

Detailed information about proposal and DA submission material

1 Overview

- 1.1 The proposal seeks to increase the processing capacity of an approved waste processing facility at 1A Raffles Glade, Eastern Creek, with ancillary changes, as follows:
- processing capacity is proposed to be increased from 30,000 to 40,000 tonnes per year of clean waste consisting of plastic, aluminium, liquid paperboard, steel and glass beverage containers. No site disturbance is required, such as demolition or construction activities
 - operating hours approved under DA-18-01927 are sought to be maintained, being 24 hours, 7 days a week
 - the nature of waste types to be processed will not change and will remain as existing.
- 1.2 Existing business operations will be maintained under this DA. The business operates 3 shifts, as set out below, with 16 staff per shift:
- 8.00 am to 4.00 pm
4.00 pm to 12.00 pm
12.00 pm to 8.00 am.
- 1.3 There will be no change to staffing under this DA. The business currently operates with a maximum 40 office staff and 20 operational staff. Given the staff rosters, typically no more than 32 staff would be on site at any given time.
- 1.4 The site currently operates with 1,120 commercial vehicles attending the site per week. On average this involves 160 commercial vehicles per day. See section 4 below for proposed changes.
- 1.5 The proposal will require an Environment Protection Licence from the EPA due to the increased processing capacity. The EPA has reviewed the information provided with the proposal and has determined that an increase in processing throughput to 40,000 tonnes received in a 12 month period can be appropriately managed by the proponent to prevent or minimise environmental impacts, subject to its General Terms of Approval.

2 The operation of the facility

- 2.1 The facility is operated by Cleanaway. The activities of this operation will continue to include the processing of clean waste consisting of plastic, aluminium, liquid paperboard, steel and glass beverage containers. The increased capacity is proposed without any modifications to the building or the need to provide any additional plant and equipment.
- 2.2 Cleanaway receives materials into the facility by truck. Trucks include small Pantech, rear-loading waste trucks and/or bulk-tipping/walking-floor vehicles dedicated to the Return and Earn scheme. These trucks do not carry any form of general or putrescible waste.
- 2.3 The trucks enter the facility filled with used beverage containers from various automated and manual Return and Earn collection points across NSW. The trucks empty the collected waste onto allocated unloading area(s) within the warehouse.
- 2.4 The used beverage containers are lifted from the allocated unloading area(s) within the warehouse via a front-end loader and are fed into a simple sorting line where the waste is separated by automation (magnets, camera, readers and air current) and manually (by

hand) into waste material types accepted by Return and Earn (e.g. aluminium, steel, plastic).

- 2.5 Once sorted, the beverage containers will be placed into a baling machine which will compact and tie the baled beverage containers. Storage of these bales consumes approximately 200 to 300 m² of warehouse space, while sufficient inventory is built to enable loading into shipping containers by material type. Shipping containers are transported to recycling facilities both domestic and international.
- 2.6 All liquid generated from this facility is collected and removed from the site in intermediate bulk containers to be disposed as non-dangerous goods waste at a Cleanaway liquid treatment facility.

3 Management of the facility

- 3.1 As the proposal is Designated development, the application is accompanied by an Environmental Impact Statement (EIS) prepared by Willow Tree Planning dated July 2020.
- 3.2 Willow Tree Planning states that the likely impacts associated with the proposed operations are considered to be consistent with the approved land use and existing operations. As demonstrated by the various studies and justification provided within the EIS, it is evident that the proposed increase in capacity will not result in any significant environmental impacts on the surrounding land or land uses. In particular, traffic, air quality, noise and vibration have all been identified as having no significant impact on surrounding development or the environment.

4 Access, traffic and parking matters

- 4.1 A Transport Impact Statement, prepared by Ason Group dated 20 December 2019 was submitted with the application.
- 4.2 The site has a separate light vehicular access to/from Raffles Glade on its southern corner, which provides connection to the primary off-street carpark.
- 4.3 Heavy vehicles can access the site via either a:
 - 13.6 m wide eastern driveway or
 - 12.3 m wide western driveway.
- 4.4 These 2 commercial vehicular accesses are designed to accommodate vehicles up to the size of 19 m articulated vehicles.
- 4.5 The site currently includes the provision of 61 car parking spaces that comprise: 41 standard spaces, 10 visitor parking spaces, 8 small car spaces and 2 accessible spaces. Parking requirements have already been assessed and approved under DA-11-886 and CDC-18-00012.
- 4.6 The site currently operates with 1,120 commercial vehicles attending the site per week. on average. The site accommodates approximately 160 commercial vehicles per day with an average hourly trip generation of 7 commercial vehicles across the day. Therefore, a peak of up to 14 commercial vehicle movements per hour (7 in, 7 out) typically occurs. This includes a combination of small and heavy rigid vehicles and articulated trucks.
- 4.7 The proposed operations are anticipated to result in a traffic generation increase of 40 commercial vehicles per day, but no increase in staff vehicles. The proposal will result in an increase of only 4 heavy vehicle trips per hour and so will create a minor increase in traffic on the adjacent and surrounding road network.
- 4.8 Pedestrian access is provided by footpaths along Raffles Glade fronting the site. It allows convenient pedestrian access to the site and Eucalyptus Place, which further connects the walking patrons to the Honeycomb Drive pedestrian network.

- 4.9 Current operations involve 16 staff per shift, with 3 shifts per day. Daily staff movements are 96, assuming 1 vehicle trip per staff member. During shift changeovers it is expected that up to 32 staff movements might be generated.

5 Stormwater management

- 5.1 Stormwater advice prepared by Henry & Hymas Consulting Engineers dated 12 February 2020 was submitted with the application, to report on whether the increase in capacity will have an impact on stormwater runoff, flooding, sediment and erosion controls and/or groundwater.
- 5.2 In its letter, Henry & Hymas Consulting confirmed that there will be no changes to stormwater, flooding or groundwater as a result of the proposed increase in the capacity of the facility. The letter states that the proposal is contained wholly within the existing building footprint.

6 Dust, air quality and odour matters

- 6.1 An Air Quality Assessment report prepared by SLR Consulting Australia Pty Ltd dated 6 May 2020 was submitted with the application.
- 6.2 In its report SLR Consulting indicates that the main potential sources of air emissions were identified as:
- odours and particulates from the handling and storage of waste
 - by-products of combustion from vehicular traffic.
- 6.3 The waste stored at the facility is classified as non-putrescible, however beverage residues left in containers returned for recycling, and yet to be sorted, do break down, emitting odours in the process. Based on the air quality assessment, the winds blow in the direction of the existing and future sensitive receptors only 5% of the time during the year. This reduces the likelihood of residential receptors experiencing potential odour and dust impacts. However, as the waste that is yet to be sorted is stored inside the facility, the assessment also states that odour could not be detected outside of the warehouse building and no visible dust emissions were observed emanating from the site.
- 6.4 SLR Consulting concluded that emissions generated due to combustion of fuel in heavy vehicles associated with the facility will be small compared to the emissions generated by traffic on the surrounding road network.
- 6.5 Based on the qualitative assessment of the potential for off-site air quality impacts, SLR Consulting concluded that, given the nature of the operations proposed and the location of the site and local meteorological conditions, it is highly unlikely that any exceedances of the relevant air quality criteria will occur at the nearest sensitive receptor locations as a result of the operation of the project.

7 Noise matters

- 7.1 A Noise Impact Assessment prepared by Rodney Stevens Acoustics Pty Ltd dated 6 January 2020 was submitted with the application.
- 7.2 Rodney Stevens Acoustics assessed the impacts from truck deliveries and operational and mechanical plant noise emissions. Its report stated that the increase in trucks from approximately 60 - 80 trucks per day up to 80 - 100 trucks per day will equate to approximately 4 trucks per hour. As the volume of trucks increases during morning and afternoon peak periods, the report assumes that a maximum of 8 trucks per hour during peak periods will occur. This equates to 2 trucks per 15 minutes. The predicted noise impact to surrounding sensitive receivers is shown below:

Receiver	Period	Calculated Noise Level LAeq - dB (A)	Criteria
C1	when in use	30	65
C2	when in use	57	65
C3	when in use	49	65
C4	when in use	42	65
R1	Night time	24	45
	(strictest criteria)		

C1, C2, C3 and C4 are the noise receiver points located immediately adjoining the site, being commercial/industrial developments.

R1 is the closest residential receiver, located on the opposite side of the M4 motorway in the Minchinbury residential area.

- 7.3 The mechanical plant used on site is not proposed to change. As the facility already operates 24 hours a day, there will be no change in noise impact of the existing mechanical plant on surrounding sensitive receivers.
- 7.4 In its report, Rodney Stevens Acoustics states that the:
- predicted truck noise levels at sensitive receivers will comply
 - predicted operational noise measured outside of the warehouse will be compliant
 - proposed increase in capacity at the facility is predicted to comply with the noise criteria at the nearby sensitive receivers
 - the facility currently operates 24 hours a day and the surrounding environment is well suited to the operations that already occur at the facility. The 25% increase in capacity, from the current operation, will not have an adverse acoustic impact and there are no further noise control measures required for the operation of this site.
- 7.5 Rodney Stevens Acoustics concludes that, under the most conservative operating scenarios, operational noise emissions from the proposed increase in capacity can achieve the noise criteria in line with the EPA's requirements at neighbouring sensitive receivers.

8 Bushfire protection assessment

- 8.1 A bushfire protection assessment prepared by Eco Logical Australia dated 14 January 2020 has been submitted.
- 8.2 Eco Logical Australia states that the proposed development will not increase the bushfire risk to the adjoining sites or affect environmental objectives, with no vegetation removal or modification required as a result of the proposal.

9 Risk screening

- 9.1 A preliminary risk screening prepared by Riskcon Engineering dated 20 January 2020 was submitted with the application.
- 9.2 Riskcon reviewed all the quantities of dangerous goods at the site along with an analysis of the associated vehicle movements and compared these to the threshold quantities outlined in State Environmental Planning Policy No. 33 - Hazardous and Offensive Development.
- 9.3 Riskcon's report states that the results of the analysis indicate that the threshold quantities for dangerous goods to be stored and transported will not exceed the quantities outlined

in SEPP 33. The report concludes that the facility is not classified as potentially hazardous and it is not necessary to prepare a Preliminary Hazard Analysis.

- 9.4 The maximum quantity of LPG to be stored on the site is 216 kg, which is under the threshold of the 10,000 kg permitted by SEPP 33.