



Planning &
Environment

***Veolia Resource Recovery Facility
37 Grand Avenue, Camellia (SSD 4964)***



Secretary's Environmental Assessment Report
Environmental Planning and Assessment Act 1979

June 2016

Cover Photograph: Rendering of the proposal

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EXECUTIVE SUMMARY

Veolia Environmental Services (the Applicant) has lodged a development application (DA) and accompanying environmental impact statement (EIS) seeking consent to construct and operate a resource recovery facility at 37 Grand Avenue, Camelia. The new facility would receive up to 200,000 tonnes per annum (tpa) of pre-sorted recyclable waste materials including mixed paper, cardboard, wood, hard plastics and metals for resource recovery. This material would be sourced mainly from Veolia's existing Port Botany and Greenacre transfer stations and directly from other commercial waste contractors.

The proposal includes demolition of a number of existing structures on the site and construction of a new building to enclose a waste tipping floor and mechanical processing equipment. The facility would provide up to 60 jobs during construction and 40 during operation, and has an estimated capital investment value of \$25 million.

The proposal is classified as State significant development (SSD) under Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) as it satisfies Clause 23(3) of Schedule 1 in the *State Environmental Planning Policy (State and Regional Development) 2011* because it involves development of a resource recovery facility that handles more than 100,000 tpa of waste. Consequently, the Minister for Planning is the consent authority for the proposed development.

The site is owned by Veolia and until 2009, had been used as a liquid waste treatment plant and as a depot for waste collection vehicles. Currently, Veolia still use the site for overnight storage of its liquid tankers (trucks) when required.

The site is located adjacent to the Parramatta River on the Camellia Peninsula. The Peninsula is identified as a Priority Revitalisation Precinct in the NSW Government's *A Plan for Growing Sydney*. In July 2015, the Department released a strategy on planning options for the Camellia Peninsula in consultation with Parramatta City Council (Council).

The Peninsula has a long history of land and groundwater contamination. Hexavalent chromium is wide spread as chrome ore processing residue was historically used as fill material. Asbestos contamination also occurs widely and is present on the site. It is especially prevalent on the river bank where waste from an asbestos manufacturing plant was historically deposited.

The site has been capped with asphalt to contain the contamination and there is a chain-link fence preventing access to the contaminated grassed area along the northern boundary. In 2010, Veolia re-lined the stormwater drains to prevent stormwater transporting contamination from the contaminated groundwater plume. It carried out this work under a Voluntary Remediation Agreement with the Environment Protection Authority (EPA). The cap and contamination at the site are currently managed through a Site Specific Environmental Management Plan.

Much of the Camellia Peninsula is also subject to flooding from the Parramatta River and from shorter term overland run-off exceeding the capacity of local stormwater infrastructure. While the site is above the flood levels when the river floods, it is difficult for the site to fully contain overland run-off as contaminated soils cannot be excavated and new stormwater channels installed to capture runoff. The proposed development would result in minor increases in existing overland flooding from run-off on Grand Avenue and neighbouring land. The Department discussed this issue at length with Veolia and Council. It is considered that while the development may result in a slight increase in flood levels, the future re-

development of the Camellia precinct will provide for improvements to road and drainage infrastructure in the area, and as such the impacts would be temporary.

The Department exhibited the DA and EIS for the development from Thursday 7 March 2013 until Friday 12 April 2013. Five submissions were received during the exhibition period, four submissions from public authorities and one submission from the general public. Two objected to the proposal.

Key concerns raised in submissions related to traffic impacts on James Ruse Drive and Grand Avenue, dust, odour and noise impacts on sensitive receivers as well as long standing issues in relation to contamination and flooding. Veolia submitted a response to submissions (RTS) in December 2013, and supplementary reports regarding flooding impacts in September 2015 and January 2016.

The Department's assessment has considered all relevant matters under Section 79C of the EP&A Act, the objects of the EP&A Act and the principals of ecologically sustainable development. The Department identified the following key issues for the assessment:

- flooding;
- traffic and access;
- air quality; and
- noise.

The Department's assessment concluded that there would be minimal impacts from dust, odour and noise on sensitive receivers and traffic generated by the facility can be satisfactorily accommodated on local roads. The predicted overland run-off impacts resulting from the development would be minor and temporary. The revitalisation precinct planning will include improved road access and public drainage works.

The proposal is consistent with the NSW Government's direction in achieving the targets of NSW 2021 and the Waste Avoidance and Resource Recovery Strategy would contribute significantly to the State's recovery performance in the commercial and industrial waste sector.

The Department has recommended a number of conditions including measures to manage noise, air and odour impacts, traffic and access, soil and water management and flood mitigation. The Department has also recommended conditions for on-going environmental management, including annual reporting and independent audits.

Consequently, the Department considers the proposal meets all relevant environmental and amenity criteria and that the development is in the public interest and should be approved, subject to conditions.

1. BACKGROUND

1.1 Overview

Veolia Environmental Services (Veolia) is a subsidiary of Veolia Environment, a French company specialising in waste and water infrastructure worldwide. In Sydney, Veolia operates waste collection and transfer facilities for household and commercial waste at Clyde, Port Botany and Greenacre.

The Clyde Transfer Station, which operates under the *Clyde Waste Transfer Terminal (Special Provisions) Act 2003*, collects waste for transfer by rail to Veolia’s landfill at Woodlawn, near Goulburn [approved by the Planning Assessment Commission (Commission) on 16 March 2012]. In April 2015, Veolia obtained approval from the Commission to construct another waste transfer facility at Banksmeadow. This facility will also collect waste for transfer by rail to the Woodlawn landfill and is currently under construction.

To complement its existing range of waste facilities, Veolia now seeks consent to construct and operate a resource recovery facility at 37 Grand Avenue, Camellia. The new facility would receive up to 200,000 tpa of comingled recyclables including mixed paper, cardboard, wood, hard plastics and metals for further processing and resource recovery. The materials would be sourced from commercial and industrial sources and also from Veolia’s Port Botany and Greenacre waste transfer stations (see **Figure 1**).



Figure 1 – City-wide location of Veolia’s waste facilities

1.2 Site description

The site is legally described as Lot 1 in DP 539890. It is located on the Camellia Peninsula about 3.7 kilometres (km) east of the Parramatta Central Business District. The lot is 85 metres (m) wide, 238 m deep and is 2.23 hectares (ha) in area. The development area is smaller as it excludes a 15 m strip of foreshore land adjacent to the Parramatta River (see **Figure 2**). The site is zoned IN3 Heavy Industrial under the *Parramatta Local Environmental Plan 2011*.



Figure 2: Subject site

1.3 Land use history and contamination

Until August 2009, Veolia operated a liquid waste treatment plant on the site and used the site as a depot for its waste collection vehicles. While the plant, tanker wash bay and workshop remain, the site is only occasionally used for parking liquid waste tankers overnight.

The site retains a number of development consents from Parramatta City Council for the storage and treatment of waste, including hazardous and dangerous waste. These consents would be relinquished to ensure the site operates exclusively under one Ministerial consent. Veolia also holds an Environment Protection Licence (EPL 4806) for waste storage and non-thermal waste processing on the site.

Hexavalent chromium is wide spread on the Camellia Peninsula. It exists on the site and in groundwater because chrome ore processing residue was historically used as fill material. Asbestos contamination also exists widely on the peninsula and is present on the site. It is especially prevalent on the river bank where waste from asbestos manufacturing in the area was historically deposited.

The site has been capped with asphalt to contain the contamination and there is a chain-link fence preventing access to the contaminated grassed area along the northern boundary. In 2010, Veolia re-lined the stormwater drains to prevent stormwater transporting

contamination from the contaminated groundwater plume. It carried out this work under a Voluntary Remediation Agreement with the Environment Protection Authority (EPA). The cap and contamination at the site are currently managed through a Site Specific Environmental Management Plan and under the supervision of an EPA accredited Site Auditor.

1.4 Surrounding land uses

Bordering the site to the east are two waste recycling facilities (one for food waste and the other for construction waste – see **Figure 2**). To the west there is a shipping container yard and across Grand Avenue to the south (on land owned by Shell) is a bitumen manufacturing plant. The nearest residential properties are about 225 m to the north-east across the Parramatta River at Rydalmere.

The Camellia Peninsula is about 321 ha in area and is largely zoned for heavy industry. The Clyde and Parramatta Terminal (formerly known as the Clyde oil refinery) dominates the eastern portion of the peninsula and the western portion includes private recreation zones for the Rosehill Racecourse, Sydney Speedway and Granville showground, as well as smaller areas zoned for business and general industry (see **Figure 3**).



Figure 3 – Land uses of the Camellia Peninsula

1.5 Camellia Precinct Land Use and Infrastructure Strategy

The Camellia Precinct is identified as a Priority Revitalisation Precinct in the NSW Government's *A Plan for Growing Sydney*. In July 2015, the Department released a strategy on planning options for the Camellia Peninsula in consultation with Parramatta City Council.

The strategy includes improved access to the peninsula via Grand Avenue and James Ruse Drive and includes retention of employment generating heavy industry, commercial, residential and open space land uses. The subject site is located within a heavy industry precinct (see **Figure 4**). The strategy is not a statutory document, but will underpin strategic land use planning for the area to guide its future redevelopment.



Land Use and Transport

Camellia Precinct - Land Use and Infrastructure Strategy

2. PROPOSED DEVELOPMENT

2.1 Description of the proposal

Veolia's proposed facility would be capable of processing up to 200,000 tpa of comingled recyclable material including mixed paper, cardboard, wood, film plastics, hard plastics, metals, and aggregates. Materials would be sourced mainly from Veolia's Port Botany and Greenacre transfer stations and directly from other commercial waste contractors.

A quarter of the waste accepted at the facility would already be source separated and ready for baling (ie wrapped up). The remaining three-quarters would be mechanically processed and up to 45% would be recovered for recycling including paper, plastic, metal, wood and aggregate. Residual waste which cannot be processed or is uneconomic to recycle, will be transported to a licensed landfill facility for disposal.

The proposal includes demolition of a number of existing structures on the site and construction of a new building to enclose a waste tipping floor and the mechanical processing equipment. The facility would employ up to 60 people during construction and 40 during operation and has an estimated capital investment value of \$25 million. The proposed development is described in Veolia's Environmental Impact Statement (EIS) (see **Appendix B**) and summarised in **Table 1** and **Figure 5** below.

Table 1: Summary of proposed development

Aspect	Description				
<i>Summary</i>	Construction and operation of a resource recovery facility to process up to 200,000 tpa of source separated waste from commercial and industrial sources.				
<i>Economics</i>	<ul style="list-style-type: none"> capital investment value: \$25 million; and employment: 60 construction and 40 operational jobs. 				
<i>Waste input</i>	<ul style="list-style-type: none"> 200,000 tpa of non-putrescible waste comprising: <ul style="list-style-type: none"> 50,000 tonnes source separated waste ready for baling and dispatch; and 150,000 tonnes of commercial and industrial waste for mechanical separation. 				
<i>Resource outputs</i>	<ul style="list-style-type: none"> 50,000 tonnes per year of baled source-separated resources; 67,500 recyclable material; and 82,500 tonnes residue waste to be landfilled (ie material which cannot be recycled). 				
<i>Building works</i>	<ul style="list-style-type: none"> a fully enclosed building, which houses a tipping floor and waste processing plant; 2 x weighbridges for incoming and outgoing trucks; 10,000 litre self-bunded diesel tank for mobile plant; 2 x 50,000 litre rainwater tanks; and 2 x 20,000 litre leachate tanks, with collection sump. 				
<i>Machinery</i>	<ul style="list-style-type: none"> 2 loaders, 1 excavator and 2 forklifts; material shredding and sizing machinery; and material separation and sorting technology. 				
<i>Demolition</i>	Demolition of on-site structures except: <ul style="list-style-type: none"> car park area and maintenance workshop; parts of the underground stormwater system in the north of the site; and 3 x liquid waste tanks in the south west of the site. 				
<i>Traffic movements</i>	<ul style="list-style-type: none"> Delivery trucks (return): 88 per day/616 per week (median payload 5.5 tonnes) Dispatch trucks (return): 29 per day/202 per week (median payload 20 tonnes) 				
<i>Construction and operation hours</i>	<table border="0"> <tr> <td>7-day operation:</td> <td>Standard construction hours:</td> </tr> <tr> <td> <ul style="list-style-type: none"> processing hours: 6am-10pm delivery/loading/dispatch: 24 hours </td> <td> <ul style="list-style-type: none"> 7am–6pm Monday to Friday; and 8am–1pm Saturday (no Sunday/public holiday) </td> </tr> </table>	7-day operation:	Standard construction hours:	<ul style="list-style-type: none"> processing hours: 6am-10pm delivery/loading/dispatch: 24 hours 	<ul style="list-style-type: none"> 7am–6pm Monday to Friday; and 8am–1pm Saturday (no Sunday/public holiday)
7-day operation:	Standard construction hours:				
<ul style="list-style-type: none"> processing hours: 6am-10pm delivery/loading/dispatch: 24 hours 	<ul style="list-style-type: none"> 7am–6pm Monday to Friday; and 8am–1pm Saturday (no Sunday/public holiday) 				
<i>Contamination handling</i>	Localised excavation to install the building footings will minimise potential exposure to contaminated soil. Excavation of any contaminated soil will be carried out as recommended by the Construction Environmental Management Plan (CEMP), and consistent with the existing Site Specific Environmental Management Plan.				
<i>Phasing</i>	Demolition: 4 weeks Construction: 9 months				

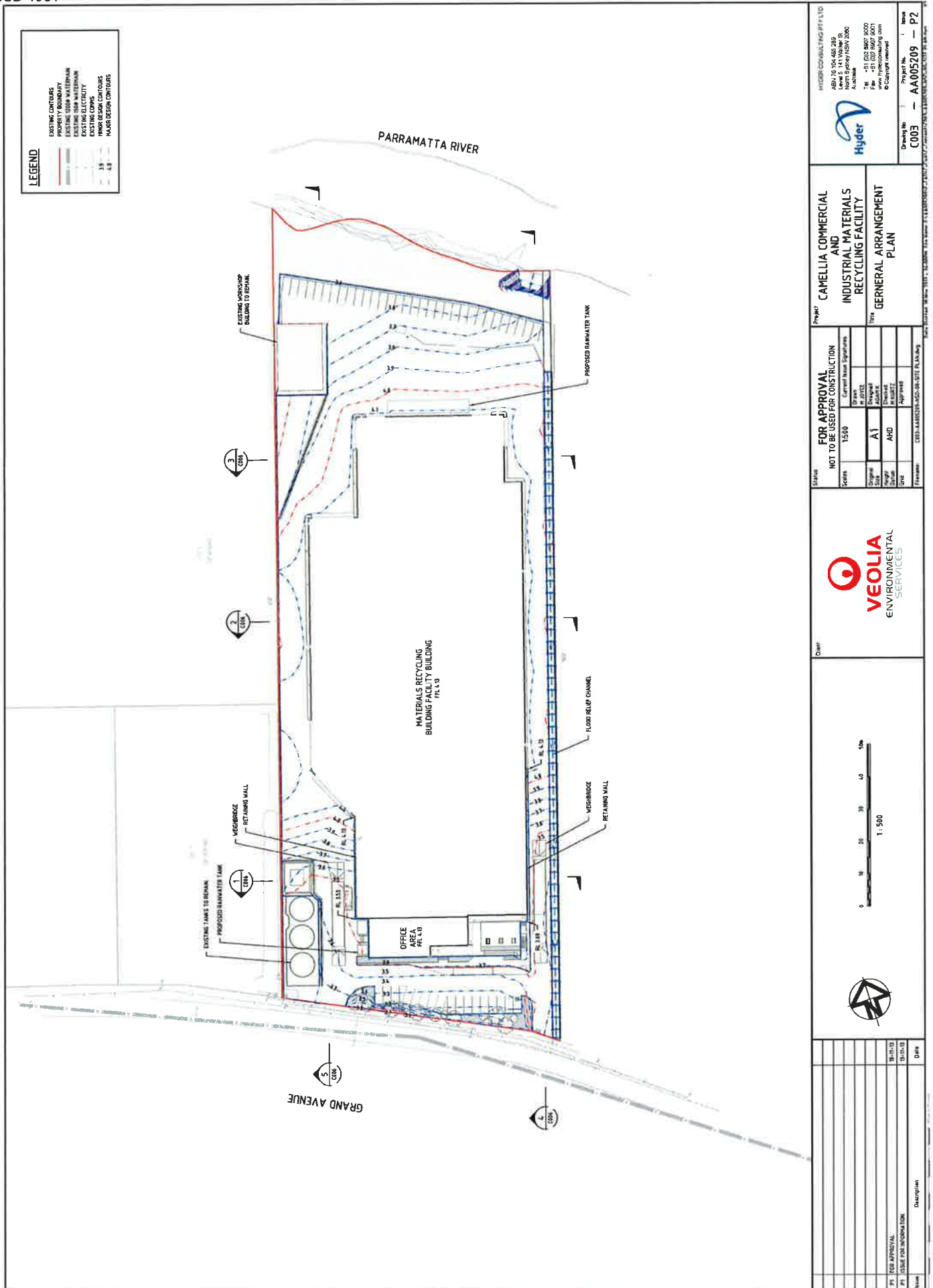


Figure 5: Proposed Development

2.2 Resource recovery process

Receipt of waste

On average, 88 five and a half tonne trucks per day would deliver waste to the fully enclosed facility. Only general solid (non-putrescible) waste from commercial and industrial sources would be accepted. Incoming vehicles would be weighed on arrival (and again on departure, with the difference in weight being the payload). Waste deliveries (and product dispatch) would occur 24 hours per day.

Loads of waste already separated would be stockpiled for baling, while comingled loads would be inspected for non-conforming waste before being tipped to the tipping floor. Up to 60 tonnes of non-conforming waste could be onsite at any one time and this waste would be quarantined before being transferred off site to a suitably licensed facility within 24 hours.

Processing comingled waste

With a throughput capacity of 40 tonnes per hour, processing equipment would operate for up to 16 hours per day between 6 am and 10 pm. The specific combination of processing machines would be decided at installation stage and would include machines to shred incoming waste and a combination of different material separation technologies.

Size reduction

Mobile excavators would load waste material into a shredder while material too large for the shredder would be set aside. From the shredder, the shredded material is conveyed to a rotating trommel for sizing. Large items at the end of the trommel are set aside or returned to the shredder for further sizing.

Separation technology

The re-sized material would pass through a number of different devices to sort material according to its physical properties. Magnets would extract ferrous material while eddy current separators would extract non-ferrous metal. Heavy material such as timber would be separated from light material such as paper and plastic by compressed air or a water bath. Optical technology would separate paper and different kinds of plastic based on light and density properties.

Recovered resources

The materials extracted from the waste stream may include mixed paper, cardboard, wood, film plastics, hard plastics, ferrous and non-ferrous metals, and aggregates. A mass balance for the comingled waste input stream is shown in **Table 2** below:

Table 2 – Mass balance of comingled waste inputs (150,000 tpa)

Resource Output	Amount (tonnes)
Paper and cardboard	6,000
Plastics	9,000
Metals	3,000
Woods	30,000
Aggregate	19,500
Residual for landfill	82,500
Recovery performance rate	45%
Potential future Refuse Derived Fuel (RDF)	6,000
Future recovery performance rate with RDF	49%

Figure 6 shows a process flow diagram of the processes that would occur within the facility.

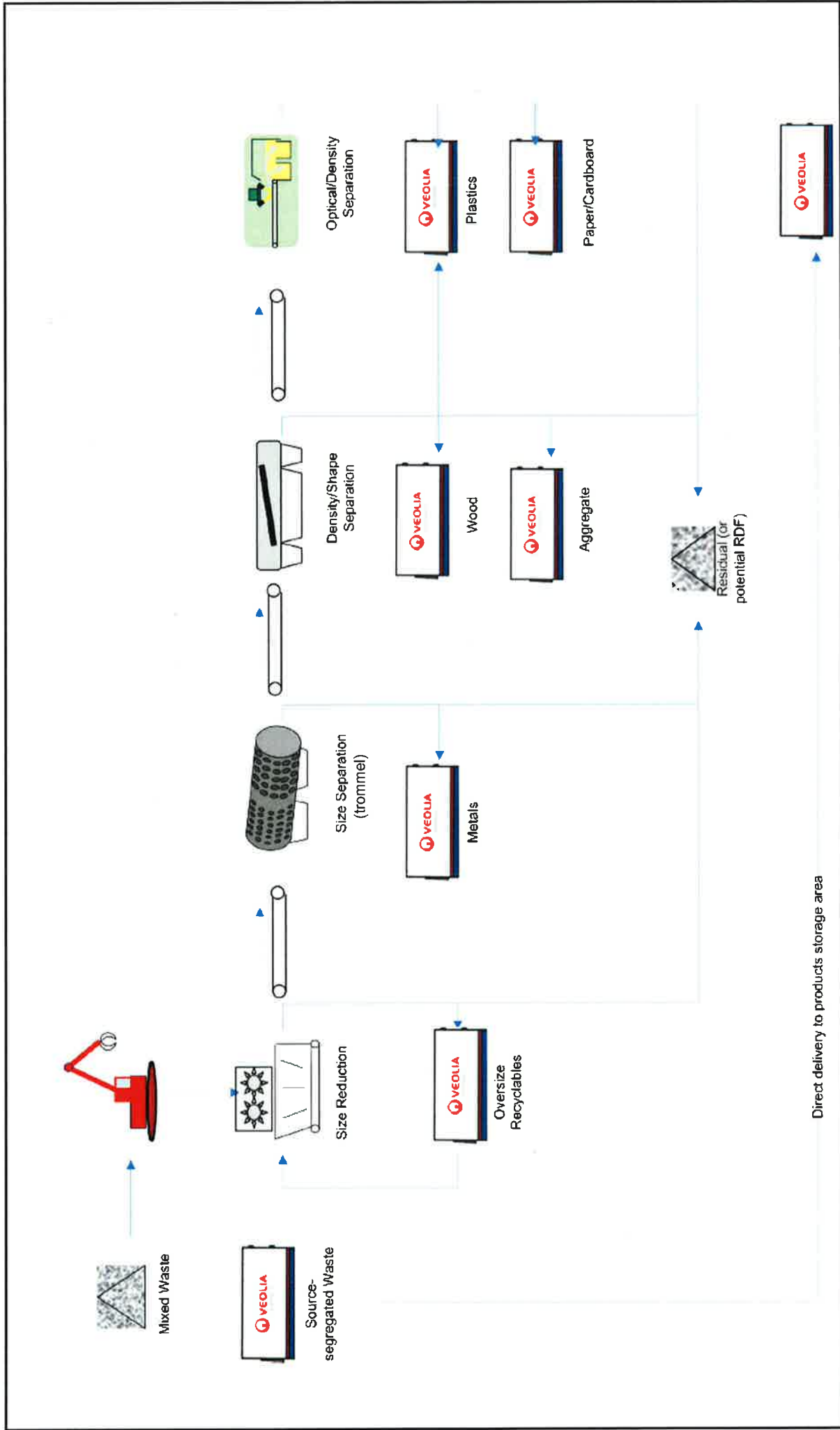


Figure 6: Process Flow Chart for Resource Recovery

3. STRATEGIC AND STATUTORY CONTEXT

3.1 Strategic Overview

Waste Avoidance and Resource Recovery Strategy

Reducing waste and keeping materials circulating within the economy are priorities for the NSW Government. To meet this important challenge, the Government has prepared a state-wide Waste Avoidance and Resource Recovery Strategy. The strategy for 2014-2021 sets resource recovery targets for Commercial and Industrial (C&I) waste of 70%, up from recovery performance in 2010-11 of 57%.

The proposed facility would contribute significantly to the State's recovery performance in the commercial and industrial waste sector.

A Plan for Growing Sydney

A *Plan for Growing Sydney* is the NSW Government's plan for sustainable growth in the Sydney region. It sets out objectives for employment, housing, infrastructure and services. The Plan notes that Sydney will require additional waste management and recycling infrastructure. The proposed development would assist in achieving this objective.

Premier's Priorities

The Premier's Priorities allow the government to measure and deliver projects that create a stronger, healthier and safer NSW. Two of the key priorities for the Premier are job creation and keeping the environment clean. The proposed development would assist in achieving this objective as it will create 60 construction and 40 operational jobs and ensure that the environment is kept clean by increasing recycling.

3.2 State significant development

The proposal is State significant development under Clause 23(3) of Schedule 1 in the *State Environmental Planning Policy (State and Regional Development) 2011* because it involves the development of a resource recovery facility that handles more than 100,000 tpa of waste.

Therefore, the Minister for Planning is the consent authority for the proposed development.

3.3 Consent authority

In accordance with the Minister's delegation dated 14 September 2011, the Planning Assessment Commission must determine the application as Parramatta City Council objected to the proposal and Veolia has disclosed a reportable political donation.

3.4 Permissibility

The site is zoned 'IN3 Heavy Industrial' under the *Parramatta Local Environmental Plan 2011* (PLEP). The proposal involves a waste or resource management facility, which is permitted with consent in this zone.

The IN3 zone is also a prescribed zone under clause 120 of *State Environmental Planning Policy (Infrastructure) 2007*. Waste or resource management facilities are permissible with consent in a prescribed zone.

3.5 Environmental Planning Instruments

Under section 79C of the *Environmental Planning and Assessment Act 1979* (EP&A Act), the Minister must take into consideration any relevant environmental planning instrument including any exhibited draft. The Department has considered the development against the relevant provisions of several relevant instruments including:

- *State Environmental Planning Policy (State and Regional Development) 2011*;

- *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*
- *Parramatta Local Environmental Plan 2013.*

The Department is satisfied that, subject to the implementation of the recommended conditions of consent, the proposal is generally consistent with the aims, objectives and provisions of these instruments (see **Appendix F**).

3.6 Other approvals

Under Section 89K of the EP&A Act, a further approval is required, and must be approved in a manner that is consistent with any consent. The development requires the existing Environment Protection Licence (EPL) EPL No. 4806 from the Environment Protection Authority (EPA) under the *Protection of the Environment Operations Act 1997* (POEO Act) to be amended, to cover the new scheduled activities of recovering and storing waste.

The Department has consulted with the EPA and considered the relevant issues relating to the issue of an EPL in the assessment of the proposal (see Section 5 of this report). The EPA has provided draft conditions for an amended EPL for the facility.

3.7 Objects of the *Environmental Planning and Assessment Act 1979*

The Minister must consider the objects of the Act when making decisions under the Act. The objects of most relevance to the Minister's decision whether to approve the application are in section 5(a)(i),(ii),(vi) and (vii) of the Act. They are to encourage:

- (i) *the proper management, development and conservation of natural and artificial resources, including agricultural land, natural areas, forests, minerals, water, cities, towns and villages for the purpose of promoting the social and economic welfare of the community and a better environment;*
- (ii) *the promotion and co-ordination of the orderly and economic use and development of land;*
- (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 habitat; and*
- (vii) *ecologically sustainable development.*

The Department's assessment concludes that the proposed development encourages the proper management of waste resources and the orderly and economic development of land. In particular, the proposal is a permissible use on heavy industrial zoned land. The site is also strategically located with access to major regional road networks in particular the M4 motorway.

The Department recognises the potential impacts on other land uses nearby, particularly in relation to flooding, traffic, air and noise and has assessed potential impacts in detail in Section 5 of this report. The Department's assessment has concluded the development may be undertaken in a manner that would not result in unacceptable impacts on the environment or other land uses. The Department has recommended a number of consent conditions to minimise residual environmental impacts as far as practicable.

The Department has considered ecologically sustainable development in its assessment of the proposed development. This assessment integrates all socio-economic and environmental considerations and seeks to avoid potentially serious or irreversible environmental damage based on appraisal of risk weighted consequences. The Department is satisfied the proposal can be carried out in a manner that is consistent with the principles of ecologically sustainable development.

3.8 Exhibition and Notification

Under Section 89F(1) of the EP&A Act, the Secretary is required to make the development application and any accompanying information of an SSD application publicly available for at least 30 days.

After accepting the EIS for the application, the Department:

- made it publicly available from **Thursday 7 March 2013** until **Friday 12 April 2013**:
 - on the Department's website;
 - at the Department's Information Centre (Bridge Street, Sydney);
 - at the Department's Parramatta Office;
 - at the Nature Conservation Council's Head Office (Sydney); and
 - at Parramatta City Council;
- notified landowners in the vicinity of the site about the exhibition period by letter;
- notified relevant State government authorities and Parramatta City Council by letter; and
- advertised the exhibition in the Parramatta Advertiser.

4. CONSULTATION

Five submissions were received during the exhibition period, comprising four submissions from public authorities and one submission from the general public.

4.1 Public authority submissions

Four submissions were received from public authorities. Parramatta City Council objected to the proposal. The key issues raised in public authority submissions are summarised below.

The **Environment Protection Authority (EPA)** advised it would be able to issue an EPL for the facility, subject to standard conditions. The EPA also recommended a condition specifying noise limits and another condition specifying an odour audit of the facility in operation.

However following further discussions, both the EPA and Department considered that noise limits would not be included in the conditions as predicted noise levels would be well below measured background noise. The EPA will continue to govern noise monitoring requirements under the EPL.

The Department has recommended a consent condition requiring an odour audit of the facility in full operation. The audit would validate the odour emissions with the predictions in the EIS. If the emissions cannot be validated, the Department would be able to specify additional odour controls for the facility.

Sydney Regional Development Advisory Committee raised no objection to the proposed development. RMS previously advised the Department that the proposed development would further impact on access from James Ruse Drive (presently the only access point to the peninsula), and that this should be resolved in the strategic planning for the area.

Sydney Water advised that a trade waste application would be required for connection to the sewer. The Department has included an appropriate condition in the recommendation. Veolia may need to negotiate infrastructure upgrades with Sydney Water as part of the trade waste application process, depending on the quality of water to be discharged to sewer.

Parramatta City Council objected to the proposal on the following grounds:

- potential odour and noise impacts on business and residential properties;
- inadequate traffic access with very limited capacity at the bridge on Grand Avenue. The bridge should be upgraded before any further development;

- potential impacts to the pavement in Grand Avenue;
- incompatibility with Council's vision for the Camellia Peninsula, which is a campus style business park;
- potential flooding impacts to and resulting from the facility and inadequate assessment against Council's *Floodplain Matrix*, including a lack of detail about evacuation and refuge during flooding;
- lack of detail about the complex stormwater arrangements for the facility; and
- lack of a detailed landscape plan.

The Department and Council had ongoing dialogue to discuss the issues identified by Council and to identify a solution to the concerns raised, particularly in relation to the flooding issues.

Veolia provided additional information about the potential flooding impacts to and resulting from the facility in its Response to Submissions report, and the Department has assessed this and Council's other issues in section 5 of this report.

4.2 Public submission

One submission objecting to the proposal was received. The submission raised concerns about the lack of community consultation for residents west of James Ruse Drive, impacts to the visual environment along the Parramatta River, flaws in the hazard analysis, release of contaminated materials and dust and odour impacts.

The Department has assessed these issues in section 5 of this report.

4.3 Response to submissions

Veolia provided a Response to Submissions (RTS) report in December 2013, and supplementary information regarding flooding impacts in September 2015 and January 2016. The RTS specified a number of amendments to the proposal, including:

- use of the existing liquid waste tanks in the south-west corner of the site for fire water management;
- a revised building layout with a slightly higher floor level to ensure the building is above the 1 in 100 flood level; and
- re-grading the existing road surface in the northern part of the site to improve flooding impacts resulting from the development.

The RTS did not fully address Council's concerns about flood impacts and Veolia was unable to engineer a design to avoid minor increase in flooding on adjoining land. This matter is addressed further in section 5.1 of this report.

5. ASSESSMENT

In assessing the merits of the proposal, the Department has considered the EIS (Appendix D), the submissions and the RTS report (Appendices E & F). The assessment has involved consideration of the provisions of relevant EPIs, Section 79C and the objects of the EP&A Act, including the object to encourage ecologically sustainable development.

The Department considers the key issues associated with the development to be flooding, traffic, air quality and noise, which are addressed in Sections 5.1 to 5.4 below. All other issues are addressed in Table 4 in Section 5.5.

5.1 Flooding

Flooding is widespread on the Camellia Peninsula. It is caused by rising levels in the Parramatta River during wet weather events, and from shorter term overland run-off exceeding the capacity of the local drainage network.

Council has previously carried out a detailed study of flooding from the river in the *Lower Parramatta River Floodplain Risk Management Study and Plan (2005)*. In this plan, Veolia's site is within a medium flood risk precinct as it is subject to 1 in 100 year Average Recurrence Interval (ARI) flooding with a low hydraulic hazard. The site is a low point in the north-east of the peninsula, and occasionally becomes inundated with excess overland flow from Grand Avenue.

Flooding impacts

The EIS included an assessment of flooding impacts on the proposed development. The floor level of the new building would be built at RL 4.13 m AHD, which is 500 mm above the 1 in 100 year ARI flood level from the Parramatta River. The EIS noted the proposed development would require changes to the existing stormwater system on the site to manage overland flow from Grand Avenue. The Department notes that contaminated soils beneath the site complicate the construction of new underground stormwater infrastructure and therefore stormwater infrastructure is required to be open channelled on the land surface.

The EIS did not originally provide details of impacts from the development on the behaviour of flooding on adjoining land, or provide details on managing operational flooding risks (such as access, evacuation and asset protection). Council raised these issues in its submission and noted the proposed development should not increase flooding on adjoining land.

Veolia provided supplementary reports showing the extent of impacts to adjoining land, and an emergency response plan for the site (see **Appendix E**). However, Veolia has been unable to engineer a design to avoid small increases in flooding on adjoining land. The change in flood depth for adjoining land is described in **Table 3**. There would be no change to flow speed and the hydraulic hazard would remain low on the affected land.

Table 3 – Predicted change in flood depth on adjoining land

Adjoining land	Existing flooding depth	Predicted change in flooding depth
Grand Avenue	200mm to 400mm	20mm to 100mm
Shell (to the south)	400mm to 600mm	20mm to 100mm
Concrete recyclers (to the west)	400mm to 600mm	-20mm to +20mm

The Department has reproduced map extracts for the two peak events from Veolia's flood maps to indicate predicted flooding impacts on adjoining land. These extracts are shown in **Figures 7 and 8**.

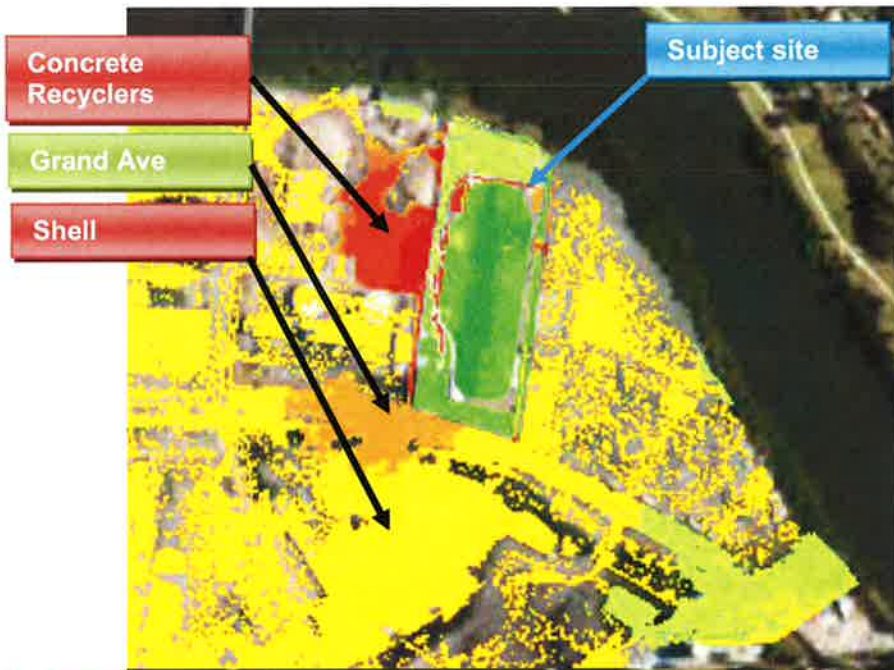


Figure 7 – Change in flood depth resulting from the proposed development during 100 year ARI 9 hour (riverine) flood event.

Change in depth key (metres):

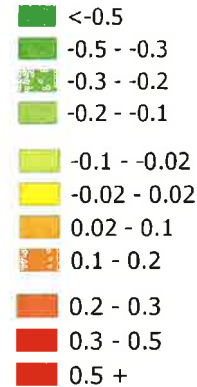
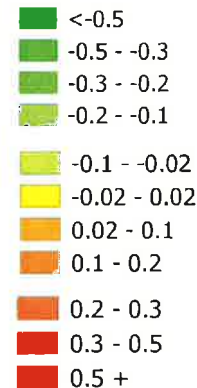


Figure 8 – Change in flood depth resulting from the proposed development during 100 year ARI 25 minute overland flow (stormwater) flood event.

Change in depth key (metres):



The average change in flood depth for the adjoining Concrete Recyclers site is in the order of 500mm as illustrated by **Figures 7** and **8**. However, the Proponent's assessment states that the hydrology model incorrectly attributed this increase to the proposed development. It actually results from the repair of an existing wall on the boundary and is a pre-existing impact. The change in flood depth on the Concrete Recyclers site is as indicated in **Table 3** (that is up to 20mm).

Assessment of flooding impacts

Council maintains concerns about the proposed development on the basis of these small flood increases (as shown in Table 3). However, the Department notes:

- the additional flood impacts on the Shell bitumen plant and Concrete Recyclers are in the order of 20mm to 100mm in depth, which is a small addition on the existing flood depths of 400mm to 600mm. Despite this, existing buildings in the area will still remain above the increase in flood level;
- the adjoining properties contain stockpiles that are likely to impact local flooding, depending on the size and arrangement of stockpiles at any given time;
- the additional 20mm to 100mm impact to Grand Avenue is localised and minor. During a 1 in 100 year flood, the road is already non-trafficable due to 200mm to 400mm of flood depth. The proposal does not change the velocity or hazard characteristics of water on the road;
- will not affect any residential property or residential area;
- flooding from the Parramatta River is wide spread on Camellia Peninsula due to inadequate public stormwater infrastructure and as a result properties in the area are vulnerable to overland flow from Grand Avenue;
- engineering on the site to deal with the excess overland flow would be difficult. A deep channel would be required to traverse the site to convey stormwater from the road to the river. Given the contaminated soil issues on site, such a channel would increase the risk of hexavalent chromium contamination leaching to the Parramatta River which is unacceptable; and
- future public works in Grand Avenue associated with the NSW Government's land use and infrastructure strategy for the Camellia Peninsula will improve flooding from the overland flow for the site and adjoining land uses.

The Department has also considered the NSW Government's Floodplain Development Manual (2005) for guidance on the assessment of the predicted flood impacts. The manual specifies a number of relevant policy objectives, which are:

- adopting a merit approach for all development decisions to take account of social, economic and ecological factors, as well as flooding;
- the impact of flooding and flood liability for developed areas shall be reduced by flood mitigation measures, emergency management measures and development controls;
- potential for flood losses in new developments shall be contained by ecologically sensitive planning and development controls; and, for development applications
- a fundamental principle of floodplain risk management is to assess development applications within a strategic framework and not in isolation.

Conclusion on flooding impacts

Flooding is a complex issue in the Camellia Precinct and has been an existing issue for some time. The Department acknowledges the concerns raised by Council and has endeavoured to resolve this issue with Council. This has included arranging a number of meetings with Council and Veolia to address this issue.

The Department's assessment has concluded that flooding impacts from the development are unlikely to lead to significant impacts. While flood levels are predicted to slightly increase, these increases are considered to be minor in the context of existing flood levels that currently occur. In addition, the flooding assessment has found the predicted changes will not alter the existing hydraulic hazard category of the site, nor increase flow velocities during a flood event. Therefore, the development is unlikely to greatly alter flooding impacts off-site.

In part, the impacts are a result of the particular characteristics of drainage infrastructure on the Camellia Peninsula, which make the site vulnerable to overland flow from Grand Avenue. An immediate solution would involve excavating into soil contaminated with hexavalent chromium for deep drainage. However, this is highly likely to result in contamination leaching

from the soil into the river with undesirable ecological and human health impacts. These options were strongly objected to by both the EPA and the Department.

A longer term solution involves improving drainage infrastructure in Grand Avenue. While not immediately planned or budgeted, these improvements are within the scope of the NSW Government's *Camellia Precinct Land Use and Infrastructure Strategy*. In the strategy, Grand Avenue is identified as both 'Grand Boulevard' and a public transport rail corridor. It will ultimately require substantial infrastructure upgrades (including stormwater upgrades) to serve those purposes.

In the Department's view, the predicted flood impacts resulting from the development are minor, difficult to avoid for any development of the site and temporary. When balanced with the benefits of the proposed development such as the economic use of industrial land and the additional waste recycling capacity for Sydney, the Department believes such impacts are approvable.

However, to ensure the proposed development has minimal exposure to flood related impacts, the Department has recommended a number of conditions, including:

- a minimum floor level of RL 4.13 m AHD, 500mm above the 1 in 100 year ARI flood;
- use of appropriate engineering to ensure structures are designed for a probable maximum flood event;
- a berm at front of site RL 3.76 m AHD to preclude local flows up to 1 in 20 year ARI;
- site surface drainage to drain towards Parramatta River where possible;
- one-way stormwater valves connecting to the Parramatta River to prevent water entering the system from river; and
- a detailed flood emergency response plan to the Secretary's satisfaction, which describes emergency procedures, warning and notification measures and awareness training for employees.

The Department believes this to be the most appropriate outcome and has discussed this approach with Council prior to finalising its assessment.

5.2 Traffic and Access

The proposed recycling facility would generate heavy vehicle movements through delivery of waste material and despatch of recoverable products and residual wastes. Increased vehicle traffic has the potential to impact on the capacity of nearby intersections and the safety of the local road network.

The EIS included a Traffic Impact Assessment (TIA) prepared by Halcrow. The TIA analysed existing intersection performance and predicted impacts from the increased traffic associated with the proposal. The TIA also considered the proposed site access and parking arrangements for small and heavy vehicles.

The site is located on Grand Avenue, which is a local road servicing the industrial sites on the Camellia Peninsula. The site can be accessed via two key routes, the primary route being via the James Ruse Drive/Grand Avenue intersection and the secondary route through the Camellia Peninsula using Colquhoun, Unwin, Kay and Wentworth Streets to access Parramatta Road (see **Figure 9**).

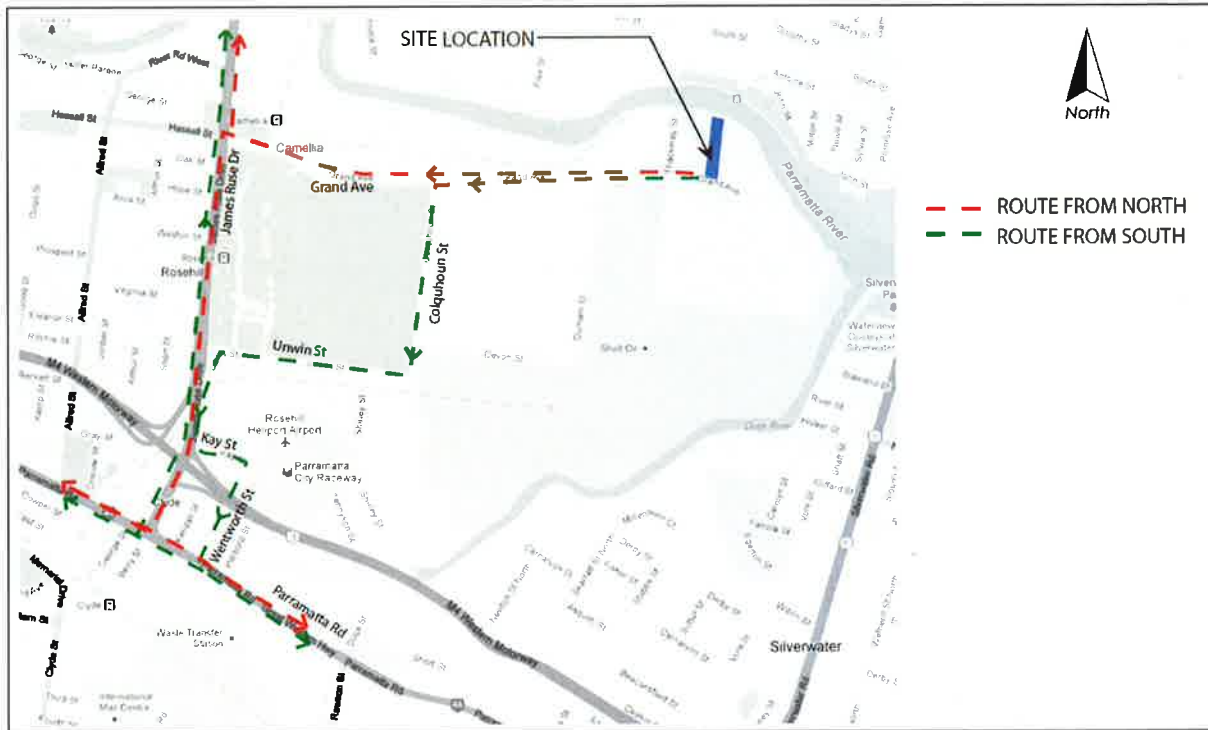


Figure 9: Existing road network and location of site

Construction traffic impacts

Construction is predicted to take place over a nine month period. The volume of construction traffic is expected to be similar to operation traffic and similar routes are expected to be used (as discussed below). It is not expected that construction will cause a significant impact on the surrounding road network; however the additional traffic may cause minor short-term traffic disruptions associated with construction traffic movements during the construction period.

In order to mitigate construction traffic impacts, Veolia proposes to prepare a detailed construction traffic management plan as part of a Construction Environmental Management Plan. Construction vehicles would not obstruct roadways or private driveways, and private worker vehicles would be parked on the site and not on Grand Avenue.

Operational traffic impacts

The TIA noted the capacity (level of service) of the two key intersections proposed to be utilised as:

- James Ruse Drive and Grand Avenue – Level of Service D (AM peak) and F (PM peak); and
- Parramatta Road and Wentworth Street – Level of Service A (AM and PM peak).

Level of service D is considered to be operating near capacity and F exceeds capacity with extreme delays. Both Council and RMS in their submissions noted the James Ruse Drive/Grand Avenue intersection requires upgrading, however RMS noted it would be cost prohibitive for Veolia to undertake the required upgrades.

The TIA estimated traffic volumes for operation of the development utilising data from other similar facilities operated by Veolia in Sydney. The TIA noted the development would generate:

- a total of 117 heavy vehicles per day, over a 24 hour period;
- a maximum of 9 heavy vehicle trips per hour in the AM peak; and

- a maximum of 38 staff trips during the peak shift-change period (outside of commuter peak hour periods).

When compared with the existing traffic levels of 6,750 vehicles per hour (vph) at the James Ruse Drive/Grand Avenue intersection and 3,700 vph at the Wentworth Street/Parramatta Road intersection, the increased traffic from the development would not be significant, representing an increase of 0.13% and 0.24% respectively. The TIA concluded that while the James Ruse Drive/Grand Avenue intersection is operating above capacity, the development would have a negligible impact on the performance of the intersection.

The Department agrees with the conclusions of the assessment and notes the increased traffic from the development is minor in the context of existing traffic volumes at the key intersections. Both Council and RMS noted the intersection requires upgrading. Council specifically requested Veolia contribute funding towards the upgrade. The Department recommends Veolia provide contributions in accordance with Council's *Section 94A Development Contributions Plan 2013*. This would ensure financial contributions are made relevant to the scale of the development and its projected demand on local services such as roads and intersections. In addition, the Department has recommended a number of conditions requiring internal roads, turning areas and parking to comply with relevant standards and includes restrictions on parking on the public road network. The Department's assessment concludes that with these measures in place, impacts of the development on the local road network would be minimised.

5.3 Air quality and odour

The development has the potential to disturb contaminated material containing hexavalent chromium and asbestos fibres during the construction and demolition phase and emit odour during the operational phase of the development.

Background air quality

An environmental risk assessment was prepared by CH2M HILL Australia Pty Ltd. As part of the risk assessment, background dust monitoring was undertaken to measure background dust levels at the site. Chromium and hexavalent chromium were tested but not detected in the particulate matter, however total particulates (4.4 g/m²/month and 6.1 g/m²/month) were identified as being above the EPA criteria for dust deposition (exceeding the 4 g/m²/month criteria limit) (DEC, 2005). The EIS suggests the exceedance may be a result of the site's close proximity to other recycling facilities and unsealed roads in the area.

Construction phase air quality impacts

The site currently has a concrete hardstand and cap to manage soil exposure, limiting soil exposure and dust generation. However, where the cap is temporarily removed such as during earthworks, foundation work or installation of services, dust impacts may occur. Dust and emissions may also occur during the demolition of existing structure and from the exhaust emissions from traffic and machinery.

To address potential impacts, Veolia propose to use dust suppression measures on exposed areas and stockpiles, ensuring all trucks have loads covered and regular cleaning and maintenance of the roads and vehicles. Air monitors would be set up around the site to monitor key air quality parameters including dust and potential contaminants during the duration of construction. Veolia will also develop an asbestos management plan for construction works.

While a quantitative assessment of particulate emissions had not been undertaken, the EPA considered the proposed mitigation measures should adequately address air impacts during construction.

The Department's assessment concludes that the potential construction air quality impacts would be minimal and adequately managed with the proposed mitigation measures. Dust generated during construction would be localised to the existing site and adjacent industrial lots and would be short-term. The Department has recommended strict consent conditions to ensure that Veolia implements the mitigation measures set out in the EIS.

Operational phase air quality impacts

Odour has been identified as the key air quality issue when the facility is built and operational, primary as dust emissions would be minimal once construction has been completed. An odour impact assessment was prepared by CH2M HILL Australia Pty Ltd to determine the potential odour impacts on surrounding sensitive receivers. To strengthen the assessment, odour sampling was conducted at Veolia's existing Port Botany Resource Recovery Centre which receives similar materials to that proposed at Camellia. This data was incorporated into the odour modelling. The modelling was also undertaken in accordance with the *Technical Framework – Assessment and Management of Odour from Stationary Sources in NSW* (DEC, 2006).

The odour assessment concluded the operation of the recycling facility would comply with the EPA's most stringent criteria of 2 odour unit's (OU) at the nearest residential receivers. The 2 OU contour lies mostly within the site's boundary, but does extend beyond the boundary into a small area of industrial land immediately adjacent to the site. At an industrial receiver, the odour criterion is 7 OU which the assessment shows would be complied with. The odour assessment and predicted 2 OU contour is shown in **Figure 10** below.

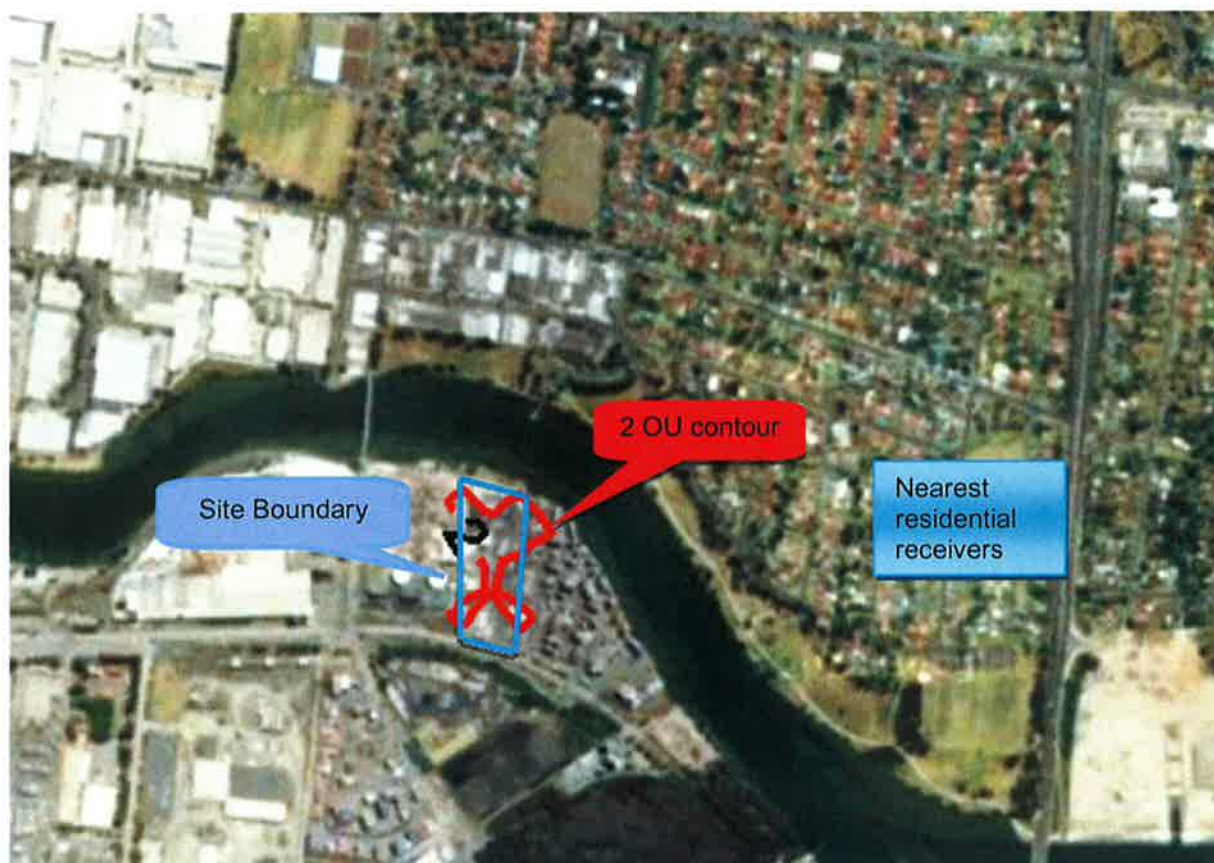


Figure 10: Predicted 2 OU contour

Veolia proposes to mitigate operational air quality impacts by ensuring the building is fitted with air conditioning to help air quality within confined spaces and to ensure the building is enclosed.

The EPA indicated it is satisfied with the odour assessment and recommended Veolia conduct an odour audit within the first 6-12 months of operation to ensure the risk of offsite emissions is minimised as far as practicable.

The Department's assessment concludes that the predicted odour impacts of the development would meet the EPA's odour criteria at all receivers. To ensure odour impacts are adequately managed, it has recommended in the conditions of consent that an odour audit be undertaken within 6 months of operations. The odour audit would ensure any unexpected odour impacts are identified and adequately mitigated.

5.4 Noise impacts

The development has the potential to generate noise impacts at sensitive receivers, during construction and operation of the development.

The proposed development is located within an established industrial area in Camellia Peninsula, however the nearest residential receivers are located approximately 230 metres to the north-east in John Street, Rydalmere, across the Parramatta River (See **Figure 11**).

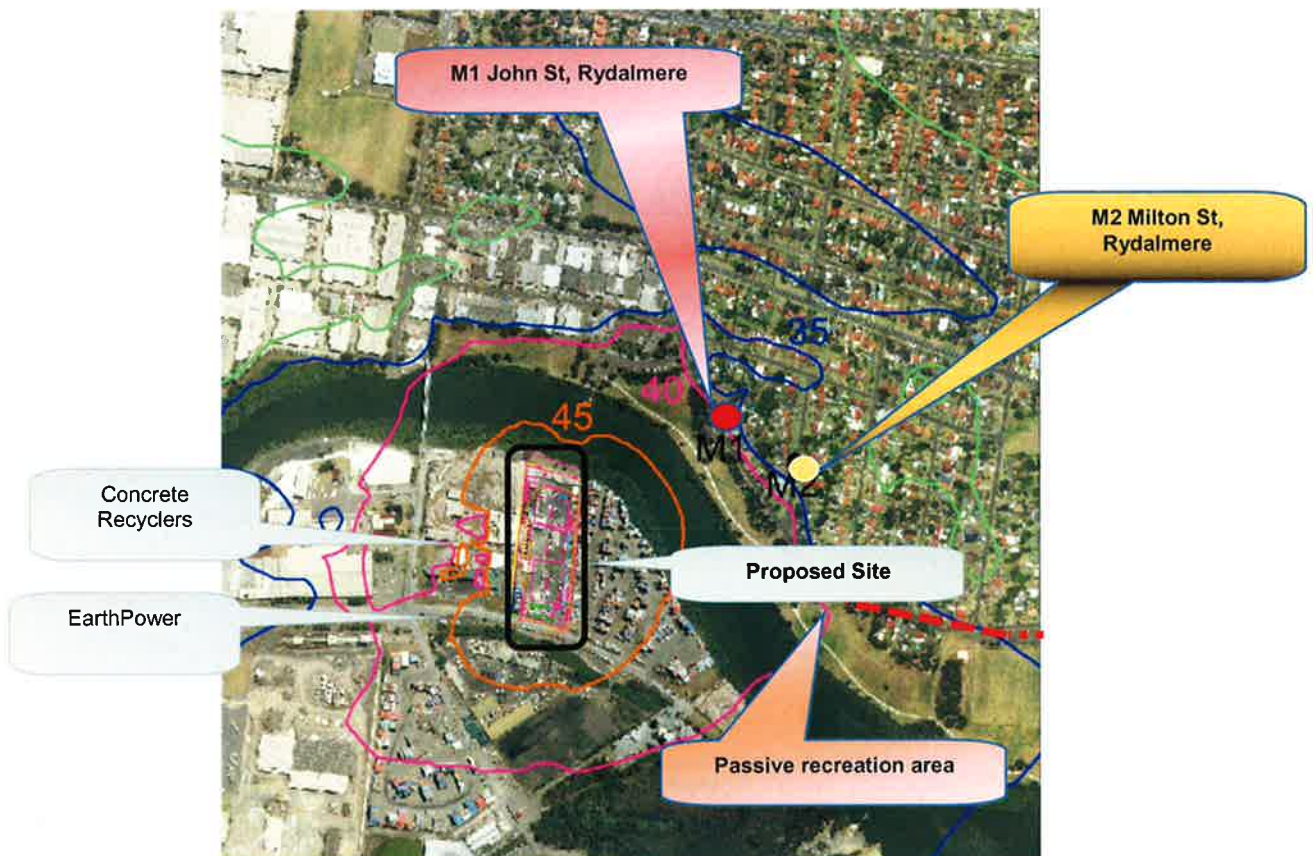


Figure 11: Operational noise contours, temperature inversion, LAeq 15 min

The EIS included a noise impact assessment (NIA) prepared by Bridges Acoustics, which considered noise emissions from construction and demolition, operation and road traffic. Background noise at sensitive residential receivers was measured at John St (M1) and Milton St (M2), Rydalmere.

Construction and demolition

The construction and demolition phase will occur over a nine month period. The EIS established a construction noise criteria for sensitive residential properties in accordance

with the *Interim Construction Noise Guidelines* (DECC, 2009). Construction noise sources have been assessed on a worst case scenario in terms of equipment required during earthworks and the laying of foundations.

The report predicted there would be no exceedances of the construction noise criteria at any nearby residential or industrial receivers. However, there may be short-term day time exceedances by up to 4 dB(A), in the 'passive recreation' area on the northern side of the Parramatta River while earth moving occurs (see **Figure 11**).

Veolia has committed to implement a number of noise mitigation measures during construction. This includes the preparation of a Construction Noise Management Plan to set out standard construction hours; the use of appropriate machines; and a community information strategy to notify affected residential receivers when noisy works are to be undertaken.

The EPA did not raise any concerns regarding potential construction noise impacts. The Department's assessment concludes that construction noise will meet the relevant criteria at all sensitive receivers. While there may be some minor noise exceedance at a 'passive recreation' area, this exceedance will be short-term and only occur during earthmoving works. The Department has recommended noise limits during construction and demolition to ensure Veolia implements the mitigation measures set out in the EIS.

Operational phase noise impacts

Key operational noise sources from the proposed development relate to on-site and off-site truck movements and waste processing activities. The facility would include a number of waste processing machines such as shredders, screens, sorters, conveyors, loaders, forklifts and an excavator operating within the building. Incoming and outgoing waste delivery trucks would operate during day and night-time period. Waste processing activities would not be operational at night, except for the shoulder period from 6am to 7am (at which time Silverwater Road traffic noise and other sources would generally be significant).

The operational noise model predicted a slight exceedance of the sleep disturbance criteria may be experienced at the closest John Street residences (see Figure 11). This may occur if truck brakes were to be used at the north and north-eastern portion of the property. In this event, reflection off the recycling centre building would tend to increase truck noise levels by 2 to 3 dB(A) and would therefore cause a maximum noise level of up to 57 dB(A), a 1 dB(A) exceedance of the adopted sleep disturbance criteria. To address the exceedance, Veolia proposes to install a steel fence along the northern side of the truck path which would reduce noise levels by 1 dB(A). Given that the facility would operate at or close to the sleep disturbance criteria, the Department has included a condition that a fence be installed on the northern side of the site.

The report predicted there would be no other exceedances of operational noise criteria at any residential receiver. The maximum predicted night noise levels would reach 40 dB(A) at the front of the closest John Street residences which meets the noise criteria of 43 dB(A).

The report also predicted there would be no exceedances of operation noise criteria for both industrial and passive recreational users in the vicinity of the site. Road traffic noise levels during operation would also comply with the road criteria and be at least 10 dB(A) below existing traffic noise levels.

Veolia has committed to implementing a number of noise mitigation measures during operation of the Proposal. This includes measures to ensure that all machinery used is appropriate and in good condition, maintaining the site speed limit of 20 km/hr and the

inclusion of a no heavy vehicle stopping area along the internal northern boundary of the site.

The EPA is satisfied that annual noise monitoring would not be necessary given that the noise impact assessment demonstrates that noise limits could be met. Parramatta City Council has raised concern that noise from the proposal would unacceptably impact on surrounding businesses and residential properties in the area.

The Department's assessment has concluded that all aspects of the development including construction, operation and road noise can be adequately managed. Additionally, exceedance of the sleep disturbance criteria by 1 dBA at night during the use of truck brakes would be mitigated by the construction of a steel fence along the northern and north-eastern side of the internal truck path.

5.5 Other issues

The Department's assessment of other issues is provided in Table 4 below.

Table 4: Assessment of other issues

Assessment	Recommended Conditions
Hazard and Risk Management	
<ul style="list-style-type: none"> During construction, small volumes of fuels and chemicals may be stored on site for use by machinery and equipment. Veolia has committed to a number of mitigation measures to eliminate the potential for these substances to spill into the surrounding environment, including the use of spill kits and emergency response measures. The proposed development does not trigger <i>State Environmental Planning Policy 33</i> (Hazardous and Offensive Development) as significant quantities of dangerous goods or hazardous materials would not be stored on site. As such, it is not potentially hazardous development. Notwithstanding, Veolia's EIS included a Preliminary Hazard Analysis (PHA) which identified the potential hazards during operation include vehicle fire; waste or recycled materials fire; flooding; breach of security/sabotage; or a fire in the diesel storage area. To manage these risks, Veolia has committed to maintaining and updating existing safety management procedures and emergency response plans, and implementing a range of fire protection measures. The Department's assessment concludes the risk posed by the facility on the surrounding land uses is negligible. 	<p>Recommended conditions require Veolia to implement suitable measures to minimise the risk of fire on-site.</p>
Waste	
<ul style="list-style-type: none"> During construction, infrastructure from the former liquid waste facility would be removed and sold to third parties, where possible. Remaining waste would include decommissioned machinery; general construction waste; domestic waste brought on site by workers; and contaminated material. Veolia would manage construction waste in accordance with the <i>Waste Classification Guidelines</i> (DECCW, 2009). The management of contaminated waste is discussed below. During operation, materials delivered to the site would be processed through a range of sorting processes, both manual and automatic. Any material that is not recoverable during the sorting process would be transported to a suitably licensed disposal facility. Any liquid waste generated on site would be collected in leachate tanks and disposed of offsite in a suitably licensed facility. The Department's assessment concludes that the sorting of waste at the facility for future recycling opportunities would reduce the amount of waste sent to landfill, contributing to the elimination of waste. 	<p>Recommended conditions require Veolia to</p> <ul style="list-style-type: none"> prepare a Waste Monitoring Program; and store processed and unprocessed waste within the building on site.
Soils and Contamination	
<ul style="list-style-type: none"> The EPA issued Veolia a Remediation Site Notice in December 2005, after the EPA determined the levels of hexavalent chromium (Cr (VI)) presented a 'significant risk of harm' to human health and the environment. An investigation undertaken by Veolia confirmed high levels 	<p>Recommended conditions require Veolia to:</p> <ul style="list-style-type: none"> implement acid sulfate soils management

Assessment	Recommended Conditions
<p>of Cr (VI) in the groundwater beneath the site and elevated levels of Cr (VI) in the soil where the fill had been locally contaminated with Chrome Ore Processing Residue (COPR) (this was sporadically used before Veolia owned the site).</p> <ul style="list-style-type: none"> • A Remedial Action Plan prepared by CH2M Hill, as part of a Voluntary Management Proposal process, proposed a range of measures to be implemented to reduce the flow of groundwater into the Parramatta River including the construction of a permeable reactive barrier. • The site has been capped with asphalt to contain and minimise exposure to contaminated soil. • During construction, Veolia has committed to a number of mitigation measures, including: <ul style="list-style-type: none"> ○ incorporating the existing Site EMP into the wider CEMP for the Proposal; ○ establishing air monitors around the site prior to excavating the cap; ○ briefing staff on site contamination issues; ○ decontaminating all equipment once excavations are complete; ○ developing a Health and Safety plan for the site; ○ minimising excavations on site; ○ stockpiling and covering contaminated materials; ○ implementing sedimentation and erosion mitigation measures prior to construction; and ○ ceasing work immediately should any contaminated material be encountered. • The EPA raised no concerns in relation to the management of contamination. • The Department's assessment concludes the proposed mitigation measures would effectively manage impacts from contamination. Where the cap would be breached, disturbed areas would be stabilised as soon as possible and in a progressive manner as works are completed. 	<p>measures in accordance with the guidance in the NSW Acid Sulfate Soil Management Advisory Committee's <i>Acid Sulfate Soil Manual</i>; and</p> <ul style="list-style-type: none"> • store all chemicals, fuels and oils used on-site in appropriately bunded areas.
<p>Visual amenity</p> <ul style="list-style-type: none"> • The site is located in a well-developed industrial area, with the primary vantage points being from Grand Avenue and the surrounding industries. The closest residences are located some 230 m north-east of the site. • Veolia proposes the following mitigation measures in relation to visual impacts: <ul style="list-style-type: none"> ○ develop a landscaping plan as part of detailed design; ○ paint the walls and roof of the new building green in line with the foreshore vegetation; and ○ install external light fittings and fixtures in a manner which directs lighting downwards. • During operation, waste recovery operations would take place within the new structure and would therefore be obscured from view. The building would be larger than the overall scale of the existing building on site, and would be visible from some vantage points in Rydalmere. • The above measures would ensure the building blends with the surrounding vegetation and any views would be consistent with the industrial nature of the area. • The Department's assessment concludes that the visual impacts from the development would be negligible and consistent with the industrial nature of the area. 	<p>Recommended conditions require Veolia to:</p> <ul style="list-style-type: none"> • mount, screen and direct all lighting in a manner as to not create nuisance to the surrounding environment; • install signage in consultation with Council; and • develop a Landscape Management Plan.

6. CONCLUSION

The Department has assessed the merits of the development having regard to the objects of the EP&A Act and the principles of ecologically sustainable development.

The assessment has concluded that with the implementation of the recommended conditions of approval, the impacts of the development can be mitigated and/or managed to ensure an acceptable level of environmental performance. When balanced with the benefits of the proposed development such as the economic use of industrial land and the additional waste recycling capacity for Sydney, the Department believes such impacts are approvable.

The proposal will recover significant volumes of recyclable waste from the commercial and industrial waste stream and divert them from landfill. The development would also enable the extension of the life of existing landfills through increased diversion of non-putrescible waste from landfill. The proposal is consistent with the NSW Government's direction in achieving the targets of NSW 2021 and the Waste Avoidance and Resource Recovery Strategy and would contribute significantly to the State's recovery performance in the commercial and industrial waste sector.

Overall the Department's assessment concluded that:

- the facility would meet relevant air and noise criteria with the mitigation measures implemented;
- the predicted flood impacts resulting from the development are minor, difficult to avoid, and temporary. Mitigation measures have been incorporated in the proposal such as a minimum floor level, engineering to ensure structural integrity during a probable maximum flood and on-site stormwater management to minimise impacts of flooding;
- the proposed mitigation measures would effectively manage impacts from contamination and would have minimal disturbance to remediation works;
- additional traffic generated would provide a minor increase to the local traffic network;
- the facility would provide a range of environmental and economic benefits for the region, through resource recovery and provision of long-term operational jobs; and
- the facility is consistent with the strategic direction for waste management in NSW

Consequently the Department considers that the development is in the public interest and should be approved subject to conditions.

7. RECOMMENDATION

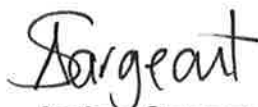
It is recommended the Planning Assessment Commission:

- **consider** the findings and recommendations of this report;
- **approve** the development application under section 89E of the EP&A Act; and
- **sign** the attached development consent (refer Appendix A).



Chris Ritchie
Director
Industry Assessments

6/6/16.



Anthea Sargeant
Executive Director
Key Sites and Industry Assessments

14/6/16