Preliminary Environmental Assessment Report

Development Overview

Proposed Increased Throughput at Existing Resource Recovery Facility- Wood/Plasterboard Recycling

25 Dunheved Circuit, St Marys

Revision History

Rev No.	Revision Date	Author / Position	Details	Authorised	
				Name / Position	Signature
0	12/05/2020	Sam Coles Development Planner	Draft	Mark Daniels Manager Planning & Development	
1		Sam Coles Development Planner	Final	Mark Daniels Manager Planning & Development	
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Executive Summary

The proposed site is identified as being 25 Dunheved Circuit, St Marys, Lot 143 in DP 1013185. An existing approved Resource Recovery Facility is currently located on site. The subject site is situated 45 kilometres (km) west of the Sydney central business district (CBD). The site is located within the City of Penrith Local Government Area (LGA), within the electoral district of Londonderry and the federal Division of Lindsay. The proposed site is located approximately 6.5 km from Penrith CBD.

The subject site is located within an established industrial precinct that covers an area of approximately 1,000 hectares (ha) and comprises a mix of general, light and storage based industries; including steel and sheet metal fabrication workshops, oil and lubricant storage facilities, transport depots, plant and equipment hire facilities and mechanical repair workshops. The industrial precinct also has several existing waste management and resource recovery facilities and other similar activities licensed under the Protection of the Environment Operations Act 1997 (POEO Act).

25 Dunheved Circuit was included in a previous SSD application (SSD-8200), along with the adjoining property at 21 Dunheved Circuit, that was approved by DoPI on the 6/11/2018. The approval allowed the site to be used a resource recovery facility with a throughput of 350,000 tonnes per annum of non-putrescible waste. This approval has since recently been surrendered.

The proposal is for the increase of throughput/volume of waste to the existing Resource Recovery Facility at 25 Dunheved Circuit. The site currently has approval for the sorting and processing of 18,000 tonnes of waste per annum (DA01/1034 Penrith Council). It is proposed to increase this throughput to 150,000 tonnes per annum, consisting of 110,000 tonnes wood/timber waste and 30,000 tonnes of plasterboard. As a result of processing the timber materials, a minor amount of waste metals (10,000 tonnes) will be collected on site and transferred elsewhere for processing. Importantly, please note that no works are proposed to the existing site or buildings on the site.

Processing of timber and wood waste and plasterboard will happen in the existing building by way of compaction and shredding/grinding. The majority of the processed wood waste will be transferred to the Borg Manufacturing site in Oberon, NSW to be used in the manufacture of particle board and MDF products, or to be used as fuel for dryers. The typical types of wood waste include clean pallets, unlaminated particle board, MDF, LOSP pine and laminated MDF with coatings, along with other urban and raw wood materials deemed suitable. These waste materials will come from a number of sources including Borg Panels customers, framing and truss builders, freight companies and other timber companies.

Plasterboard will be minimised and grinded, with paper removed during the grinding process. The gypsum generated by processing will be supplied to others for likely use in agricultural soil conditioning or re-used in plasterboard production.

Waste metals recovered during the timber processing will be manually sorted and separated, and then taken off-site to other waste facilities to be processed or disposed of.

The Proposal would be considered SSD under Clause 23 (waste and resource management facilities) of *Schedule 1 of the State Environmental Planning Policy (State and Regional Development) 2011*, which refers to:

(3) Development for the purpose of resource recovery or recycling activities that handle more than 100,000 tonnes per year of waste

The relevant local planning instrument is the *Penrith Local Environmental Plan 2010*. The Proposal site is zoned IN1 General Industrial under *Penrith Local Environment Plan* (LEP) 2010. A "resource recovery facility" is prohibited under the Penrith LEP 2010. However, *Clause 121 of State Environmental Planning Policy (Infrastructure) 2007* (ISEPP) permits the development of a resource recovery facility on land in a prescribed zone with development consent. Zone IN1 General Industrial is identified as a prescribed zone and consequently the proposed development would be permissible with development consent under the provisions of the ISEPP. The provisions of the ISEPP prevail over the Penrith LEP 2010 in this regard. As such, the proposed development is permissible with development consent.

A preliminary environmental assessment has been performed and is documented in this report to help inform the range of issues that will need to be considered in the EIS to ensure that human health and the environment are protected. The assessment has considered planning and legislative requirements, as well as site conditions, surface water management, groundwater, noise and air impacts, licences, adjoining premises, nearest sensitive receptors, traffic, social and cultural environment, stakeholder and community consultation.

As part of this assessment, we have also considered the strategic drivers, including the NSW State and Local Planning Policies. The preliminary environmental assessment has also considered the sustainability benefits of the project, including the environmental, economic and social benefits.

1 Introduction

1.1 Proposal

Borg Manufacturing Pty Ltd is proposing to increase the throughput/volume of the existing resource recovery and recycling facility at 25 Dunheved Circuit, St Marys, Lot 143 in DP 1013185.

The proposal is for the increase of throughput/volume of waste to the existing Resource Recovery Facility at 25 Dunheved Circuit. The site currently has approval for the sorting and processing of 18,000 tonnes of waste per annum (DA01/1034 Penrith Council). It is proposed to increase this throughput to 150,000 tonnes per annum, consisting of 110,000 tonnes wood/timber waste and 30,000 tonnes of plasterboard. As a result of processing the timber materials, a minor amount of waste metals (approx.10,000 tonnes) will also be collected on site and transferred elsewhere for processing. No works are proposed to the existing site or buildings. The existing site was purpose built for resource recovery.

Processing of timber and wood and plasterboard waste will happen in the existing building by way of compaction and shredding/grinding. The majority of the processed wood waste will be transferred to the Borg Manufacturing site in Oberon, NSW to be used in the manufacture of particle board and MDF products, or to be used as fuel for dryers. The typical types of wood waste include clean pallets, unlaminated particle board, MDF, LOSP pine and laminated MDF with coatings, along with other urban and raw wood materials deemed suitable. These waste materials will come from a number of sources including Borg Panels customers, framing and truss builders, freight companies and other timber companies.

Plasterboard will be minimised and grinded, with paper removed during the grinding process. The gypsum generated by processing will be used for agricultural soil conditioning or re-used in plasterboard production.

Waste metals, including those recovered during the timber processing will be manually sorted and separated, and then taken off-site to other waste facilities to be processed or disposed of.

The information within this Preliminary Environmental Assessment (PEA) has been provided to support a request for Secretary's Environmental Assessment Requirements (SEARs) to initiate the State Significant Development (SSD) approval process and the preparation of an Environmental Impact Statement (EIS)under Part 4 of the Environmental Planning and Assessment Act 1979 (EP&A Act). This document provides information regarding the applicant and the proposal, as well as outlining the scope of the proposed environmental impact assessment.

1.2 Proponent

Borg Manufacturing Pty Ltd is a leading Australian manufacturer of melamine panels and components for all joinery applications. Their manufactured products include a range of medium-density fibreboard (MDF), particle board, shelving and components. Borg Manufacturing operate three sites in NSW – Oberon, Charmhaven and Somersby.

The Charmhaven site is the leading manufacturer of cabinet doors in Australia, utilising world class production and manufacturing techniques.

In 2010, Borg purchased the former Carter Holt Harvey MDF facility in Oberon. Borg Manufacturing operate MDF and particle board manufacturing lines at the facility. The range of products manufactured at the facility include standard MDF, Moisture Resistant MDF, E0 (Low Formaldehyde Emitting) MDF and ultraprime MDF mouldings.

The two manufacturing sites are supported by a 25,000m^2 warehouse and distribution facility at Somersby, NSW.

Borg Manufacturing has continued to invest in leading edge, world class machinery across its three manufacturing sites, aiming to produce the highest quality product in the most cost-effective manufacturing processes. It has a commitment to sustainability and utilising best practice in all its operations.

Borgs commitment to improving environmental impacts has seen the introduction of processing of waste timbers to be blended with virgin wood to be used in the manufacture of particle board. This process will see a substantial decrease in the amount of wood and timber waste going to landfill in NSW.

1.3 Project Location

The proposed site is identified as being 25 Dunheved Circuit, St Marys, Lot 143 in DP 1013185. An existing approved Resource Recovery Facility is currently located on 25 Dunheved Circuit (the existing RRF). The subject site is situated 45 kilometres (km) west of the Sydney central business district (CBD). The site is located within the City of Penrith Local Government Area (LGA), within the electoral district of Londonderry and the federal Division of Lindsay. The proposed site is located approximately 6.5 km from Penrith CBD.

The Proposal site is located within an established industrial precinct that covers an area of approximately 1,000 hectares (ha) and comprises a mix of general, light and storage based industries; including steel and sheet metal fabrication workshops, oil and lubricant storage facilities, transport depots, plant and equipment hire facilities and mechanical repair workshops. The industrial precinct also has several existing waste management and resource recovery facilities and other similar activities licensed under the Protection of the Environment Operations Act 1997 (POEO Act).

The closest residential uses are located approximately 1.3km to the east and west of the site. These uses are physically separated by a large vegetated area surrounding Ropes Creek to the east of the site and a golf course bordering South Wianamatta Creek to the west of the site.

25 Dunheved Circuit was included in a previous SSD application (SSD-8200), along with the adjoining property at 21 Dunheved Circuit, that was approved by DoPIE on the 6/11/2018. The approval allowed the site to be used a resource recovery facility with a throughput of 350,000 tonnes per annum of non-putrescible waste. This approval has since recently been surrendered.

The figures below show the site location.

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Figure 1 Location Plan 25 Dunheved Circuit, St Marys. Google Earth

Figure 2 Aerial Photo of 25 Dunheved Circuit. Sixmaps

2 Existing Site

2.1 Site Description

The site is identified as 25 Dunheved Circuit, St Marys, being Lot 143 in DP 7013185. The site is an irregular shaped battle-axe lot with an area of 6,140m^2 and is zoned IN1 General Industrial. The land is predominantly flat, with vegetation on the site, all areas of the site are hardstand.

25 Dunheved Circuit

The lot contains:

- a 3,455m^2 waste processing building - constructed of concrete tilt panels and metal cladding with a ridge height of 11.9 m
- a site office and amenities building
- two inground 20m weighbridges
- external areas sealed with concrete hardstand
- water tanks

Photograph 1- Existing buildings on 25 Dunheved Circuit, St Marys

2.2 Surrounding Development

The site is located in the north-western portion of the Dunheved Business Park (DBP), St Marys. South Creek runs to the north-west and south-west of the site and flows in a north to south direction through the Wianamatta Regional Park. Approximately 800 m to the north-west is the residential area of Jordan Springs, which is currently under construction. Jordan Springs forms part of the St Marys Australian Defence Industries (ADI) site (Central precinct), as defined under Sydney REP 30-St Marys (SREP 30).

The site is located within an established industrial precinct with an area of approximately 1,000 ha and comprises a mix of general, light and storage-based industries, including steel and sheet metal fabrication workshops, oil and lubricant storage facilities, transport depots, plant and equipment hire facilities and mechanical repair workshops. The DBP also hosts several existing licensed waste management and resource recovery facilities.

The nearest residential receivers are located approximately 1.3 km to the east and 1.3 km west of the site in the suburbs of Ropes Crossing and Werrington County respectively. In the future, residents will also be located 800 m away at Jordan Springs. Current and future nearby residences are physically separated from the site by a large vegetated area surrounding Ropes Creek to the north-east, the Dunheved Golf Course bordering South/Wianamatta Creeks to the west and designated regional open space to the east.

The road network surrounding the site includes Dunheved Circuit, Links Road, Ropes Crossing Boulevard, Forrester Road and Christie Street. Access to the DBP is via a sole entrance/ exit at a roundabout at the junction of Forrester Road and Ropes Crossing Boulevard at the eastern side of the DBP Connection to Sydney's arterial road network, including the M4 and M7, is via Forrester Road and Glossop Street**).**

The figure below shows the surrounding land uses (Figure 3).

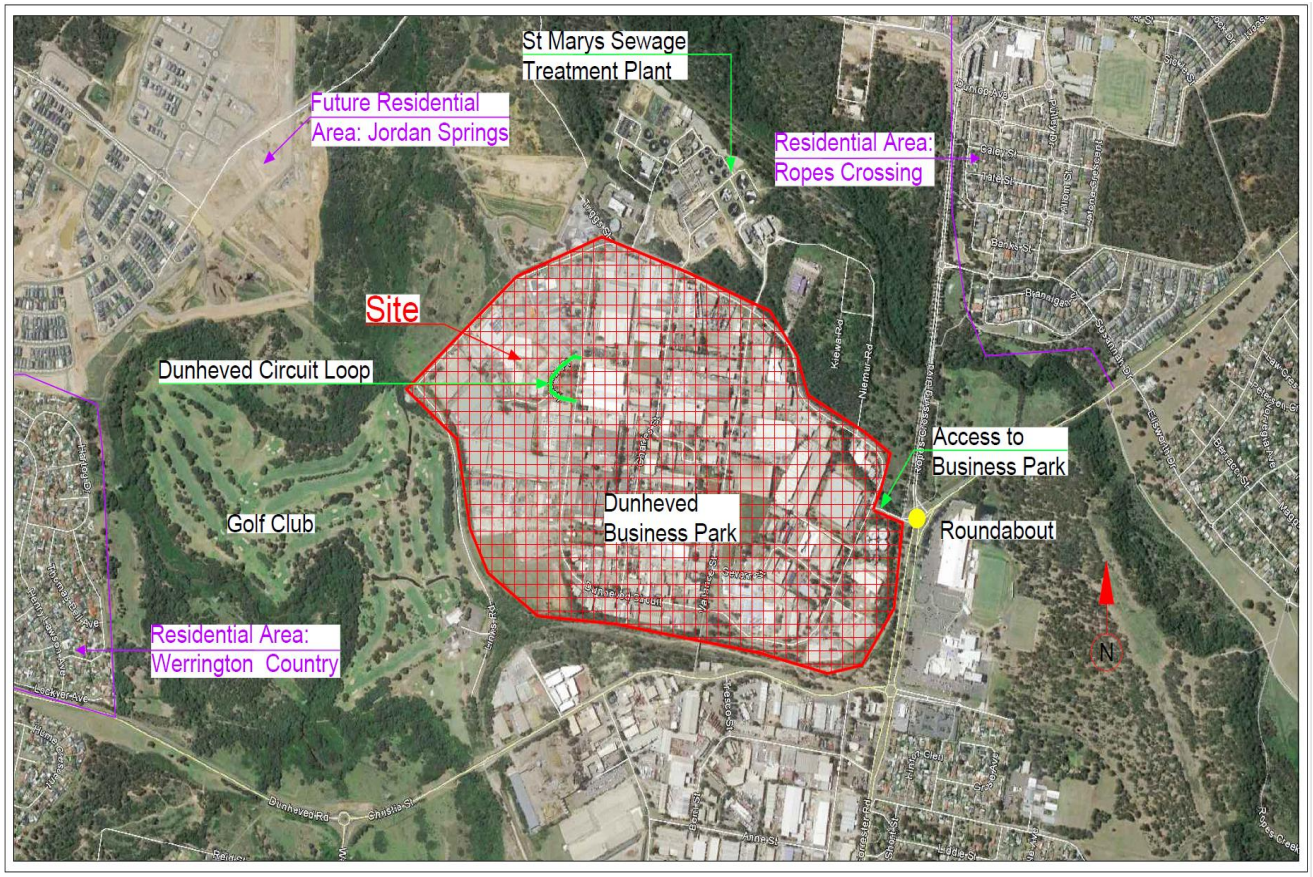

Figure 3 Surrounding Land Uses

2.3 Existing Approvals

The following development approvals currently relate to the site:

25 Dunheved Circuit

- Currently operates under a development consent granted by Penrith City Council (DA15/1042) on 20 June 2016. This consent permitted construction of a new processing building, office, weighbridges and vegetation removal. Construction of the new buildings and installation of new waste processing machinery was completed in April 2017. Condition 8 of DA15/1042 requires operations to be carried out in accordance with DA01/1034, which was the previous consent permitting a waste management and recycling facility receiving up to 18,000 tpa of general solid waste (non-putrescible).

- the previous operations were also regulated under an EPL issued by the Environment Protection Authority (EPA) (EPL 20627), which permitted resource recovery, waste processing and waste storage of listed non-putrescible wastes. No waste processing limit was listed on that EPL. That EPL has recently been surrendered.

- The site was subject to a previous SSD application (SSD-8200) that was approved by DoPIE on the 6/11/2018. The approval allowed the site to be used as a resource recovery facility with a throughput of 350,000 tonnes per annum of non-putrescible waste. The proposal also included the demolition of all buildings on 21 Dunheved Circuit and the extension of the existing shed on 25 Dunheved onto the adjoining

site, among other changes to the site. This approval has recently been surrendered in April 2020.

3 Project Description

3.1 Processing Capacity

The proposal is for the increase of throughput/volume of waste to the existing Resource Recovery Facility at 25 Dunheved Circuit. The site currently has approval for the sorting and processing of 18,000 tonnes of waste per annum (DA01/1034 Penrith Council). It is proposed to increase this throughput to 150,000 tonnes per annum, consisting of 110,000 tonnes wood/timber waste and 30,000 tonnes of plasterboard. As a result of processing the timber materials, a minor amount of waste metals (10,000 tonnes) will be collected on site and transferred elsewhere for processing. Please note that no physical works are proposed to the existing site or buildings.

Processing of timber and wood and plasterboard waste will happen inside the existing building by way of compaction and shredding/grinding. The majority of the processed wood waste will be transferred to the Borg Manufacturing site in Oberon, NSW to be used in the manufacture of particle board and MDF products, or to be used as fuel for dryers. The typical types of wood waste include clean pallets, unlaminated particle board, MDF, LOSP pine and laminated MDF with coatings, along with other urban and raw wood materials deemed suitable. These waste materials will come from a number of sources including Borg Panels customers, framing and truss builders, freight companies and other timber companies.

Plasterboard will be minimised and grinded, with paper removed during the grinding process. The gypsum generated by processing will be used for agricultural soil conditioning or re-used in plasterboard production.

Waste metals recovered during the timber processing will be manually sorted and separated, and then taken off-site to other waste facilities to be processed or disposed of.

All RRF activities (storage and processing) will be undertaken inside the existing building on 25 Dunheved Circuit.

3.2 Material Received

The proposed RRF will receive the following waste stream;

- 110,000 tonnes of Urban and Natural Wood wastes (MDF off-cuts, raw wood offcuts, clean pallets, LOSP pine, engineered wood products, particleboard, some laminated MDF with paint and plastic coatings);
- 30,000 tonnes of plasterboard waste, primarily offcuts and de-construction materials from construction sites.
- Minor amounts <10,000 tonnes of ferrous and non-ferrous metals. This will be made up of steel, and steel components removed from the processing of pallets i.e. nails, strapping etc. waste metals will be sorted and dispatched off-site

3.3 On-site Storage of Materials

Inside the building it is proposed to store up to 2000-2500 tonnes of both incoming waste timbers/plasterboard to be processed, and finished processed material. The maximum amount of stored material on-site at any one time will not exceed 5000 tonnes.

The materials will be stored in bunker areas inside of the building, with each stockpile less than 1000m^3 in size. The stockpiles will generally be 3-4m in height by 15-20m in length. There will be no external storage of materials.

3.4 Processing Activities

3.4.1 Plant and Equipment

The majority of plant and equipment to be utilised in the RRF would be similar to that used on site in the recent past with the operation of the previous RRF at 25 Dunheved Circuit (described in Section 2.3.2). The equipment to be utilised at this proposed RRF would include the following:

- Loaders and excavators (example pictures below Figures 4 &5).
- Two 20 metre weighbridges
- Industrial woodchipper/shredder/grinder
- Trommel

Figure 4 Typical front-end loader used to move materials.

Figure 5 Typical excavator used for moving and minimising timbers

3.4.2 Onsite Processing of Timber

The facility will receive suitable timber waste and used pallets for a variety of sources around Sydney and NSW. The waste receiving and inspection procedures will conform to the NSW EPA's Standards for managing construction waste in NSW. Loads will be inspected at the incoming weighbridge, as the incoming loads are being weighed. Incoming loads will be discharged in a dedicated waste unloading area, which will be on the concrete hardstand floor within the building. Any small quantities of non-conforming material that can easily be removed will be separated and set aside for later disposal. Highly contaminated loads will be re-loaded and removed from the site. Inspected and cleared waste will be transferred to a concrete bunker until ready for processing.

Generally, larger pieces of timber and board will be minimised using the teeth of the excavator, breaking boards and other timbers to a manageable size to enter the process. Material to be processed will be loaded from the waste storage bunkers into a hopper using an excavator. Suitable wood waste is then put through the shredder for size reduction. Dust control equipment will operate as part of the shredder. Importantly, all shredding and processing will occur within the building to control noise and air quality impacts on the surrounding areas. The shredder and trommel are mobile and will be moved into position to process the timber.

The shredder also contains magnets to capture any metals, mainly nails and bracing from pallets, that are then added to the metal sorting area. The shredded waste is discharged from the shredder onto another conveyor, into a trommel (Figure 6) which will separate the finer particles from the shredded material. From the trommel, suitable material is transferred to storage and dispatch areas.

Shredded wood waste is loaded onto transport vehicles for transfer to Borg's Oberon Panel board production plant for re-use in the manufacturing process. It will also be sold for animal bedding among other applications.

Figure 6 Typical Trommel used to separate different size of shredded materials.

3.4.3 Plasterboard processing

The facility will receive suitable plasterboard waste primarily consisting of offcuts and deconstruction materials from construction sites, the facility will not accept co-mingled demolition waste. The waste receiving and inspection procedures will conform to the NSW EPA's Standards for managing construction waste in NSW. Loads will be inspected at the incoming weighbridge, as the incoming loads are being weighed. Incoming loads will be discharged in a dedicated waste unloading area, which will be on the concrete hardstand floor within the building. Any small quantities of non-conforming material that can easily be removed will be separated and set aside for later disposal. Highly contaminated loads will be re-loaded and removed from the site. Inspected and cleared waste will be transferred to a concrete bunker until ready for processing.

Plasterboard will be minimised in the same way that timber waste will be, using the teeth of the excavator, it will then be placed in a specialty grinder that removes the paper from the plasterboard and reduces the plaster into gypsum. The paper will be removed off-site for further recycling. The gypsum will be provided to plasterboard manufacturers for re-use in new product or used in agricultural applications for soil conditioning.

3.4.4 Metals collection

A large portion of the metals will be extracted during the timber processing, and include nails, steel strapping, brackets which are removed during the minimisation process. Some small amounts of general waste steel and metal will be received onsite.

Metals including those removed during the timber processing will be placed into a metal collection bin and taken to a scrap metal recycling yard. Metal will be stored in a separate storage area in appropriately sized bins to be taken off site.

3.5 Site Layout

The figure 7 below outlines the proposed layout of machinery and storage areas inside of 25 Dunheved Circuit, along with the positioning of existing infrastructure. No new physical works are proposed on-site. All machinery is mobile and located within the existing building and is expected to have a minimal impact on adjoining premises, particularly given it is inside. The layout is shown in figure 7 below.

3.6 Hours of Operation and Staffing

It is proposed to operate the facility 24 hours a day, 7 days a week including processing, waste delivery and collection. This is consistent with the previous approval on-site under SSD-8200.

A modern waste recycling facility needs to be able to receive, process and despatch 24 hours per day, although for the majority of times, it can be expected that most operations would be carried out in daytime hours.

There will be up to 10 staff employed onsite in processing, stockpiling, receiving, dispatch and office related work.

3.7 Environmental Management and Licencing

The proposal will operate under an Environmental Management Plan (EMP) that will be updated as necessary to incorporate any key operational changes. It is expected that the EMP will include the following sections:

- Introduction
- Environmental Policy
- Organisational Structure
- Description of Activities
- Identification of Environmental Issues and Impacts
- Environmental Management
- Management Procedures
- Contingency Plans and Emergency Response
- Complaints Management
- Auditing and Reporting
- Continuous Improvement

As part of the development application process, Borg will apply for an Environmental Protection Licence (EPL) appropriate to the type and scale of operations from the NSW Environment Protection Authority.

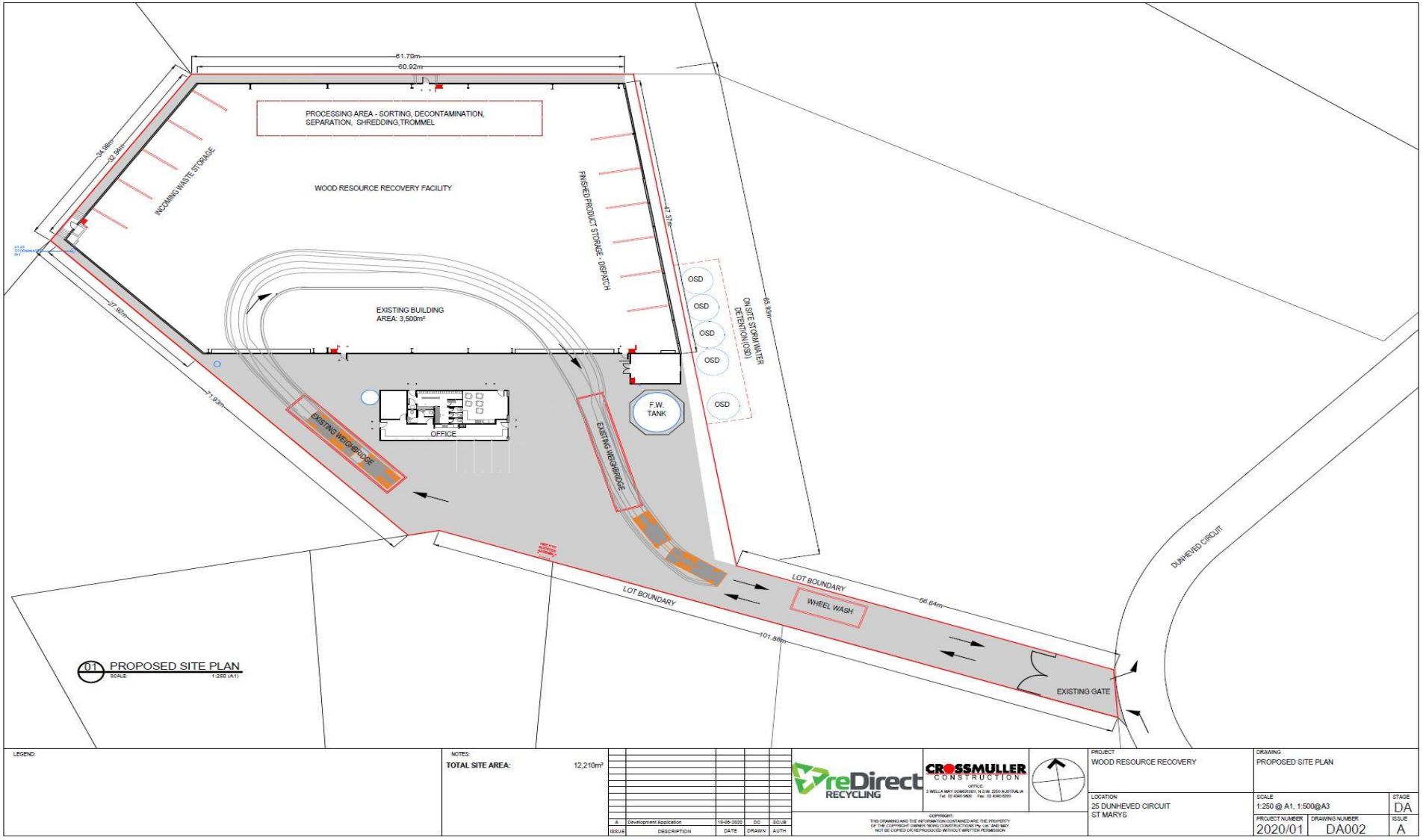

Figure 7 Proposed site layout- 25 Dunheved Circuit, St Marys

4 Planning and Statutory Consideration

This section identifies the relevant strategic and statutory planning provisions that apply to the proposed development.

4.1 State Legislation

4.1.1 Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EP&A Act) forms the statutory framework for environmental assessment and planning approval in NSW. The project is considered 'State Significant Development' (SSD) in accordance with Division 4.1 of Part 4 of the EP&A Act. Specifically, section 89C of the EP&A Act states the following:

> ***89C Development that is State significant development***
>
> *(1) For the purposes of this Act,* ***State significant development*** *is development that is declared under this section to be State significant development.*
>
> *(2) A State environmental planning policy may declare any development, or any class or description of development, to be State significant development.*

In accordance with s89C(2), the development is declared to be SSD as it is a type listed in Schedule 1 of the *State Environmental Planning Policy (SEPP) - State and Regional Development.* Namely;

> ***23 Waste and resource management facilities***
>
> *(3) Development for the purpose of resource recovery or recycling facilities that handle more than 100,000 tonnes per year of waste.*

Having triggered as SSD, the relevant consent authority is the Minister pursuant to s89D of the EP&A Act:

> ***89D Minister consent authority for State significant development***
>
> *(1) The Minister is the consent authority for State significant development.*
> ***Note.*** *Section 23 enables the Minister to delegate the consent authority function to the Planning Assessment Commission, the Secretary or to any other public authority.*

An important distinction for State Significant Development is the requirement of all applicants to apply to the Secretary of the Department of Planning and Environment for SEARs, prior to the preparation of an Environmental Impact Statement (EIS). The requirement for an EIS is specified by s78A (8A) of the EP&A Act. The EIS must comply with any SEARs issued, in addition to complying with the requirements of the EP&A Regulation.

4.1.2 Protection of the Environment Operations Act 1997

On determination of the project application, an application for an EPL will be lodged with the NSW Environment Protection Authority. As the proposal is subject to an environmental assessment under the EP&A Act, the EPA will not be required to invite or consider public submissions prior to the licence being approved.

4.1.3 Waste Avoidance and Resource Recovery Act 2001

The objects of the *NSW Waste Avoidance and Resource Recovery Act 2001* are to encourage efficient use of resources and reduce environmental harm. This is aimed to be achieved with the principles of ecologically sustainable development and considering resource management options against the hierarchy of avoid, reuse and dispose.

The proposed facility is consistent with these objectives by promoting a reduction of waste and facilitating waste re-use.

4.2 Relevant Environmental Planning Instruments

4.2.1 State Environmental Planning Policy (State and Regional Development 2011)

The project triggers SSD in accordance with Division 4.1 of Part 4 of the EP&A Act, as it is a type listed in Schedule 1 of the *State Environmental Planning Policy (State and Regional Development) 2011*. Pursuant to Clause 8 of the SEPP:

> ***8 Declaration of State significant development: section 89C***
>
> *(1) Development is declared to be State significant development for the purposes of the Act if:*
> *(a) the development on the land concerned is, by the operation of an environmental planning instrument, not permissible without development consent under Part 4 of the Act, and*
> *(b) the development is specified in Schedule 1 or 2.*

Specifically, Clause 23 of Schedule 1 lists *"Waste and Resource Management Facilities"* as SSD if the development triggers one of the six sub-clauses.

This proposal is triggered by sub-clause 3 as it is expected to process up to 150,000 tonnes of material per year:

> *3) Development for the purpose of resource recovery or recycling facilities that handle more than 100,000 tonnes per year of waste.*

Accordingly, the appropriate government approval process for the proposal is SSD under Part 4 of the EP&A Act.

4.2.2 State Environmental Planning Policy No. 55 – Remediation of Land

State Environmental Planning Policy No 55 (Remediation of Land) provides that a consent authority cannot grant development consent unless it has considered whether or not the land is contaminated.

Clause 7(2) states that where the proposed development will involve a "change of use" of certain land, the Minister may need to consider a preliminary investigation of the land conducted in accordance with the contaminated land planning guidelines. Clause 7(2) applies to land that has been used for any of the purposes listed in Table 1 of the contaminated land planning guidelines. Heavy industries such as Chemical Manufacture & Formulation, Oil Production & Storage, and Service Stations are land uses listed in Table 1. The application is not necessarily a "change of use" as it is continuing its approved use as a waste management and recycling facility. The proposal intends to increase the allowable

processing on-site and does not involve any physical works to the site. The proposal is consistent with the SEPP and no further assessment is required.

4.2.3 State Environmental Planning Policy No. 33 – Hazardous and Offensive Development

State Environmental Planning Policy 33 – Hazardous and Offensive Development (SEPP 33) provides definitions for hazardous and offensive industry based on the likely impacts of the proposal. A potentially hazardous industry is defined within SEPP 33 as "a development for the purpose of any industry which, if the development were to operate without employing any measures to reduce or minimise its impact, would pose a significant risk to human health, life or property, or to the biophysical environment".

The Hazardous and Offensive Development – Applying SEPP33 Guideline sets out a risk screening and threshold procedure to assist in determining whether a particular proposal exceeds specified threshold limits and falls within the definition of a "Potentially Hazardous Industry", and therefore whether SEPP 33 applies. A risk screening procedure to determine whether the proposal exceeds the risk threshold criteria will be considered as part of the EIS to determine whether a Preliminary Hazard Analysis is required.

4.2.4 State Environmental Planning Policy (Infrastructure) 2007

The aim of the *State Environmental Planning Policy (Infrastructure) 2007* is to facilitate the effective delivery of infrastructure across the State by improving regulatory certainty and efficiency through a consistent planning regime for infrastructure and the provision of services, and by providing greater flexibility in the location of infrastructure and service facilities.

Other key aims of the policy are to allow for the efficient development, redevelopment or disposal of surplus government owned land, and identify the environmental assessment category into which different types of infrastructure and services development fall (including identifying certain development of minimal environmental impact as exempt development). The policy also seeks to help proponents identify matters to be considered in the assessment of development adjacent to particular types of infrastructure development and providing for consultation with relevant public authorities about certain development during the assessment process or prior to development commencing.

The following waste and recycling facilities are covered under Section 120 of the *State Environmental Planning Policy (Infrastructure) 2007*:

- "Resource recovery facility" means a facility for the recovery of resources from waste, including such works or activities as separating and sorting, processing or treating the waste, composting, temporary storage, transfer or sale of recovered resources, energy generation from waste gases and water treatment, but not including re-manufacture of material or goods or disposal of the material by landfill or incineration.
- "Waste disposal facility" means a facility for the disposal of waste by landfill, incineration or other means, including associated works or activities such as recycling, resource recovery and other resource management activities, energy generation from waste gases, leachate management, odour control and the winning of extractive material to generate a void for disposal of waste or to cover waste after its disposal.

- "Waste or resource management facility" means a waste or resource transfer station, a resource recovery facility or a waste disposal facility.
- "Waste or resource transfer station" means a facility for the collection and transfer of waste material or resources, including the receipt, sorting, compacting, temporary storage and distribution of waste or resources and the loading or unloading of waste or resources onto or from road or rail transport.

Under Section 121 of the Policy, the following activities are permitted with consent:

- Development for waste or resource management facilities, other than development referred to below, may be carried out by any person with consent on land in a prescribed zone.
- Development for the purposes of a waste or resource transfer station may be carried out by any person with consent on land in a prescribed zone.

The policy defines 'prescribed zones' as being compatible with waste or resource recovery facilities:

- RU1 Primary Production
- RU2 Rural Landscape
- IN1 General Industrial
- IN3 Heavy Industrial
- SP1 Special Activities
- SP2 Infrastructure

As the recycling facility will process more than 30,000 tpa of waste wood and metal the proposed development meets the definition of a "Resource recovery facility" under Section 120 of the State Environmental Planning Policy (Infrastructure) 2007. Given the proposed development is to occur in a prescribed IN1 General Industrial zoning, the development is consistent with Section 120 of the State Environmental Planning Policy (Infrastructure) 2007, being development, which is permissible subject to development consent.

4.2.5 Sydney Regional Environmental Plan No 20— Hawkesbury-Nepean River

SREP 20 aims to protect the environment of the Hawkesbury-Nepean River System by ensuring that the impacts of future land uses are considered in a regional context. The Proposal site is not located within an area classified as having significance, however the St Marys Industrial precinct is located immediately adjacent to an area of Regional Significance. The Proposal site is located approximately 130 m from the boundary of the area identified as having Regional Significance.

4.2.6 Sydney Regional Environmental Plan No 30—St Marys

SREP 30 aims to provide a framework for sustainable development and management, including rezoning of and for urban and employment-generating development and for conservation purposes. The proposed use is consistent with the SREP.

4.2.7 Penrith Local Environmental Plan 2010

The Project is wholly located within the Penrith City Council (PCC) Local Government Area (LGA). The Penrith LEP 2010 governs land use within the PCC LGA.

The Project site is zoned IN1 General Industrial under the Penrith LEP 2010 identified in the Zoning Map shown below as Figure 5.

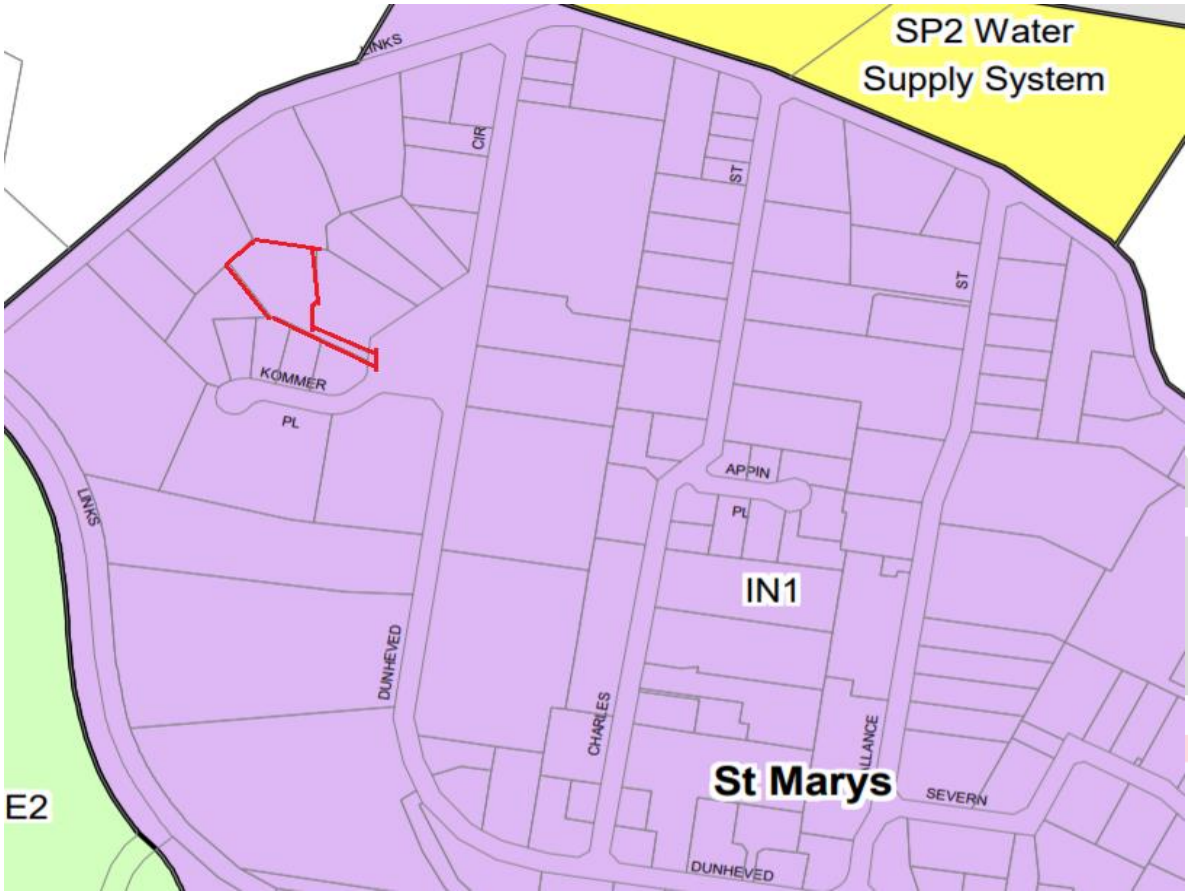

Figure 8 Land use zoning- IN1 General Industrial

The proposed development is consistent with the objectives of the IN1 General Industrial zone which are:

- To provide a wide range of industrial and warehouse land uses.
- To encourage employment opportunities.
- To minimise any adverse effect of industry on other land uses.
- To support and protect industrial land for industrial uses.
- To promote development that makes efficient use of industrial land.
- To permit facilities that serve the daily recreation and convenience needs of the people who work in the surrounding industrial area.

Whilst not being permissible under the PLEP 2010, the proposal is consistent with the objectives of the zone.

4.3 Commonwealth Legislation

4.3.1 Environment Protection and Biodiversity Conservation Act 1999

The primary objective of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) is to 'provide for the protection of the environment, especially those aspects of the environment that are Matters of National Environmental Significance'. Where there is potential for a proposal to have a significant impact on any Matter of National Environmental Significance, or it is unclear whether the proposal may have a significant impact, a Referral under the EPBC Act can be submitted to the Department of Environment for approval, concurrent with the State Significant Development process.

Given the existing site is highly disturbed and is majority hard stand area, and the subject development does not propose to remove any vegetation, and in the absence of other EPBC Matters of National Environmental Significance, this development is not considered to be a controlled action, therefore a referral is not required in this case.

4.4 Relevant Strategies

4.4.1 NSW Waste Avoidance and Resource Recovery Strategy 2014-21

The NSW Waste and Resource Recovery Strategy 2014–21 was released in December 2014. It sets clear directions for a range of priority areas over the next seven years and aligns with the NSW Government's waste reforms in NSW 2021: A plan to make NSW number one.

The strategy seeks to support investment in much-needed infrastructure, encourage innovation and improve recycling behaviour. The strategy also seeks to facilitate the development of new markets for recycled materials and reduce litter and illegal dumping. The strategy sets the following targets for 2021–22:

- avoiding and reducing the amount of waste generated per person in NSW
- increasing recycling rates to:
    - 70% for municipal solid waste
    - 70% for commercial and industrial waste
    - 80% for construction and demolition waste
- increasing waste diverted from landfill to 75%
- managing problem wastes better, establishing 86 drop-off facilities and services across NSW
- reducing litter, with 40% fewer items (compared to 2012) by 2017
- combatting illegal dumping, with 30% fewer incidents (compared to 2011) by 2017.

The new strategy provides a clear framework for waste management to 2021–22 and provides an opportunity for NSW to continue to increase recycling across all waste streams.

4.4.2 Fire and Rescue NSW Fire Safety in Waste Facilities

In August 2019, Fire and Rescue NSW released a Fire Safety Guideline, Fire Safety in Waste Facilities. The guideline applies to any waste facility within NSW involved in the storage, processing or resource recovery of combustible waste material.

The guidelines outline requirements and acceptable solutions for the building design, fire warning systems, firefighting equipment and storage of combustible material at waste facilities. These will be considered in the design of the waste recycling facility.

The existing building at 25 Dunheved Circuit will be checked for adequacy in regard to these requirements and upgraded to meet any fire standard that it currently does not comply with.

5 Environmental Risk Screening

An initial environmental risk screening assessment considered the likelihood and consequences of certain environmental outcomes, by assigning a semi-qualitative score to each of the identified environmental issues. This assessment highlighted that the following issues had the potential to cause unwarranted risk if left unmitigated, and accordingly are considered to be key issues for the EIS to consider:

- Dust
- Noise
- Surface water management;
- Traffic; and
- Socio-economics.

The risk assessment also guided certain issues that would not be key concerns for this particular proposal by reason of the locational context and the effectiveness of proposed environmental controls. These included vibration, heritage, flooding, biodiversity, visual amenity, soil and contamination.

The key and other issues are discussed further in Section 6.

The EIS will provide an environmental risk assessment that considers the nature and extent of environmental impacts both before and after the implementation of mitigation and control measures.

6 Key Environmental Issues

6.1 Air Quality

Appropriate control measures will be adopted to ensure that dust and particulate releases are minimised from the activities proposed and to ensure that dust deposition does not occur at a sensitive receptors.

The main source of dust at the site will be created by shredding of wood and plasterboard waste in the recycling facility. This operation will be conducted completely indoors, which will minimise the air quality impact on surrounding premises. Dust extraction will be used to capture dust at the source, being the shredder. Water sprays will also be used to suppress any dust. Shredded and grinded material will be stored indoors to limit any windblown dust escaping the site.

It should be noted that no putrescible waste will be accepted at the facility. Therefore, odour should not be a major issue at the site.

To assess the potential impacts of the proposal, a quantitative dust impact assessment will be prepared.

It is expected that the impact on air quality would be lesser than the previous approved SSD 8200 project on the site.

6.2 Noise

The main source of noise at the site will be shredding/grinding the wood/timber and plasterboard waste inside the existing recycling facility building. This operation will be conducted completely indoors, which will minimise the noise impact on surrounding premises.

Noise impacts of the operation will be modelled in accordance with the Industrial Noise Policy for day, evening and shoulder periods. Sleep disturbance potential will be specifically considered. Transport noise impacts will be considered in accordance with the Road Noise Policy.

This significant separation distance from the nearest residential receivers and the limited propensity of the proposed plant to generate ground transmitted vibration means that vibration from the facility would not be felt at the nearest residence.

It is expected that the acoustic impacts would be lesser than the previous approved SSD project on the site.

6.3 Surface Water

The proposed development will utilise the existing stormwater system on site. It will be checked for adequacy and updated if required.

25 Dunheved Circuit is currently considered totally impervious and is comprised of concrete pavements and roofed areas. Stormwater runoff from roofs and impervious pavements on 25 Dunheved Circuit drain to the stormwater drainage system, located in the western corner of the Proposal site.

The stormwater environment of the existing RRF is considered to be typical of the surrounding industrial environment.

6.4 Traffic

The facility's operation will require heavy vehicle traffic to the site. However, the location of the site and the nature of the surrounding businesses mean that the proposed facility is unlikely to have a negative impact due to traffic.

The proposal will be a reduction in vehicle movements compared to that approved under SSD 8200.

A traffic impact assessment will be prepared for the EIS.

6.5 Groundwater

Operation of the Proposal would not result in interaction with groundwater. No impacts to groundwater quality or flows are therefore anticipated as a result of the operation of the Proposal. No groundwater extraction is proposed. The site is impervious.

6.6 Biodiversity/Ecology

No vegetation communities are mapped within the Proposal site. It is not considered likely that any threatened fauna species, or habitat for threatened fauna species, are present within the Proposal site due to its longstanding history of industrial disturbance.

The proposal does involve any clearing of vegetation, and operational activities are not anticipated to impact any threatened flora species, populations or ecological communities listed.

A BDAR waiver will be applied for. Documentation is included at Appendix 1.

6.7 Socio-economic

The Proposal is situated within St Marys in the Penrith LGA in Sydney's West Subregion, and is surrounded by the suburbs of Ropes Crossing, Llandilo, Werrington Country and North St Marys.

Beneficial socio-economic impacts related to the operation of the proposal include the direct employment of up to 10 full-time personnel. The proposal will have indirect benefits on the wider regional area, including Borgs operations at Oberon and the Central Coast. The recycled waste wood is to be re-used predominantly in the manufacturing of particle board products at the Borgs Oberon Plant. The recycled timbers reduces Borgs reliance on plantation timbers, and reduces overall costs, which has the potential for increased outputs and flow on effects such as increased employment.

Operation of the Proposal will be within the existing enclosed shed with no impacts to the community. The remainder of the socio- economic impacts are considered to be negligible.

6.8 Aboriginal Heritage

The Proposal site is an established industrial site and is located within the boundaries of the Deerubbin Local Aboriginal Land Council (LALC) and was traditionally occupied by the Mulgoa Clan of the Dharug language group. No items or Aboriginal heritage significance have been identified within the vicinity of the Proposal site, and the Proposal site has not been identified by the Mulgoa or Dharug people as a site of Aboriginal heritage significance.

The previous SSD 8200 received the following comments from OEH in relation to the Aboriginal Heritage impacts.

"Thank you for forwarding this proposal to the Office of Environment and Heritage (OEH) for consideration. After reviewing the supporting EIS, OEH's Greater Sydney Planning Team has concluded that it does not entail any biodiversity, natural hazards or Aboriginal cultural heritage impacts that require a formal OEH response. We have no further need to be involved in the assessment of this proposal."

Please note that no physical works or changes to the site or buildings is proposed. It is therefore proposed to receive an ACHAR exemption given that the proposed facility will operate within the existing building on an existing industrial site. There will be no ground disturbance as a result of the proposed use.

We believe that no further reporting or assessment is relevant in this regard.

6.9 European Heritage

The Proposal site does not contain any registered items of heritage significance. Two identified items of heritage significance are located within one (1) km of the Proposal Site:

The Explosives Storehouse located at 146 Dunheved Circuit and the Dunheved Fire Station located at 50 Christie Street. The proposal will not alter or change the existing buildings or streetscape, and therefore the impact of the proposal on these sites is considered to be negligible, and no further reporting or assessment is relevant.

6.10 Consultation and Stakeholder Engagement

We are committed to undertaking best-practice stakeholder consultation and engagement activities with communities in which they operate. Key community, regulatory and industry stakeholders relevant to the Project have been identified. The applicant will be providing opportunities to stakeholders throughout the approval process to include input into the Project.

The main goals of the consultation will revolve around landowners/users in close proximity to the site. The closest residential receiver is located approximately 1.3km from the site

Table 1 Proposed Stakeholder Engagement

STAKEHOLDER	DETAILS
Penrith City Council	Project Overview Meeting
Environment Protection Authority	Provision of a factsheet or letter

Office of Environment and Heritage	Provision of a factsheet or letter
Transport for NSW	Provision of a factsheet or letter
Adjacent Businesses	Provision of a factsheet or letter

7 Project Justification

Borg believes the proposed recycling and resource recovery facility will provide many benefits to businesses in the greater Sydney region, regional NSW and the surrounding community. The estimated capital cost to set up the operation within the existing facilities at 25 Dunheved Circuit will be approximately $2.5 million.

When fully operational, Borg will have 10 staff on roster, providing jobs for the local area. When considering the estimated turnover potential for the proposal, Borg believes that this could be up to around $10 Million per annum. However, the flow on effects from the re-use of processed waste materials in the manufacture of particle board will lead to improved environmental and economic outcomes. The re-use of waste timbers allows Borgs to move towards a circular economy that will generate jobs, increase the robustness of the economy, increase the accessibility of goods, maximise the value of resources and reduce waste going to landfill.

Re-using, recovering and recycling these valuable timber and gypsum materials keeps them in the productive economy for longer. The same applies to the small amounts of metal. This has the dual benefits of lowering demand for new resources and reducing the need to manage waste. Any waste going to landfill is not only a loss of valuable resources, it also shortens landfill lifespans.

The proposed facility will further assist the NSW government to achieve its stated goals to increase the diversion of waste from landfill disposal through the development of strategic infrastructure and processing opportunities.

8 Conclusion

The Proposal, which is classified as State Significant Development in accordance with Clause 23(3) of the State Environmental Planning Policy (State and Regional Development) 2011, will be subject to an Environmental Impact Statement in accordance with the Environmental Planning and Assessment Act 1979, Environmental Planning and Assessment Regulations 2000 and once SEARS have been gained.

A preliminary environmental assessment has been performed and is documented in this report to help inform the range of issues that will need to be considered in the EIS to ensure that human health and the environment are protected. The assessment has considered planning and legislative requirements, as well as existing site conditions, surface water management, groundwater, licences, surrounding land uses, nearest sensitive receptors, traffic, social and cultural environment, heritage noise and air quality impacts.

These factors and other issues raised by the Department of Planning, Industry and Environment and other regulatory authorities will be considered in the Environmental Impact Statement to ensure that the proposed development is carried out to protect human health and the environment.

APPENDIX 1- BDAR WAIVER DOCUMENTATION