

Source: Koikas Acoustics 2018

8.2.2 Noise Impacts

8.2.2.1 Fit Out

Noise generated during the installation of plant and equipment would comprise traffic movements, loading and unloading of plant and equipment, and the use of small scale equipment such as forklifts, scissor lifts and hand-held power tools.

The fit out of the C&D waste processing equipment would occur over approximately 6 weeks, including the delivery of pre-fabricated equipment during the initial two weeks. It is expected that on average one semi-trailer would arrive per working day to deliver the steel work and parts.

Installation works would be carried out within the recommended standard hours specified by the NSW Interim Construction Noise Guideline:

- Monday to Friday 7am to 6pm;
- Saturday 8am to 1pm; and

- No work on Sundays or public holidays.

Considering the minor works required, short timeframes required for completion of works, significant distance from nearest sensitive receivers and conformance with daytime working hours, noise impacts due to installation activities are not expected or likely. Should noise complaints be received, Pronto Bins would seek measures to address the issues and minimise noise through limiting continuous noise emissions and/or orientating the noise source away from the receiver.

8.2.2.2 Operation

Operational noise would be generated by vehicle movements, loading and unloading and plant and machinery. Noise is assessed against background noise levels for daytime night time and evening. as shown in Table 15.

The design criteria in the Noise Policy for Industry (2017) define project intrusiveness by the project noise trigger level. The trigger level is the point above which a noise emission would trigger a management response. It is assessed as L_{Aeq} over the worst 15 minute period.

Using the background noise levels, Koikas Acoustics calculated the noise trigger level at the nearest sensitive receptor to be:

- 49 dB(A) for daytime hours, and;
- 53 dB(A) for night time hours.

For industrial premises the project is assessed to an amenity noise level of 70 dB(A).

The sleep disturbance criteria were also calculated as:

- maximum level over 15 minutes - 54dB(A) $L_{Aeq\ 15\ minutes}$; and
- maximum background level - 64dB(A)L_{Amax}

There are three potential sources of noise impacts from the Proposal:

- Noise from the building due to materials drop off, loading and moving materials, and the mechanical process line;
- Traffic noise from vehicles delivering and removing the waste; and
- Plant used to ventilate the site.

No details of ventilation equipment were available, however, the Acoustic Report considered that, due to the distance from the closest sensitive receptors, noise emissions from a ventilation system would not be audible at the nearest residences.

The noise levels expected from activities on the site are presented in Table 16.

Table 16: Noise power levels on site

Activity	Noise power level (dB)
Vibrating screen	106
Truck dumping materials	102
Excavator loading material into hopper	106
Loader moving materials into trucks	99
Trucks entering and leaving Site 10kph (LEQ)	91
Trucks entering and leaving Site 10kph (LMAX)	107

Source: Koikas Acoustics 2018

Two assessed receiver locations were chosen to determine if impacts would occur at the closest residential property and at the closest industrial premises. These are:

- 5 Trivet St; and
- 105 to 113 Cowpasture Rd.

Daytime receiver noise levels

The results of noise modelling at these locations indicate that the predicted noise level for the most affected point of the residential property (approximately 20 metres from the residence) is 49 dB(A), which does not exceed the project trigger level of 49 dB(A).

The most affected point of the industrial premises is 60 dB(A), which is well below the industrial noise level of 70dB(A).

The predicted noise levels are likely to be conservative as they assume that all noise generating equipment and practices would be occurring at the same time.

Early Morning/Night Time

The residential noise level for trucks leaving the premises is predicted to be 34dB(A), which does not exceed the project trigger level of 53 dB(A).

The maximum noise level at the residential receiver for trucks entering and leaving the site is predicted to be 57-59 dB(A), which does not trigger the management level for sleep disturbance of 64dB(A). No further investigation into sleep disturbance is therefore required.

The noise level at the industrial premises would be 46 dB(A), which would be well below the industrial noise limit of 70 dB(A).

The noise assessment report indicates that the proposal will meet relevant EPA noise planning guidelines such that the noise levels to nearby residential and industrial receivers will not affect existing amenity.

8.2.3 Vibrational Impacts

Individuals can detect building vibration values that are well below those that can cause any risk of damage to the building or its contents. Given that there is substantial setback from the nearest receivers and that the scale of the plant is relatively minor, the risk of impact from vibrational sources was considered low and a vibrational impact assessment was not deemed necessary.

8.2.4 Safeguards and Management Measures

The site would not exceed any noise criteria for daytime or night-time hours at the residential properties or the nearby industrial sites.

Nevertheless, the following safeguards are proposed to mitigate noise impacts on site:

- Installation work will be restricted to standard construction hours;
- Operational hours to be restricted to 6am and 6.00pm Monday to Friday and 6am to 4pm on Saturdays;
- All equipment used on the site will be selected and operated to minimise noise where feasible;
- Equipment would be maintained to minimise vibrational impacts;
- All operations will take place inside the industrial shed;
- Training will be provided for operators regarding potential noise problems;
- Public address systems will not be used on site; and
- Noise complaints would be recorded in a complaints register and reasonable measures would be taken to reduce impacts.

The development would meet the EPA noise planning guidelines and would have no resulting amenity impacts due to noise or vibration on the surrounding area.

8.3 Water

This section contains information regarding the water drainage and management systems relevant to the site. Particular attention is given to the prevention methods for sediment entering the stormwater system, including clean-up frequency.

A Surface Water Management Report (see Appendix H) was completed by Storm Consulting to assess the potential impacts of the facility. The focus of the report is to assess the hydraulic performance and discharge standard of the facility. The assessment includes a surface flow assessment using DRAINS and water quality modelling using MUSIC.

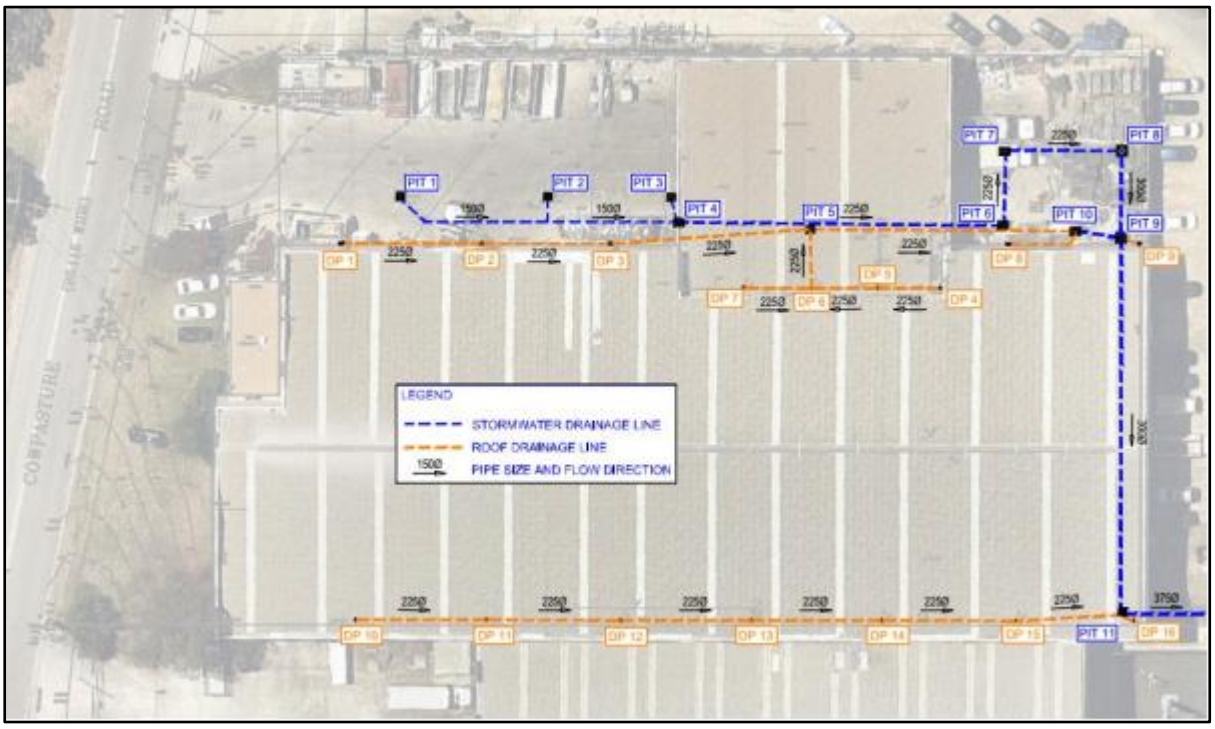
8.3.1 Existing Environment

8.3.1.1 Existing Drainage System

In accordance with the conditions of DA 683/95, existing water management at the site, including on-site detention, has been designed to satisfactorily dispose of stormwater. The system is depicted in Figure 20 and consists of:

- A drainage line of surface inlet pits 1 to 11 to cater for ground surface;
- 2 additional drainage lines (DP 1 to Pit 11 and DP 10 to Pit 11) which collect from the northern and southern sections of the roof;
- Combined drainage is discharged from the site via the outlet pit (Pit 11);
- Galvanised mesh plates have been installed on the detention pits to fully protect them from litter ingress; and
- An interconnecting system of underground stormwater pipes has been installed to channel stormwater through pits and basins installed on the site to the council stormwater system at the south-east corner of the property.

Figure 20: Existing stormwater network



Source: Storm Consulting 2018

8.3.1.2 Surface runoff modelling

The site was modelled for 5-year, and 100-year ARI events. For the 5-year ARI event, overland flows were found to range from 0 to 8L/s.

For the 100-year event, modelling was performed for the general site and, in particular, for the warehouse floor. The flow modelling resulted in a maximum flow depth of about 70mm and a maximum DV product (depth x velocity) of 0.02. For the 100-year ARI event, the warehouse floor level was also found to have a freeboard of about 1.15m above the flood level. No changes to the existing runoff would occur as a result of the proposed development.

Table 17: Modelling results for proposed conditions

ARI event	Location	Level (m AHD)	WSL (m)	Comment
5-year	Site and warehouse	N/A	N/A	No flooding
100-year	General site	64.35	64.42	70mm flow depth
100-year	Warehouse building floor level	65.57	64.42	No flooding, 1.15m freeboard

Source: Storm Consulting 2018

8.3.2 Potential Impacts

The Proposal does not involve the disturbance of ground and therefore there would be no changes to hydrology, no geomorphic activities resulting in increases to sediment or runoff and no disturbance to ASS or potential ASS. The activities involve sorting of dry, inert materials and would be carried out within the existing shed structure. There would be no potential for the discharge of effluent or nutrient-rich wastewater either to ground or drainage systems.

8.3.2.1 Site water use

A misting spray would be installed to reduce the impact of dust at the site. The mist would cause small droplets of water to capture particulates and prevent fugitive dust, with the moisture evaporating in the process. The consumption of water through the installation of a misting spray system would be at approximately 30 litres per minute of use. It would not result in sufficient quantity to impact on the water use of other consumers or to result in discharge to sewer or stormwater systems. Licensing under the *Water Management (WM) Act 2000* or the *Water Act 1912*, or a consent to discharge industrial trade wastewater would therefore not be required.

8.3.2.2 Stormwater management

Inadequate storm water management systems have the potential to cause on-site flooding and water pollution through:

- Ineffective stormwater management, i.e. improperly maintained hardstand pad, bunds, and stormwater drains;
- Stormwater volumes being in excess of the design capacity of stormwater controls resulting in an uncontrolled release and surcharging of the local drainage system;
- Sediment entering the stormwater system and discharging downstream.

A visual inspection by Storm Consulting and discussion with the site tenants indicated that the performance of the existing stormwater system is adequate with no evidence of flooding or local ponding and no recollection of such within the last two years.

Stormwater modelling by Storm Consulting for the 5-year ARI event resulted in surface water flow of 0 to 8L/s. This level of flow is not expected to have any adverse impact on site operations and safety.

For the 100-year event, the results of a maximum flow depth of about 70mm and a maximum DV product of 0.02 are not expected to cause any problems with flooding. The DV product is considerably less than Council's safety requirement of a maximum DV of 0.4 and is therefore considered to be of low hazard. The warehouse floor level having a freeboard of about 1.15m above the flood level indicates that processing and storage areas are above flood levels. The analysis was performed with a blockage factor of 50% and is therefore conservative.

No impacts of flooding are therefore expected or likely. In order to maintain flow regimes, inlet pits should be inspected regularly and kept free of debris.

8.3.2.3 Surface water quality

The Fairfield City Council *Stormwater Management Policy* outlines performance criteria for stormwater quality improvements that apply to development within the Wetherill Park Industrial Estate, however, these controls only apply if the impervious area is increased. The proposal does not include an increase to the impervious area, and therefore the criteria do not apply. They have nevertheless been considered in the Stormwater Report to demonstrate the level of compliance.

The Australian and New Zealand Environment Conservation Council (ANZECC) also publishes guidelines for fresh and marine water quality. 'Managing Urban Stormwater: Soils and Construction' (The Blue Book) is published by Landcom for minimising erosion and sedimentation potential.

Surface water quality may be affected by the migration of dust particles into the existing drains and stormwater systems as a result of the facility's operations.

Two scenarios were modelled by Storm Consulting:

Option 1: Installation of *Enviropod* filters to trap and retain sediment on all existing pits; and
Option 2: Installation of *Enviropod* filters on all existing pits and a *StormFilter* on pit 11 to further treat total phosphorus (TP) and total nitrogen (TN).

Using Enviropods only would result in the retention of up to 79% of total suspended solids (TSS) generated onsite. This would effectively meet the Council criterion of 80% of for total suspended solids but not those for phosphorus or nitrogen, while using Enviropods and Stormfilters would achieve significant improvements to water quality and meet Council targets for all constituents, as shown in Table 18. Council targets are included here as a reference, but are not a requirement for this development.

Table 18: Effectiveness of stormwater quality treatment guidelines

Option	Pollutant	Reduction (%)	Council's target (%)
Option 1 Enviropods (at all pits)	Gross pollutants	100	90
	TSS	79	80
	TP	30	55
	TN	21	40
Option 2 Enviropods & StormFilter	Gross pollutants	100	90
	TSS	92	80
	TP	70	55
	TN	50	40

Source: Storm Consulting 2018

The results were also compared to the ANZECC and Blue Book guidelines. The results indicate that without any management options in place, the pollutant concentrations are slightly above ANZECC Guideline trigger levels for TP and TN, but below NSW Blue Book (Soils and Construction) levels for TSS. The results also show that either Option 1 or Option 2 would be effective in reducing the concentrations to well below the guideline levels, as shown in Table 19.

Table 19: Effectiveness of Stormwater treatment options to ANZECC guidelines:

Pollutant (Mean)	Existing Conditions[c]	Option 1	Option 2	ANZECC Guidelines[a]
TSS (mg/L)	12.70	3.65	0.310	50[b]
TP (mg/L)	0.064	0.045	0.0065	0.05
TN (mg/L)	0.539	0.426	0.191	0.5

a: Default trigger values for lowland slightly disturbed ecosystems

b: NSW Blue Book for Soils and Construction

c: As there is no land use change, the results under proposed development conditions are the same as those under existing conditions

Option 1: Enviropods only at all the pits

Option 2: Enviropods and StormFilter at Pit 11 outlet

TN: Total Nitrogen

TP: Total Phosphorus

TSS: Total Suspended Solids

Source: Storm Consulting 2018

Pronto Bins intends to install Enviropod filters at all inlet pits, except Pit 5 which has a concrete cover, to improve stormwater quality to achieve water quality levels consistent with the ANZECC and *Managing Urban Stormwater: Soils and Construction* guidelines.

8.3.2.4 Containment of spills and leaks

The management of hazardous substances has been outlined in Section 8.6.3. The expected quantities of hazardous materials to be located on site are 2,200 litres of diesel fuel and 205 litres of hydraulic oil.

Diesel fuel would be stored in a self-bunded tank compliant with *Australian Standard 1940:2004: The storage and handling of flammable and combustible liquids*. The diesel tank will contain an alarm, overfill protection valve and automatic cut-off.

Hydraulic oil would be stored in a single drum, placed in a single container bund. The capacity of bunding would be at least 110% of the largest tank/container within that bund.

A spill kit will be available to clean up spills and leaks. Staff at Pronto Bins will be trained in the use of the spill kit.

8.3.2.5 Wheel wash

A wheel wash is installed at sites which have the potential to track mud, dust, or organic material onto the road and causing migration of sediments and contaminants.

Dust at the premises would be controlled by keeping the concrete driveways swept and clean, loading and unloading within the existing shed and using dust suppression sprays. The maximum processing capacity of 20,000 tpa is not considered to be of a scale that warrants the installation of a wheel wash.

8.3.3 Safeguards and Management Measures

To ensure the integrity of the stormwater system as designed, the following management measures are proposed:

- Installation of Enviropod filters on all inlet pits except Pit 5;
- Regular inspection and maintenance of drains, hardstand areas and grids;
- Regular cleaning of drains, pits and filtration systems;
- As detailed in Section 8.5, particular attention to be paid to ensure the stormwater system is kept free from waste and debris from operations;
- Bunding of hazardous substances including diesel and hydraulic oil;
- Regular inspections of hazardous substance containment, including valves, pumps, pipes and hoses;
- A spill kit would be made available and staff would be trained in its use;
- Standard operating procedures would be implemented in the event of an on-site or off-site emergency; and
- Fire-fighting equipment will be available onsite.

The potential for impacts to stormwater is very low and would be further minimised through filtration at inlet pits and management of the site.

8.4 Soil and Contamination

8.4.1 Existing Environment

The site has been previously cleared and the operational area is covered in hardstand. No disturbance to the ground is required as there would be no construction or demolition works and no excavation. Installation of equipment and machinery will be within the existing shed.

8.4.2 Potential Impacts

8.4.2.1 Soils

Considering that the development does not require disturbance to the soil, any impacts, including erosion, sedimentation, or the disturbance of contaminated soils (including ASS or PASS) are unlikely.

The processing of dry, inert materials would not result in discharge to land of any contaminants. Processing activities will be contained within the existing building where materials will be delivered, sorted and dispatched. Both recovered waste and residuals will be transported to facilities which are licensed to receive that type of waste and will not be illegally dumped.

8.4.3 Safeguards and Management Measures

- No disturbance of soil is required for the development; and
- Recovered and residual materials will be transported to a facility that is licensed to receive that type of waste and will not be illegally dumped.

The proposed development does not present a likelihood of disturbance to contaminated soils, discharge to land of contaminants or causing soil erosion.

8.5 Waste Management

The receival and sorting of C&D materials has the intention of increasing reuse and recycling and reducing disposal to landfill, in accordance with the *WARR Strategy 2014-2021*. The overall impact of the proposed sorting and management of C&D waste is a net gain for the environment and an increase in the availability of recovered resources.

The C&D waste types to be received for processing are classified as general solid waste (non-putrescible), according to the EPA Waste Classification Guidelines. The method of handling C&D waste is described in Section 3.4.

Waste generated at the site would consist of minor quantities of office and food consumption wastes. Bins would be provided at sizes sufficient for the containment of waste generated on the premises. Waste and recycling would be removed by a regular collection service.

8.5.1 Potential Impacts

The process of receival, tipping and sorting of waste has the potential to cause the generation of wind-blown litter. Litter would be adequately managed by containment within the shed, installation of litter and sediment controls on drains and regular litter clean up.

8.5.2 Safeguards and Management Measures

The following safeguards and management measures would be employed for the site:

- All waste including materials inputs and waste generated through the operation of the facility would be recycled where possible;

- The unloading of vehicles and processing of waste will take place within the industrial shed where litter can be readily contained;
- A daily clean-up of the site, both outside and inside will occur at the end of each work day. If conditions are particularly windy, more frequent clean-up will occur; and
- All drains on site are fitted with a grate which will be checked weekly for litter.

With the above-mentioned safeguards in place, it is anticipated that the potential for pollution of the environment with waste or litter is low.

8.6 Fire and Hazards

8.6.1 Background

Key hazards and risks for the development are associated with the operation of the facility and include:

- Fuel spills;
- Vehicle movements within the site;
- Delivery of hazardous, non-conforming waste or dangerous goods;
- Fire within the operational buildings; and
- Medical emergencies.

Currently the potentially hazardous substances shown in Table 21 are stored on-site.

8.6.2 Potential Impacts

8.6.2.1 Operational Risk Assessment

The proposed method of operation of the facility is described in Section 3. The following potential hazards to the environment and/or public health have been identified in relation to the operation of the facility:

- Traffic accidents resulting from the interaction between heavy vehicles and other vehicles and pedestrians;
- Disruption of operations;
- Structural damage to the industrial buildings as a result of the operation of trucks and heavy machinery within the buildings;
- Health and respiratory pollution as a result of dusty loads;
- Non-conforming waste, including the receipt of dangerous goods/hazardous substances at the site;
- Spills – liquid/solid (e.g. fuel tank leaks);
- Fire/ explosion – electrical/chemical (e.g. fire from adjacent sites; fire in the waste trucks entering the site; or fire initiated on-site by vehicle accident, equipment or by discarded matches or naked flames; electrical faults); and
- Equipment failure.

Table 20 provides a summary of the potential hazards identified as part of the operational risk assessment, the risk associated with the hazard and the proposed mitigation strategy that would be adopted to address the hazard, along with the relevant standard or guidance document that would be used in the development of the procedure or engineered control.

Table 20: Hazard scenarios and consequences associated with the activities and facilities

Hazards/aspect	Risk	Management standards and guidelines
Truck unloading waste into receival area	Loss of control, vehicle accident, impact on other vehicles, plant or	• An Environmental Management Plan (EMP) prepared in accordance with *AS3745 – 2010 Planning for emergencies in facilities.*

Hazards/aspect	Risk	Management standards and guidelines
	pedestrians.	• Operators to be licensed and competent.
Use of excavator and loader to move waste to conveyor	Loss of control, vehicle accident, impact on other vehicles, plant or pedestrians.	• EMP prepared in accordance with *AS3745 – 2010 Planning for emergencies in facilities* • Operators to be licensed and competent.
Diesel fuel (class C1) storage tank – fire, storage tank failure, spills	Fire, release of dangerous goods, skin contact	• Fuel would be stored in a well-ventilated area. • EMP prepared in accordance with *AS3745 – 2010 Planning for emergencies in facilities* • Storage in a bunded tank. • *AS1940:2004: The storage and handling of flammable and combustible liquids* • An Emergency Response Plan (ERP) to be included in the Incident Response Procedure (IRP), including fire response procedure. • Appropriate PPE to be supplied and worn. • A spill kit would be provided to clean up spills. • Containment would be regularly inspected for leaks and deterioration.
Hydraulic oil (class C2) - fire, storage tank failure, spills	Fire, release of dangerous goods, skin and eye contact	• EMP prepared in accordance with *AS3745 – 2010 Planning for emergencies in facilities* • *AS1940:2004: The storage and handling of flammable and combustible liquids* • ERP to be included in IRP, including fire response procedure. • Appropriate PPE to be supplied and worn. • A spill kit would be provided to clean up spills. • Containment bunds to be regularly inspected for leaks and deterioration.
Non-conforming waste	Exposure to hazardous substances	• A Waste Management section would be incorporated into the EMP.
Dust generated from operating equipment, waste handling, vehicle movements	Respiratory and skin health impacts	• A Dust Management section will be developed within the site EMP. • A dust suppression system would be installed during stage 2 of operations to control emissions.
Vehicle exhaust generated from movement of truck and front-end loader in enclosed building	Respiratory and skin health impacts	• Appropriate vehicle maintenance schedules would be strictly adhered to. • Shed ventilation.
Fire - caused by machinery malfunction, electrical failure,	Fire, explosion	• Restriction of smoking areas. • EMP prepared in accordance with *AS3745 – 2010 Planning for emergencies in facilities.* • Provision of sufficient fire suppression

Hazards/aspect	Risk	Management standards and guidelines
ignition of fuel spill, waste truck delivery fire, storage of combustible materials.		systems around the waste storage area. • Installation of a fire hose reel with foam attachment and 20-litre drum of foam adjacent to bunded diesel tank area. • Routine service of fire protection systems and equipment. • ERP to be included in IRP, including fire response procedure.

8.6.3 Combustible waste

Combustible waste that may be received at the facility includes paper, cardboard, wood, plastic, rubber and, organic material. The aggregate quantity of these products to be stockpiled will vary according to the source of materials. An approximate quantity of combustible materials stored onsite at any one time would be 20 tonnes. Firefighting equipment would be provided and staff trained in use to mitigate the risk of stockpile fires.

8.6.4 Hazardous substances

Table 21: Potentially hazardous substances currently stored at the Site

Substance	Quantity	Dangerous goods class	Storage method and location
Diesel fuel	2,200L	C1: Flammable liquid	Self-bunded tank for diesel storage.
Hydraulic Oil	205L	C2: Combustible liquid	Storage away from ignition sources in a 205L drum.

The quantities of fuel proposed to be stored on-site for machinery use are well below the threshold quantities of *Applying SEPP 33* (*DoP, 2011*). Hazardous substances would be stored separately and in approved containers and bunds. 2,200 litres of diesel fuel and 205 litres of oil are not considered to be potentially hazardous when stored within a storage area where there are no other flammable materials. A self-bunded diesel tank compliant with *Australian Standard 1940:2004: The storage and handling of flammable and combustible liquids* would be used for the storage of the diesel. The diesel tank will contain an alarm, overfill protection valve and automatic cut-off. Hydraulic oil would be stored in a single drum, placed in a single container bund. The locations of these substances on site are shown on the site plans in Appendix A. The diesel fuel and the hydraulic oil have been placed between an inside wall and behind a front barrier to protect them from any possible impact risk.

8.6.5 Fire Risk Management

The site is currently equipped with a fire hydrant, fire sprinkler system, automatic smoke detection and alarm. The shed which would be used for waste storage and processing has 3 fire extinguishers, situated near each door. Exits are provided from the warehouse via three doors to the exterior of the building and an additional egress through the office space. Two exits from the office space are also provided, as shown on the site plans in Appendix A.

The facility was previously classified under the National Construction Code as:

- Class 5 building – office; and
- Class 7b building –storage.

The proposed change of use would result in a change in the building classification of the premises to:

- Class 5 building – office, and
- Class 8 building –processing.

Clause 131 of the *Environmental Planning and Assessment Regulation, 2000* indicates that Category 1 fire safety provision is required for a change of use whether or not building works are carried out. Category 1 fire safety provisions are provided in Volumes One and Two the *Building Code of Australia* (BCA*)* under the following sections:

- EP1.3 A fire hydrant system must be provided to the degree necessary to facilitate the needs of the fire brigade appropriate to— (a) fire-fighting operations; and (b) the floor area of the building; and (c) the fire hazard.
- EP1.4 An automatic fire suppression system must be installed to the degree necessary to control the development and spread of fire appropriate to— (a) the size of the fire compartment; and (b) the function or use of the building; and (c) the fire hazard; and (d) the height of the building.
- EP1.6, Suitable facilities must be provided to the degree necessary in a building to co-ordinate fire brigade intervention during an emergency appropriate to— (a) the function or use of the building; and (b) the floor area of the building; and (c) the height of the building
- EP2.1 is not relevant as it pertains to buildings which provide accommodation.
- EP2.2 provides for evacuation of the building.
- EP3.2 is not relevant as it applies to passenger lifts.
- P2.3.2 is not relevant as the building is not Class 1.

The BCA is part of the National Construction Code (NCC 2016). Deemed to satisfy provisions are supplied in Sections E1.1 to E1.10 in Volume 1 of the BCA and E2.1 to E2.3 in Volume 2 of the BCA. Not all provisions are relevant to the building type. The relevant provisions and compliance measures are outlined in Table 22, below.

Table 22: Fire safety provisions

NCC 2016 Section	Compliance
E1.3 Fire Hydrants	Fire hydrant is supplied with flow rates of 1,200L/min
E1.4 Fire Hose Reels	Fire hose reels have been provided as shown on the plans in Appendix A
E1.5 Sprinkler Systems	According to table E1.5, a sprinkler system is not required. A sprinkler system is, however, already installed.
E1.6 Portable fire extinguishers	Three portable fire extinguishers have been installed.
E2.1 – 2.3	An automatic smoke detection and alarm has been installed. The maximum distance from any part of the building to an exit is approximately 40 metres. In case of a fire, evacuation would be assisted by the internal ceiling height, an automatic fire sprinkler system and distance to exits. Evacuation routes would be indicated on the floor of the building and maintained so that they are clear of obstruction.

8.6.6 Safeguards and Management Measures

- Management Measures have been outlined in Table 20
- Hazards and risks would be minimised through the implementation of an EMP;
- A dust suppression system would be provided in the waste handling area;
- Diesel would be stored in a self-bunded tank;

- Hydraulic oils would be stored within a bund;
- Containment of fuels and oils would be regularly inspected for leaks and deterioration;
- Sufficient fire suppression equipment would be provided in the waste storage area;
- A hose reel with foam attachment would be provided in the vicinity of the fuel storage area;
- Fire equipment would be routinely serviced;
- Evacuation routes would be maintained for occupants to evacuate the building;
- Vehicles would be regularly maintained;
- Staff would be trained in emergency response ;and
- Additional measures would be outlined in a site-specific EMP.

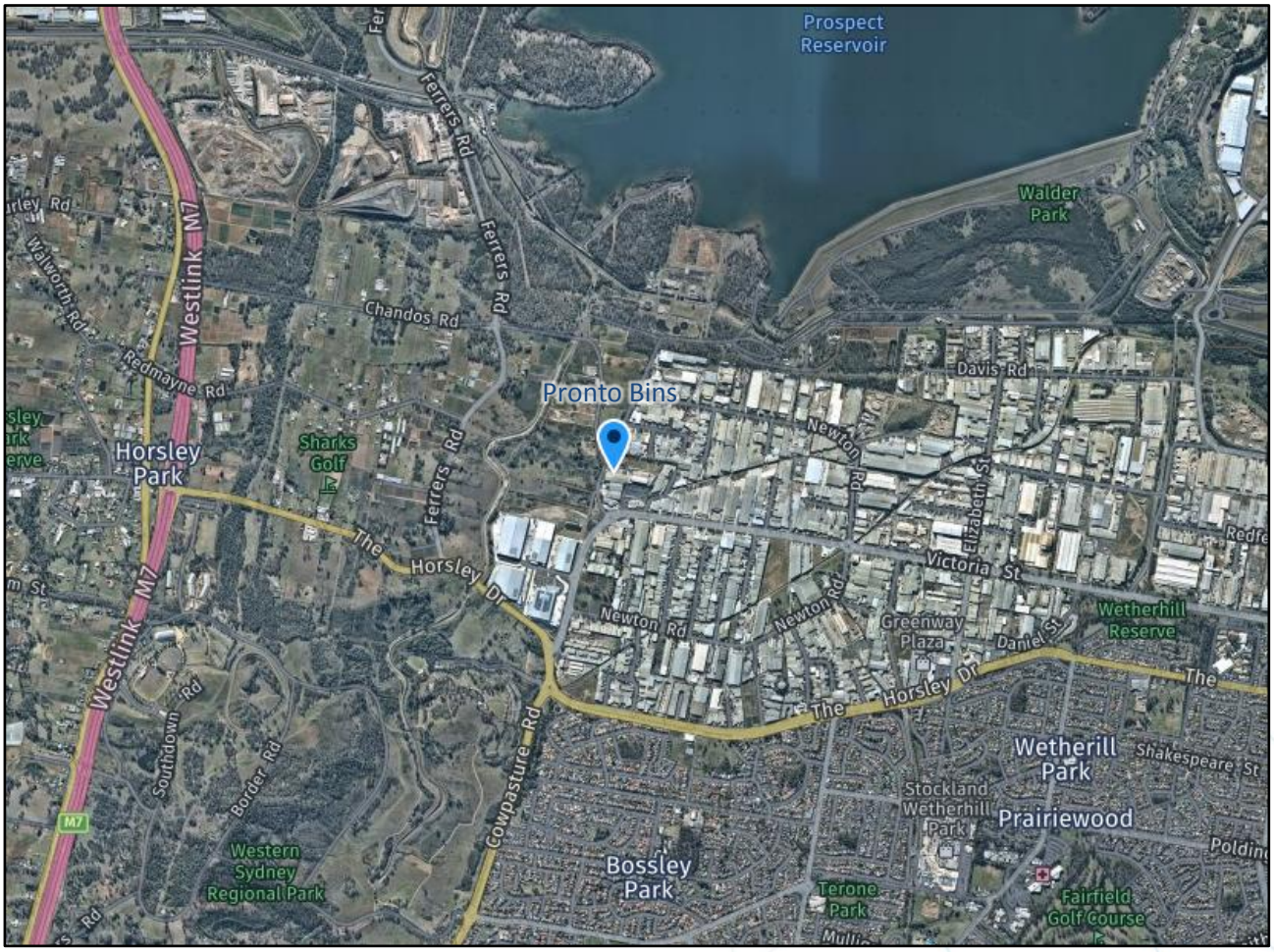
With the implementation of safeguards and management measures, hazards and risks associated with the operation of the facility would be minimised.

8.7 Traffic and Transport

8.7.1 Existing Environment

Cowpasture Road is linked to Greater Sydney by arterial roads such as Cowpasture Road (south of The Horsley Drive), The Horsley Drive, Cumberland Highway, Westlink M7 and Wallgrove Road. Sub-arterial roads in the vicinity of the site include Ferrers Road, Victoria Street and Elizabeth Street, as shown on Figure 21.

Figure 21: Arterial and main roads providing access to the site



The site is provided with a split driveway approximately 12m wide at the north-western end of the property. Traffic, parking and access on development sites are managed through Section 9.2 of Fairfield City Council's Citywide DCP 2013. The DCP endeavours to ensure that environmental amenity is maintained, that access is provided to a design standard and that there is provision for car parking.

EB Traffic Solutions was engaged by MRA to complete a Traffic Impact Assessment Report. The report considers the implications of the Proposal on traffic, car parking, transport and access and has been summarised in the following sections and is included in Appendix I.

This EIS also sources information from the Traffic Impact Assessment report which was completed by Ason Group for the development of the Proposed Horsley Drive Business Park Stage 2 (2016), as published on the NSW Planning and Environment Major Projects website.

8.7.2 Existing traffic

8.7.2.1 Current daily traffic movements

Cowpasture Road

Cowpasture Road in the vicinity of Pronto Bins is a collector road which carries 2 lanes of traffic. Traffic movements are characterised by a variety of heavy to light vehicles utilising Cowpasture Road at moderately frequent intervals. The volume of traffic is minimal as it only provides access to a small section of the industrial area and is not a thoroughfare to other locations.

South of the intersection between Cowpasture Road and The Horsley Drive roundabout, Cowpasture Road is an RMS State Road (MR 648), at which point it carries approximately 29,000 vehicles per day (vpd).

The Horsley Drive

The Horsley Drive is an RMS State Road (MR 609) that runs in an east-west direction between the Hume Highway to the east, and Wallgrove Road to the west. It generally consists of 2 lanes of traffic on each direction and carries approximately 20,000vpd.

Westlink M7 Motorway

Westlink M7 is a major arterial road to the west of the site that provides Sydney with key links to the M2, M4 and M5 motorways. It carries approximately 70,000vpd, with 2 lanes of traffic in each direction.

Wallgrove Road.

Wallgrove Road runs in a north-south direction, generally parallel to the Westlink M7 at Horsley Park. It is a classified Road (MR 515) which carries approximately 20,000vpd.

Newton Road

Newton Road is a local road that joins Cowpasture Road both to the north and the south of the development site. It has a single lane in each direction.

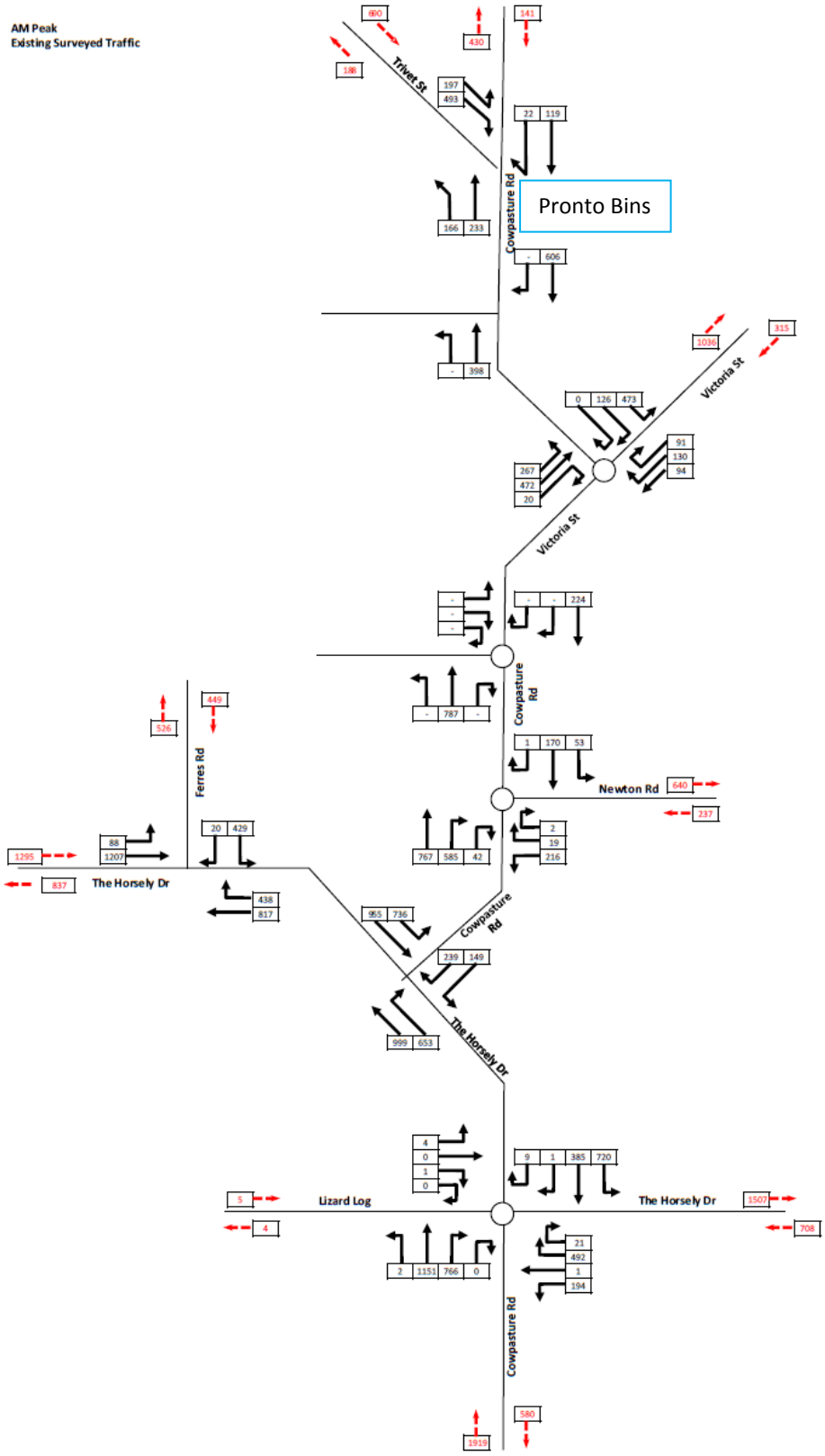
Victoria Street

Victoria Street is a regional road (RR7153) which runs in an east-west direction, linking Cowpasture Road and Warren Road. It is a divided road with one lane in each direction.

8.7.2.2 Peak traffic movements

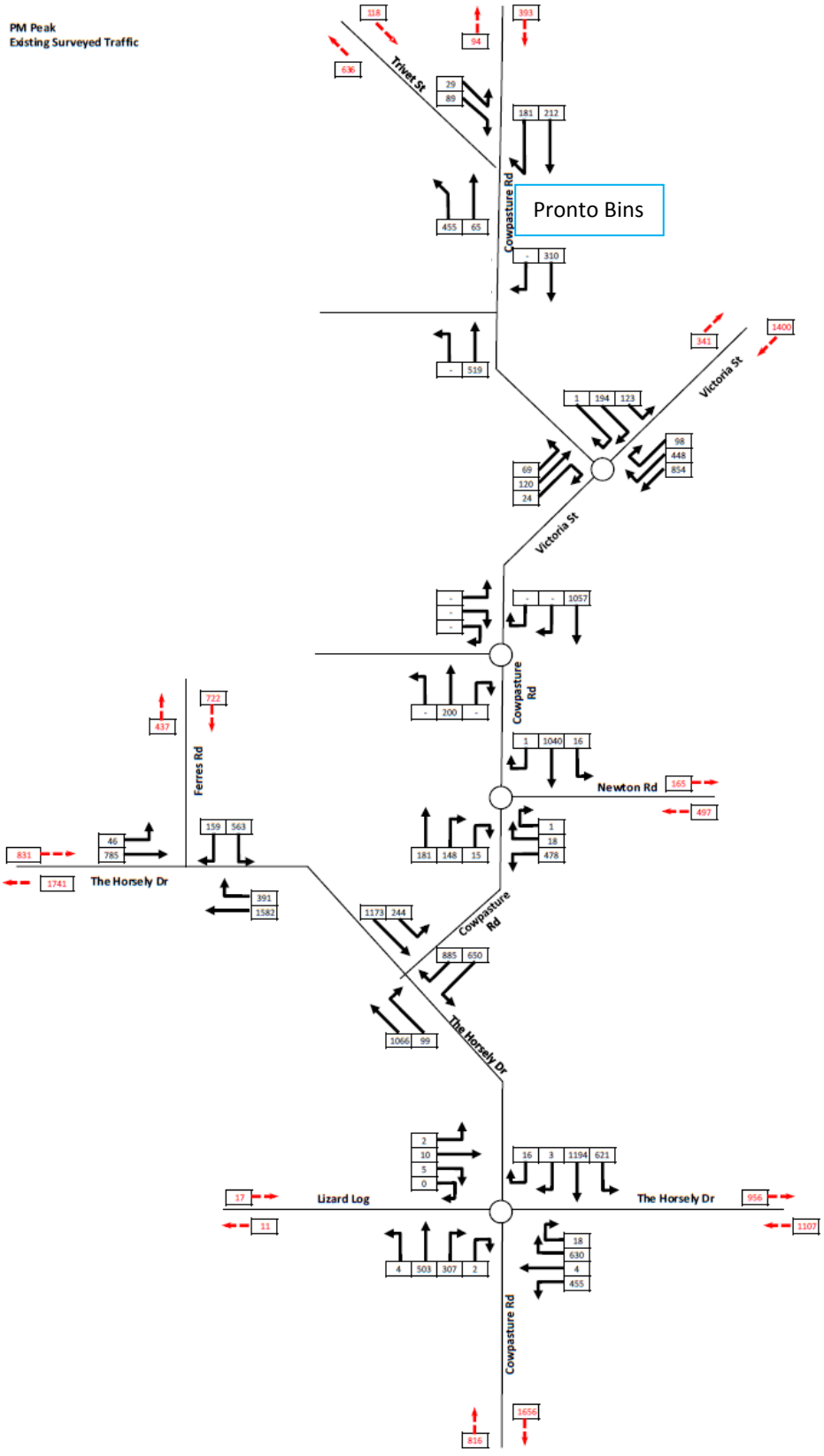
Peak traffic movements are shown on Figure 22 and Figure 23, below.

Figure 22: AM peak traffic movements at significant intersections



Source: Ason Group 2016

Figure 23: PM peak traffic movements at significant intersection



Source: Ason Group 2016

8.7.2.3 Performance at key intersections

The present performance of key intersections was analysed by Ason Group for the Horsley Drive Business Park Stage 2 EIS. The AVD (or average delay per vehicle in seconds) for intersections also provides a measure of the operational performance of an intersection and is used to determine an intersection's Level of Service (LOS). The Average Vehicle Delay is given in seconds, with LOS criteria based on the following:

Table 23: LOS criteria for intersections

Level of Service	Average Delay per Vehicle (secs/veh)	Traffic Signals, Roundabout	Give Way and Stop Signs
A	Less than 14	Good operation	Good operation
B	15 to 28	Good with acceptable delays & space capacity	Acceptable delays & spare capacity
C	29 to 42	Satisfactory	Satisfactory, but accident study required
D	43 to 56	Operating near capacity	Near capacity & accident study required
E	57 to 70	At capacity; at signals, incidents will cause excessive delays	At capacity, requires other control mode
		Roundabouts require other control mode	
F	More than 70	Unsatisfactory and requires additional capacity.	Unsatisfactory and requires other control mode or major treatment.

Source: Ason Group 2016

The results of intersection modelling for the existing scenario, based on 2016 surveyed traffic volumes is summarised in Table 24, and shows that all intersections are operating within capacity limits except for The Horsley drive/Cowpasture Road in the PM peak hour.

Table 24 Existing intersection operation summary

	Intersection	Period	Degree of Saturation (DOS)	Average Vehicle Delay (AVD)	Level of Service (LOS)
1	The Horsley Dr x. Cowpasture Rd Roundabout	AM	0.853	41.1	C
		PM	**1.424**	**457**	**F**
2	Cowpasture Rd x The Horsley Dr Signals	AM	0.849	28.6	C
		PM	0.867	34.3	C
3	Cowpasture Rd x Newton Rd Roundabout	AM	0.483	15.5	B
		PM	0.810	20.2	B
4	Cowpasture Rd x Victoria Street Roundabout	AM	0.858	22.0	B
		PM	0.616	14.2	A
5	Cowpasture Rd x Trivet Street Intersection	AM	0.857	22.4	B
		PM	0.308	14.8	B
6	The Horsley Dr x Ferrers Road Signals	AM	0.947	31.3	C
		PM	0.775	17.1	B

Source: Ason Group 2016

8.7.1 Potential Impacts

8.7.2 Traffic Demand

8.7.2.1 Installation and fit out

The fit out of the C&D waste processing equipment would occur over approximately 6 weeks. The fit out would require the delivery of pre-fabricated equipment during the initial two weeks. It is expected that on average one semi-trailer would arrive per working day to deliver the steel work and parts. This results in an average of two truck movements (one in and one out) at the facility per day.

The proposed supplier, RDT Engineering, confirmed that approximately eight staff members would install the plant and equipment. Staff generally travel together and therefore there would be an additional 3 vehicles utilising the site per day. The installation phase is expected to generate a maximum of 12 private

vehicle movements per day (six in and six out – accounting for arrival and departure of three cars plus a lunch run).

The daily road traffic generated during plant and equipment installation would therefore be two truck movements and twelve private vehicle movements. Considering the low number of vehicle movements per day it is unlikely that there would be any impact in traffic movements on Cowpasture Road or the surrounding road network due to the installation works.

8.7.2.2 Operation

Truck movements

During the operational phase, the majority of truck movements would be from skip bin trucks. Pronto Bins' trucks have a maximum length of 10m and a capacity of between 1 and 7 tonnes. Additionally, one 19m articulated vehicle would be used to remove larger quantities of waste materials approximately once a week. Truck movements are restricted to the hours of operation of the site, being between the hours of 6am and 6.00pm Monday to Friday and 6am to 4pm on Saturdays. The facility would not operate on Sundays or Public Holidays.

The EB Traffic Solutions' report calculates that, with a maximum throughput of 20,000 tpa, and an average fill weight of 4 tonnes, approximately 16 incoming and outgoing skip bin trucks movements would occur per day, which corresponds to one truck entering and leaving the site every 45 minutes. For a throughput of 10,000 tpa there would be approximately 1 truck entering and leaving every 90 minutes. The additional vehicle movements would not significantly affect either daily or peak traffic movements.

Traffic

For the AM and PM peaks a conservative approach was adopted, for the maximum capacity scenario. It was assumed that 80% of yard and office staff (14) would arrive in the AM peak and that 100% of truck drivers (10) would arrive and depart in the AM peak period. In the PM peak, it is assumed that 80% of truck staff would arrive and 80% of staff (including drivers) would leave. The AM and PM peaks for the Proposal are shown below in Table 25.

Table 25: Peak AM and PM additional vehicle movements

Vehicle movements	Inbound	Outbound	Total
AM peak	21	10	31
PM peak	8	19	27

At The Horsley Drive and Cowpasture Road roundabout the level of service (Table 24) is deemed unsatisfactory. This is presently being addressed by the current NSW government proposal to upgrade The Horsley Drive and improve the east-west connection from the Western Sydney Employment Area (WSEA) and the M7 Motorway to the Smithfield/Wetherill Park Industrial Area.

The proposed upgrade would include:

- A four lane divided road between the M7 Motorway and Cowpasture Road with a wide central median to allow for six lanes in the future;
- An extra eastbound lane west of Ferrers Road to Cowpasture Road;
- A pedestrian and cyclist shared path along The Horsley Drive, connecting to the Western Sydney Parklands cycleway;
- Upgrade of the Ferrers Road intersection and Cowpasture Road north intersection;

- Upgrading the roundabout at The Horsley Drive and Cowpasture Road to an intersection with traffic lights to improve traffic flow.

The upgrade would address issues of performance at the Horsley Drive and Cowpasture Road, resulting in the performance levels which are satisfactory, as shown in Table 26.

Table 26: Intersection performance at The Horsley Drive/Cowpasture Road with proposed upgrade:

Intersection	Peak	2021 Average delay per vehicle (seconds)	2021 Level of service	2031 Average delay per vehicle (seconds)	2031 Level of service
The Horsley Drive/Cowpasture Road (south)	AM	39	C	53	D
	PM	40	C	40	C

Source: RMS The Horsley Drive Upgrade – Environmental Investigation Report 2017

Considering the intersection performance at all The Horsley Drive/Cowpasture Road (south) following the RMS upgrade and low additional AM and PM peak traffic movements as a result of the Proposal, intersection performance at all key intersections would operate at an acceptable level.

8.7.3 Existing and Required Parking

The existing car parking allows for 44 car parking spaces shared between Pronto Bins and two facilities, as shown on the Site Plan in Appendix A.

Once the site is fully operational, staff at the Pronto Bins' facility would comprise a maximum of ten truck drivers, five yard staff and nine office and administration staff, being a total of 24 staff members. It is understood that each adjacent facility onsite operates with one staff member, bringing the total required staff parking to 26. An additional four spaces for visitor parking would be provided. The existing car park has 44 spaces, which more than adequately meets the need for 30 spaces and provides an excess of 14 spaces.

Trucks drivers would arrive early, at 6am, and leave soon after to begin delivering skip bins. Pronto Bins' fourteen administration and operations staff would arrive and leave at normal office hours, creating a staggered demand for traffic movements onsite.

The traffic report recommends that the car park is upgraded to install an accessible space at dimensions of 2.4m wide and 5,4 m long, with a bollard provided within the shared space at an offset distance of 800mm from the edge of the accessway in accordance with Australian Standard AS 2890.6 (2009). The car park has adequate room for the provision of a disabled bay and adjacent shared space. The plans in Appendix A have details including accessible spaces proposed.

8.7.4 Alternative Transport Modes

The site is well serviced by public transport, with the 814 bus route running along Cowpasture Road. Buses operate at times which coincide with the majority of operating hours, although the facility is not expected to create a large demand for public transport use.

The site can accommodate bicycle transport with adequate room to safely store a bicycle either outside the building, within the shed or in the office. The facility would also not have a high demand for bicycle storage.

8.7.5 Loading Bay Requirements

The existing loading bay facilities are located within the shed and have dimensions of 26.5m wide 30.6m long with a headroom clearance of 8.195m. These dimensions comply with the requirements of the Fairfield Council DCP which requires a width of 7m, length of 17.5m and a headroom clearance of 3.6m.

The dimensions and headroom clearance would be able to accommodate the maximum clearance of a 19m long truck.

8.7.6 Site Accessibility

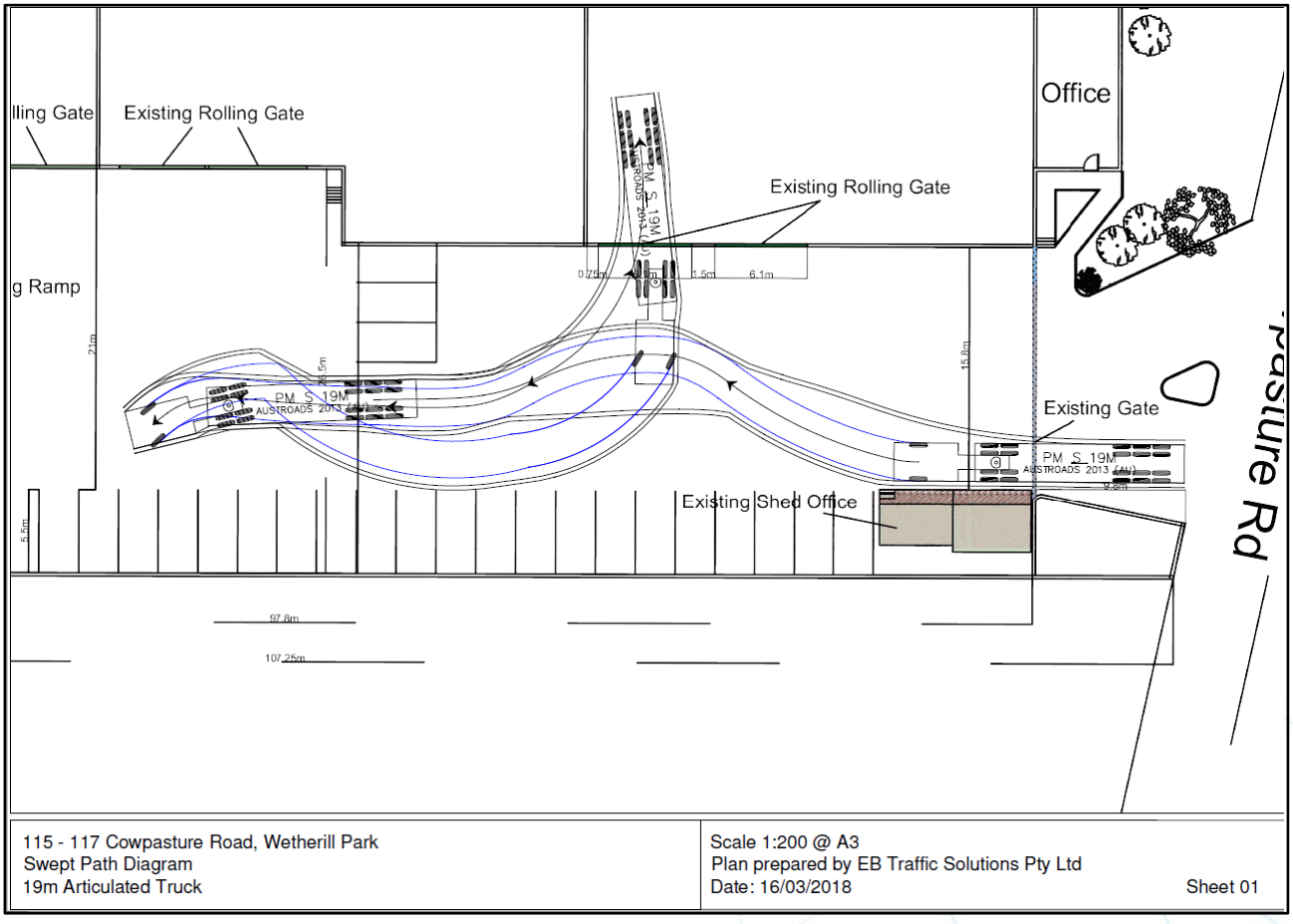
A swept path analysis was undertaken by EB Traffic Solutions as part of the Traffic Impact Assessment to determine if all vehicles are able to enter and exit the premises in a forward-facing direction.

The swept path analysis indicates that any vehicle up to 19 metres in length is able to enter and leave the facility in a forward-facing direction, as shown in Figure 24, below.

As demonstrated in this section and the Traffic Impact Assessment Report, the need for car parking, loading bay requirements, accessibility of the site via alternative transport, the ability to enter and leave the site in a forward direction and the impact on the local road network are all within safe and reasonable parameters as outlined in the Penrith Council Citywide DCP.

No upgrades to the local traffic road network would be required as a result of the development.

Figure 24: Swept Path Analysis



Source: EB Traffic Solutions, 2018.

8.7.7 Safeguards and Management Measures

- A disabled bay and adjacent shared space would be provided in accordance with Australian Standard AS 2890.6 (2009);
- Staff would be trained in workplace traffic management procedures; and
- Traffic safety and management measures would be incorporated into the site EMP.

This Section has assessed the potential impacts on traffic and access. The residual risks for traffic and access are considered to be low.

8.8 Visual Amenity

8.8.1 Existing Environment

The proposed facility is located in an industrial area with similar development occurring in the vicinity. There are no visually significant sites or scenic locations nearby which may be affected by the development.

External lights are located at four positions on the top of the industrial buildings. All lights are directed downward and are within the driveway section of the site, away from the street.

8.8.2 Potential Impacts

The proposed processing line will be assembled inside the existing industrial shed, therefore, there will be no change in the external appearance of the site. Pronto Bins would maintain and clean the site to ensure that it is kept neat and tidy.

The installed demountable buildings are of small scale in comparison to the surrounding development, at 4.8 by 2.4 metres with a maximum height of 3.55 metres. The setback is 20-30 metres from the road, along the fence-line of the adjoining property. The buildings are constructed of cream coloured colorbond materials with dark green trim, in keeping with building construction in the surrounding area. The scale and appearance of the demountable buildings would therefore not impact on the visual amenity of the neighbourhood.

The location of lighting on the driveway of the premises and the industrial nature of the surrounding area would result in no impacts to local traffic or residents.

No large signage is required for the development. The allowable signage under the Fairfield City Council Development Control Plan is less than 0.5m^2 per metre of street frontage. This equates to 63m x 0.5 m^2/m= 31.5m^2. Proposed signage would be 1.5m x 3m, which equates to 4.5m^2 and therefore complies with the DCP.

8.8.3 Safeguards and Management Measures

While no potential visual amenity impacts are expected, the following management measures would be implemented in line with the conditions of the existing development consent:

- Signs will comply with the requirements in the Fairfield City Council DCP;
- The site would be kept tidy; and
- External lighting associated with the development will not create nuisance to surrounding receivers and/or roadways and will comply with the Fairfield DCP.

The development would have no additional impact on visual amenity at the site.

8.9 Socio-economic Effects

8.9.1 Existing Environment

It is important to understand the social context of the development, to ensure that its planning takes account of and is responsive to the surrounding social conditions and that it will integrate, both physically and socially, with the surrounding area.

The estimated resident population of Fairfield City Council was 198,817 according to the 2016 Census. In 2016, 4580,326 people in the Council area reported being in the work force, of which 56% work full time 28% work part time and 10.5% were unemployed. The most common occupations are technicians and trades workers at 15.0% and labourers at 14.8%. Both specialties are well represented in the waste industry sector to which Pronto Bins belongs.

8.9.2 Potential Impacts

The successful establishment and expansion of Pronto Bins' activities will have a positive effect on the socio-economic environment of the Fairfield area through the full-time employment of 14 operational and administrative staff members at the facility and 10 drivers, including 3 additional staff. Approval of the Proposal would support the Pronto Bins business and ensure its viability over time.

Installation of processing equipment would result in positive economic and social benefits through employment opportunities.

Indirectly, the operation would also provide continued local employment for support services, such as fuel and equipment suppliers, specialist contractors, maintenance personnel, business services and retail trades.

Other socio-economic benefits derived from the recycling activities overlap with the need for the Proposal and are an advantage to society as a whole:

- Recovery of valuable resources and supply of material for the greater productive economy; and
- Assistance with achievement of State landfill diversion targets for C&D.

As described in Sections 8.1, 8.2, and 8.7, the effects of dust, noise and traffic will be minimal and are not likely to have any impact on the surrounding population. The proposed recycling activities serve to benefit the local community, firstly through resource recovery and secondly through continued employment.

8.9.3 Safeguards and Management Measures

No specific safeguards and management measures are proposed.

Positive social impacts arise from the Proposal through employment and environmental benefits to the community.

8.10 Ecology

8.10.1 Existing Environment

The development site has an area of approximately 2,300m^2 and stands in an industrial precinct in Western Sydney. The whole area has been cleared of native vegetation for many years, and the development site is fully covered by hardstand concrete. The only vegetation present are garden plantings and a few trees that have been established more recently in order to improve the visual amenity of the site.

8.10.2 Potential Impacts

No vegetation would be removed for the proposed change of use and there would be no impacts on the habitat of native fauna.

8.10.3 Safeguards and Management Measures

No specific safeguards and management measures are proposed.

Due to lack of vegetation and fauna habitat at the site, no ecological impacts are anticipated as a result of the Proposal.

8.11 Indigenous Heritage

8.11.1 Background

Consideration of the potential impacts of development on Indigenous Aboriginal heritage is a key part of the environmental impact assessment process. Section 8 of the Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales (2010), states that if an activity will not disturb the ground surface or any culturally modified trees then the activity can proceed with caution without applying for an Aboriginal Heritage Impact Permit (AHIP). The Proposal would not require disturbance to the ground or culturally modified trees and therefore a search of the Aboriginal Heritage Information Management System (AHIMS) database is not necessary in this case.

8.11.2 Potential Impacts

Considering that the ground surface has been previously modified and there would be no excavation required for the proposed development, there is no potential for impact on items of indigenous heritage significance.

8.11.3 Safeguards and Management Measures

No specific safeguards and management measures are proposed.

Due to the absence of ground surface disturbance by the development, no Indigenous Heritage impacts are anticipated.

8.12 Non-Indigenous Heritage

8.12.1 Existing Environment

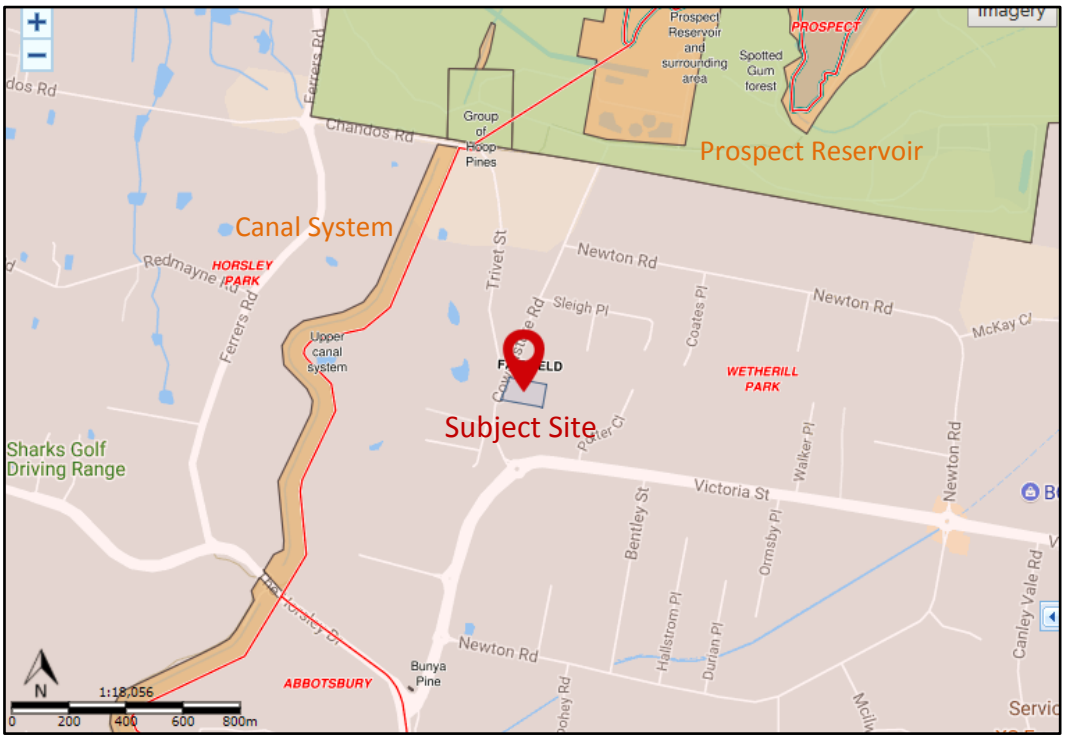
Non-indigenous heritage includes those places or items that are protected by a Local, State or National heritage listing. Searches were undertaken of relevant databases to determine the potential for impact to local heritage.

The Upper Canal System and the Prospect Reservoir are mapped as heritage areas in the Fairfield City Council LEP 2013. The Canal is approximately 460m from the site and the heritage area at the reservoir is approximately 700m away. Neither of these areas would be affected by the development.

A search was undertaken of the NSW State Heritage Register. The closest State-listed heritage item is the Prospect Reservoir and surrounds.

A search was undertaken for items of National Heritage Significance using the Australian National Heritage List. No items of national heritage significance are found in the vicinity.

Figure 25: Map of Heritage Significance



Source: NSW Planning and Environment Heritage Viewer

8.12.2 Potential Impacts

None of the sites identified in the Local, State or National heritage databases are close enough to the site to be affected by the Proposal.

8.12.3 Safeguards and Management Measures

No specific safeguards and management measures are proposed.

Due to the distance from all heritage sites, no impact on non-indigenous heritage values is anticipated.

8.13 Principles of Ecologically Sustainable Development

The principles of ecologically sustainable development as applied to Pronto Bin's proposed operations are summarised in Table 27, below.

Table 27: Principles of Ecologically Sustainable Development

Principle	Definition in the EP&A Regulation	Comment
Precautionary Principle	*If there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation.*	The risk assessment in Section 9 indicates that the residual risk of the activity, after mitigation measures have been employed is minimal. There would be no threat of serious or irreversible environmental damage.
Inter-generational equity	*The present generation should ensure that the health, diversity and productivity of the environment are maintained or enhanced*	The Proposal would not consume water or energy resources in quantities that

Principle	Definition in the EP&A Regulation	Comment
	for the benefit of future generations.	affect the benefit of future generations. The environmental assessment in Section 8 indicates that the health, diversity and productivity of the environment would be maintained and enhanced by resource recovery operations. Resource recovery and disposal are the two options available for received materials. Recovery of materials, as proposed, provides greater inter-generational equity by contributing to the circular economy and increasing availability of resources.
Conservation of biological diversity and ecological integrity	*Conservation of biological diversity and ecological integrity should be a fundamental consideration*	The environmental assessment in Section 8 indicates that there would be no impacts to biological diversity and ecological integrity as the site is already established.
Improved valuation, pricing and incentive mechanisms	*Environmental factors should be included in the valuation of assets and services, such as:* *(i) polluter pays, that is, those who generate pollution and waste should bear the cost of containment, avoidance or abatement,* *(ii) the users of goods and services should pay prices based on the full life cycle of costs of providing goods and services, including the use of natural resources and assets and the ultimate disposal of any waste,* *(iii) environmental goals, having been established, should be pursued in the most cost effective way, by establishing incentive structures, including market mechanisms, that enable those best placed to maximise benefits or minimise costs to develop their own solutions and responses to environmental problems.*	Pricing mechanisms including licensing and penalties for polluting under the waste regulatory system will apply to the Proposal and will impose the 'polluter pays' principle. Market mechanisms, such as the NSW levy on waste disposal and the *WLRM* grants encourage the diversion of waste from landfill and increased resource recovery. The proposed operations will utilise these mechanisms to maximise environmental benefits and minimise costs.

8.13.1 Cumulative Impacts

Cumulative impacts occur when impacts (e.g. dust or odour emissions) from multiple sources cause stress to the environment such that there is a significant overall impact, affecting the availability of resources or causing environmental harm or nuisance. The proposed development does not require additional infrastructure such as roads, water or sewerage upgrades.

Table 28 identifies the cumulative impact of the environmental aspects of the development. Due to the small scale of the development, overall impacts are minor and unlikely to cause environmental harm.

Table 28: Cumulative impacts

Environmental aspect	Potential impact	Cumulative effect
Air quality - particulates	A minor increase in $PM_{2.5}$ PM_{10} and TSP will result from the proposal.	Minor negative impact
Odour	Odorous emissions are not expected to result from the proposal.	Nil
Noise	The operation of plant and equipment will not result in exceedance of noise criteria.	Minor negative impact
Water quality	The proposal would not affect the water use of any other receiver. The installation of Enviropod filters has the potential to improve water quality in accordance with Fairfield City Council and ANZECC recommended limits.	Negligible/ long term net benefit
Traffic	The addition of approximately 32 truck movements will minimally increase traffic on local roads.	Negligible
Visual amenity	No change to the visual appearance of the site is likely.	Nil
Socio-economic	The employment of 24 staff members creates economic opportunity locally.	Medium term net benefit
Waste management	Recovery of materials results in overall job creation (compared to landfilling the same quantity of material), conservation of resources, reduction in landfilling and supply of materials.	Long term net benefit
Hazards and risks	Management of hazards and risks will reduce adverse.	Potential negative impact
Ecology	No vegetated areas or fauna would be affected by the proposal.	Nil
Indigenous heritage	No disturbance to indigenous heritage would occur.	Nil
Non-indigenous heritage	No disturbance to non-indigenous heritage would occur.	Nil

9. Environmental Risk

The residual risk assessment reassesses the potential for harm after the application of the mitigation measures outlined in Section . Preliminary risk is taken from the Preliminary Risk Assessment in Section 7.

9.1 Residual Environmental Risk Assessment

Table 29: Residual environmental risks

Issue	Potential Impacts	Preliminary Risk Ranking	Management Measures Proposed	Residual risk
Soil and water	Disturbance of PASS causing environmental harm	Low	• No disturbance of ASS or potential ASS would occur.	Low
	Migration of soil and dust on the site resulting in sedimentation within stormwater and natural waterways	Moderate	• Stormwater runoff controls for external collection point; • Internal stockpiling and processing to reduce the migration of sediment and; • Installation of Enviropod filers.	Low
	Discharge of contaminated groundwater from the site	Low	• All practicable steps would be taken to ensure that unforeseen events, such as spills or leaks do not result in polluted water entering the stormwater system. The risk would be minimised by ensuring that: ○ Clean up equipment and spill kits specifically designed to deal with regular small spills are provided; ○ Spill management plan and/or an emergency response procedure are developed for large fuel spills; ○ All staff are trained in the emergency response procedure for large spills and all staff know where the written procedure is kept; ○ The fuel storage area is regularly inspected; ○ The fuel tank on site is bunded to comply with the	Low

Issue	Potential Impacts	Preliminary Risk Ranking	Management Measures Proposed	Residual risk
			requirements of AS1940:2004 *Storage and Handling of Flammable and Combustible Liquids*; and • Galvanised mesh plates have been installed on the detention pits to protect them from litter ingress.	
	Alterations to hydrology on site and stormwater discharge levels from site	Low	The Proposal would not result in an increase in impervious surfaces at the site and consequently there would be no increase in the stormwater runoff generated at the site. To assist in management of stormwater the following management measures would be implemented: • Regular cleaning of drains, pits and filtration systems and; and • Particular attention shall be paid to ensure the stormwater system is kept free from waste and debris from operations.	Low
Traffic and access	Increased traffic volumes and frequency, including heavy vehicles	Moderate	The low number of additional vehicles would not impact on the local road network.	Low
	On-site parking demands	Low	EB Traffic Solutions concluded that there are ample car parking spaces for the development.	Low
	Reduction in road safety as a result of increased numbers of heavy vehicles operating on the road networks around the site	Moderate	EB Traffic Solutions concluded that no mitigation measures are required to be implemented based on the traffic generation of the Proposal.	
Waste Management	Waste generation	Low	The installation of the new processing line would generate some packaging waste during installation which will be recycled where possible.	Low

Issue	Potential Impacts	Preliminary Risk Ranking	Management Measures Proposed	Residual risk
			Waste generated onsite during the operation of the facility (office waste, lunch food waste) will be minimal and will be collected by a waste contractor for recycling and disposal.	
	Disruption to operations	Moderate	An Operational Contingency Plan would be incorporated into the EMP and would identify external factors that may disrupt the operation of the facility and prescribe measures to mitigate potential impacts associated with disruption to operations.	Low
	Receipt of non-conforming waste at the site	Moderate	A visual inspection would occur prior to unloading waste materials. Non-conforming waste loads would be rejected. If non-conforming waste is identified during processing it would be separated and subsequently disposed of at a facility which is licensed to take that type of waste. .	Low
Noise and vibration	Noise impacts on sensitive receivers from site operations	Moderate	The site would not exceed any noise criteria for daytime or night-time hours. The following safeguards are proposed to mitigate noise impacts on site: • Installation work will be restricted to between 7am and 7pm Monday to Friday; • Operational hours to be restricted to 6am and 6.00pm Monday to Friday and 6am to 4pm on Saturdays; • All equipment use on the site will be selected and operated to minimise noise where feasible; • Mechanical processing would take place inside the industrial shed; • Training will be provided for operators regarding potential noise problems; and	Low

Issue	Potential Impacts	Preliminary Risk Ranking	Management Measures Proposed	Residual risk
			• Public address systems will not be used on site.	
Air quality	Odour generated from processing of C&D waste materials	Low	• As the proposed materials accepted by the site are limited to non-putrescible C&D waste, the potential for odour emissions arising from these materials would be low.	Low
	Air pollution including dust and exhaust emissions	Moderate	• A Dust Management Plan will be developed within the site EMP. • Dust suppression system will be employed.	Low
Biodiversity	Impact on local biodiversity as a result of site operations	Low	• The Proposal would have no impact on local flora or fauna.	Low
Indigenous heritage	Potential impact on the indigenous heritage of the area	Low	No items of Aboriginal Heritage significance have been recorded on site. There would be no ground disturbance as a result of this proposal. In the unlikely event of an unexpected find of historical heritage objects, archaeological relics or sites, OEH would be notified immediately.	Low
Non-indigenous heritage	Potential impact on the non-indigenous heritage of the area	Low	A search of the National Heritage Register found no items of national heritage significance in the vicinity. In the unlikely event of an unexpected find of historical heritage objects, archaeological relics or sites, OEH would be notified immediately.	Low
Socio-economic	Potential negative social impacts on the locality due to increased traffic, noise, and air pollution	Moderate	Based on the specialist consultant studies that were undertaken as part of the development of this EIS, there would be no significant impacts due to traffic, noise, or air pollution. No negative social impacts are anticipated to occur as a result of the Proposal.	Low
	Impact on local economy	Low (Net Benefit)	The proposed project will result in a net social benefit due to the following: • Generation of employment (administrative, operations and driver	Low

Issue	Potential Impacts	Preliminary Risk Ranking	Management Measures Proposed	Residual risk
			positions); • Recovery of valuable resources from C&D materials; and • Indirect employment opportunities created during the installation of equipment and the ongoing operations of the facility.	
Visual impact	Potential for decrease in visual amenity of the area	Low	Processing activities would be contained within the existing industrial building. Litter in the site would be collected daily. No large signs would be installed. There would be no intrusive lighting. Vegetation would be retained.	Low
Hazard and risks	Occurrence of hazards or risks on-site	High	Hazards and risks would be minimised through the implementation of an EMP. Containment of fuels and oils would be regularly inspected for leaks and deterioration. Implementation of standard fire management procedures would consider the storage of materials, evacuation and access to and disposal of firefighting equipment resulting in low residual risk.	Low

9.2 Plan of Management

9.2.1 Environmental Management Plan

As part of the Pronto Bins' Management System a set of operating procedures would be developed and implemented forming the Site's EMP. The EMP would comply with any relevant legislation and address all commitments and requirements of this EIS, as well as those made by concurrent reports by other agencies or the Fairfield City Council and conditions of approval or consent.

The EMP would include:

- Project description;
- Context, objectives and policy overview;
- Environmental management structure and responsibility;
- Approval and licensing requirements;
- Reporting;
- Environmental training;
- Emergency contacts and response;
- Risk assessment;
- Environmental management activities and controls;
- Environmental management plans and maps;
- Environmental schedules;
- Environmental monitoring and auditing;
- Corrective action; and
- EMP review.

Specific mitigation measures to address key environmental aspects would be captured within sections of the EMP. In addition, the EMP would provide for a number of monitoring and reporting regimes. Section 10 outlines the content of sections that would form part of the EMP.

10. Summary of Mitigation Measures

It is recommended that the controls from this EIS be included in a site EMP as follows (Table 30):

Table 30: Summary of mitigation measures

Environmental Factor	Mitigation Measures
Air quality Management	• All unloading and handling activities for processing and storage to be performed within the industrial shed; • During dry and windy weather condition, the facility should modify the method of working e.g. the door will be closed during operation of the facility to prevent spread of dust; • Engines of on-site vehicles and plant would be switched off when not in use; • Vehicles would be maintained in accordance with manufacturer specifications; • The amount of material stockpiled would be minimised; • A sweeper would be used in the sorting area to minimise dust build-up; • Sealed haul roads would be maintained using a sweeper; • A site speed limit would be imposed; • Vehicle loads would be covered when transporting offsite; • A dust suppression system would be installed to be used during sorting operations; • Doors would be closed to sorting floor during activities which would generate high levels of dust and; • Loads containing putrescible materials would be rejected at the primary inspection stage.
Noise	• Installation work will be restricted to standard construction hours; • Operational hours to be restricted to between 6am and 6.00pm Monday to Friday and 6am to 4pm on Saturdays; • All equipment use on the site will be selected and operated to minimise noise where feasible; • Equipment would be maintained to minimise vibrational impacts; • All operations will take place inside the industrial shed; • Training will be provided for operators regarding potential noise problems; • Public address systems will not be used on site; and • Noise complaints would be recorded in a complaints register and reasonable measures would be taken to reduce impacts.
Water Quality Management	• Installation of Enviropod filters on all inlet pits, except pit 5; • Regular inspection and maintenance of drains, hardstand areas and grids; • Regular cleaning of drains, pits and filtration systems; • As detailed in Section 8.5, particular attention to be paid to ensure the stormwater system is kept free from waste and debris from operations; • Bunding of hazardous substances stored for use on site including diesel

	and hydraulic oil; • Regular inspections of hazardous substance containment, including valves, pumps, pipes and hoses; • A spill kit would be made available and staff would be trained in its use; • Standard operating procedures would be implemented in the event of an on-site or off-site emergency; and • Fire-fighting equipment will be available onsite.
Soil and Contamination	• No disturbance of soil is required for the development; and • Recovered and residual materials will be transported to a facility that is licensed to receive that type of waste and will not be illegally dumped.
Waste Management	• All waste including materials inputs and waste generated through the operation of the facility would be recycled where possible; • The unloading of vehicles and processing of waste will take place within the industrial shed where litter can be readily contained; • A daily clean-up of the site, both outside and inside will occur at the end of each work day. If conditions are particularly windy, more frequent clean-up will occur; • All drains on site are fitted with a grate which will be checked weekly for litter.
Fire and Hazards	• Management Measures have been outlined in Table 20 • Hazards and risks would be minimised through the implementation of an EMP; • A dust suppression system would be provided in the waste handling area; • Diesel would be stored in a self-bunded tank; • Hydraulic oils would be stored within a bund; • Containment of fuels and oils would be regularly inspected for leaks and deterioration; • Sufficient fire suppression equipment would be provided in the waste storage area; • A hose reel with foam attachment would be provided in the vicinity of the fuel storage area; • Fire equipment would be routinely serviced; • Evacuation routes would be maintained for occupants to evacuate the building; • Vehicles would be regularly maintained; • Staff would be trained in emergency response; • Additional measures would be outlined in a site-specific EMP.
Access & traffic	• A disabled parking bay and adjacent shared space would be provided in accordance with Australian Standard AS 2890.6 (2009); • Staff would be trained in workplace traffic management procedures; and • Traffic safety and management measures would be incorporated into the site EMP.
Visual amenity	• Signs will comply with Fairfield City Council DCP requirements; • The site would be kept tidy; and

	• External lighting associated with the development will not create nuisance to surrounding receivers and/or roadways and will comply with the Fairfield DCP.

11. Justification for the Proposal

Pronto Bins would facilitate an essential waste management service in the processing of inert C&D waste for the Sydney area, in line with the strategic need for the development described in Section 2.

This EIS has concluded that the site at 115-119 Cowpasture Rd is suitable for a C&D processing facility with regard to the scope of operations and its environmental impacts and relevant mitigation measures.

As indicated in this EIS, the development would have no adverse effects on the environment and all activities would be carried out in conformance with the safeguards and management measures outlined in Section 10.

The Proposal would achieve the following benefits:

- Diversion from landfill of valuable resources that will return to the greater productive economy;
- Improvement in NSW recovery rates of recyclable materials;
- Contribution to State waste diversion targets; and
- Local employment at the site due to economic viability of a C&D waste processing facility.

This EIS has considered the principles of ecologically sustainable development, including:

- the precautionary principle;
- the principle of inter-generational equity;
- the conservation of biological diversity and ecological integrity; and
- improved valuation, pricing and incentive mechanisms, namely, that environmental factors should be included in the valuation of assets and services.

The development activities are subject to assessment under Part 4 of the EP&A Act. This EIS has examined and taken into account all matters affecting or likely to affect the environment.

The development as described in this EIS best meets the planning objectives of the Fairfield Local Environmental Plan 2013 and the Fairfield Citywide Development Control Plan 2013.

The development would not result in significant impacts on the surrounding environment in terms of:

- Air Quality and Odour;
- Noise and Vibration;
- Water;
- Soils and Contamination;
- Waste;
- Fire and Hazards;
- Traffic and Transport;
- Visual Amenity;
- Ecology;
- Heritage; and
- Ecologically sustainable development.

It is expected that socio-economic factors would be impacted positively.

On balance, the development is considered justified in terms of its environmental impacts and strategic and operational needs.

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