JACKSON
ENVIRONMENT AND PLANNING
STRATEGY | INFRASTRUCTURE | COMPLIANCE | PROCUREMENT

ReDirect Recycling Pty Ltd Somersby Resource Recovery Facility- SEAR's Preliminary Environmental Assessment Report

Jackson Environment and Planning Pty Ltd
Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060
T: 02 8056 1849 | E: admin@jacksonenvironment.com.au
W: www.jacksonenvironment.com.au

This Scoping Report has been prepared by Jackson Environment and Planning Pty Ltd, Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060.

Author 1: Dr Mark Jackson, Director and Principal Consultant, B.Sc (Hons), PhD, Grad. Cert. Mgmt., Exec. Masters Public Admin.

Author 2: Rylan Loemker, Senior Consultant, BEnvSc (Hons), GradDipBusTech

We declare that:
The statement contains all available information that is relevant to the environmental assessment of the development, activity or infrastructure to which the statement relates, and the information contained in the statement is neither false nor misleading.

Report version	Authors	Date	Reviewer	Approved for issue	Date
v1.0	R. Loemker	06/01/2021	Dr M.Jackson	Dr M.Jackson	07/02/2021
FINAL					

Executive summary

This Preliminary Environmental Assessment has been prepared for a proposed Resource Recovery Facility located at 33 Pile Road, Somersby (Lot 1 DP 1093201 and Lot 5 DP 1151970). The proponent is ReDirect Recycling Pty Ltd.

The proposed development will include the operation of a best practice Resource Recovery Facility within a previously approved warehouse building (with minor modifications). The facility will include a fully enclosed and integrated Resource Recovery Facility with a proposed maximum processing capacity of 99,000 tonnes per annum of principally non-putrescible materials.

The development will serve the recycling needs of the Central Coast community, which currently rely on council operated waste disposal facilities, with limited facilities for recycling of building and commercial waste materials.

The warehouse building for the proposed development was approved on 16th December 2019 by Central Coast Council under DA56372/2019. The proposed development will see modifications of the approved warehouse facility and its change of use into a fully integrated resource recovery facility.

As discussed in this report, under Schedule 3, Clause 32(1)(b)(iii) of *the Environmental Planning and Assessment Regulation* 2000, the proposed development will be classified as Designated Development. As a result, an EIS will be required as part of the development application and planning approval for the development. The planning consent authority for the development will be the Hunter and Central Coast Regional Planning Panel.

Before the EIS is prepared, the proponent needs to conduct a 'Preliminary Environmental Assessment' of the project (this report) and request the Secretary's Environmental Assessment Requirements (SEAR's) from the NSW Department of Planning and Environment (DPE). This is a requirement under Section 5.18 of the *Environmental Planning and Assessment Act* 1979.

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. This has been undertaken in accordance with the Department of Planning and Environment (2017) *Scoping an Environmental Impact Statement - Draft Environmental Impact Assessment Guidance Series*. The assessment has considered planning and legislative requirements, as well as site conditions, topography, geology and soils, surface water management, groundwater, easements, licences and covenants, adjoining premises, nearest sensitive receptors, traffic, social and cultural environment, visual catchment, stakeholder and community consultation, and a stakeholder consultation strategy.

As part of this assessment, we have also considered the strategic drivers, including 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.

The preliminary environmental assessment found that the consideration will need to be given to neighbouring businesses, and an increase in the number of vehicles entering the site must be carefully considered to avoid any impact on neighbours or on the local road network. However, impacts on noise, air quality and emissions to water are expected to be minimised by maintaining operations within the fully enclosed warehouse environment.

These factors and other issues raised by the NSW Department of Planning, Industry, and Environment and other regulatory authorities should be considered in the Environmental Impact Statement to ensure that the proposed upgrades are carried out to protect human health and the environment, while supporting the development of important recycling infrastructure for the region.

The development is also considered to be an Integrated Development, requiring a licence from the NSW EPA under Schedule 1 of the *Protection of the Environment Operations Act* 1997.

CONTENTS

1. Introduction

1.1 Overview

This Preliminary Environmental Assessment (PEA) has been prepared for a proposed Resource Recovery Facility located at 33 Pile Road, Somersby NSW (Lot 1 DP 1093201 and Lot 5 DP 1151970).

ReDirect Recycling Pty Ltd propose to operate a best practice Resource Recovery Facility within the new warehouse building that was approved under DA56372/2019, at 33 Pile Road, Somersby. The facility will have a maximum processing capacity of 99,000 tonnes per annum for processing principally non-putrescible materials.

To ensure that the development complies with contemporary standards for waste and transfer stations, a number of site upgrades are proposed as part of the development application. These include:

- Installation of a misting system within the warehouse building to suppress dust during tipping, sorting, and loading of waste materials for off-site recycling;
- Allocation of a dedicated tip and spread bay for verifying that waste materials do not contain contaminants as per the EPA's Standards for Managing Construction Waste in NSW;
- 13 separate waste storage bays to store sorted waste prior to being loaded onto trucks for off-site recycling;
- Two 27m in-ground weighbridges to be located on the southern side of the warehouse building for measuring the quantity of waste entering and leaving the facility to ensure the site complies with Clause 36 of the *Protection of the Environment Operations (Waste) Regulation* 2014;
- Site office, lunchroom, and amenities in the southwestern corner of the warehouse for waste sorting staff and truck drivers;
- A wheel wash for trucks exiting the warehouse building after tipping to clean wheel before exiting onto the public road; and
- Additional landscaping to the front of the premises.

The facility will accept mixed construction and demolition waste and source-separated waste from construction sites and commercial sites throughout the region.

Under Schedule 3, Clause 32(1)(b)(iii) of the *Environmental Planning and Assessment Regulation* 2000, Waste Management Facilities or Works that sort, process, recycle, recover, use or reuse material from waste are considered Designated Development and require an Environmental Impact Statement if they:

> *'have an intended handling capacity of more than 30,000 tonnes per year of waste such as glass, plastic, paper, wood, metal, rubber or building demolition material.'*

In total the Somersby Resource Recovery Facility will provide capacity for recycling up to 99,000 tonnes of material from the Central Coast per year. As a result, the proposed facility will be considered designated development under Schedule 3 of the *Environmental Planning and Assessment Regulation* 2000, and an EIS will be required as part of the development application and planning approval for the development.

The development is also considered to be an Integrated Development, requiring a licence from the NSW EPA under Schedule 1 Clause 34(1) of the *Protection of the Environment Operations Act* 1997. It is also noted that that a weighbridge will be required pursuant to Section 36 of the *Protection of the Environment Operations (Waste) Regulation* 2014.

The proponent for this project is ReDirect Recycling Pty Ltd, which is part of the Borg group of companies. The Borg business model supports sustainable practices and employs over 2,000 people nationwide. ReDirect Recycling conduct waste management from collection and transport to treatment of material with the aim of producing new products from old resources and return them to the market.

The company is committed to complying with all laws that affect its operations and understands that development approval and appropriate licensing is required prior to the proposed development occurring. The proponent seeks the Secretary's Environmental Assessment Requirements (SEARs) with respect to the proposed Environmental Impact Statement.

1.2 Purpose of the report

The aim of this PEA is to provide the NSW Department of Planning, Industry and Environment (DPIE) with information about the development of the Somersby Resource Recovery Facility, with respect to the necessary Environmental Impact Statement.

Pursuant to Part 2, Schedule 2 of the *Environmental Planning and Assessment Regulation* 2000, '*…before preparing an environmental impact statement, the responsible person must make a written application to the Director-General* (now the Secretary) *for the environmental assessment requirements with respect to the proposed statement.'*

The investigation has been undertaken in accordance with the Department of Planning and Environment (2017) *Scoping an Environmental Impact Statement - Draft Environmental Impact Assessment Guidance Series*.

1.3 The Proponent

ReDirect Recycling Pty Ltd is a new Australian company established to help fast track the transition to a Circular Economy in New South Wales. The company is focused on developing and operating integrated resource recovery centres to recover materials that can be used in advanced manufacturing. This includes materials from the household, commercial and construction waste streams. A focus of the company is to create high value manufactured products from raw materials that can be recovered from the urban waste stream.

ReDirect Recycling Pty Ltd is part of the Borg Group. Borg manufacturers timber products and particleboard. ReDirect Recycling Pty Ltd was established to utilise waste wood products and to provide a secure supply of wood to Borg Manufacturing.

ReDirect Wood Recycling conducts waste management from collection and transport to treatment of pallets, mixed clean timber, and particleboard offcuts. The overall goal is to produce new resources and return them to the market, creating a circular process. Meanwhile, ReDirect Metal Recycling collect, and sort metals recovered from construction and manufacturing sites. ReDirect Metal Recycling highlights the importance of investment in infrastructure for the collection and processing of recycled material.

ReDirect Recycling Pty Ltd offers a solution to combat the rising challenges of modern recycling, and the considerable pressure placed on the recycling sector in Australia due to lack of sustainable infrastructure.

1.4 Site description

The proposed facility is to be located at 33 Pile Road, Somersby within the Central Coast Council local government area (Figure 1.1). The site is located over two lots, Lot 1 DP 1093201 and Lot 5 DP 1151970, Somersby NSW.

The proposed development is located in the Somersby Industrial Park, which is located on the Somersby Plateau section of the Hunter Range on the Central Coast of New South Wales. The Somersby Industrial Park contains approximately 300 hectares of land zoned for industrial purposes and is bisected by the Sydney-Newcastle M1 Pacific Motorway. The Somersby Industrial Park is located 5.7 kilometres west of Gosford and 76 kilometres north of Sydney.

An aerial view of the immediately surrounding area is shown in Figure 1.2, and a view of the entire lot is shown in Figure 1.3.

The lot has an area of 4,608m^2 and is located on IN1 General Industrial zoned land under the *Gosford Local Environmental Plan* 2014 (Figure 1.4).

1.5 History of approvals

The site has development approval under DA51047/2016 for the following works:

- Consolidation of Lot 1 DP1093201, Lot 51 DP1151970 and part Lot 1 DP1194897 into one lot;
- Earthworks including extensive cut to maintain consistent floor levels across Borg and adjacent properties;
- Removal of 41 trees;
- Relocation of the existing stormwater and sewer easement to allow it to run continuously across the northern boundary of the consolidated site;
- Construction of a mechanics workshop;
- Construction of a truck wash including installation of a relocatable fuel tank and bowser;
- Construction of a materials handling shed;
- Construction of hardstand areas;
- Landscaping; and
- Operation of the site 24 hours a day, 7 days a week.

Approval for this development was granted by Central Coast Council on the 21st July 2017. The construction certificate for the approved development (DA51047/2016) was issued on the 27th November 2017. Between November 2017 and April 2019, the site has been cleared in accordance with the approved plans, and bulk earthworks have been carried out. As a result of the works carried out, there is no vegetation on the site, and the site has been manipulated to the required ground levels.

In April 2019, DA56372/2019 (contained in Appendix 1) was lodged with Central Coast Council which sought approval for the construction of a new building containing a large warehouse on the upper level with an industrial unit on the lower level and the repositioning of the mechanic's workshop. The approved truck wash was also be incorporated into the new workshop. The approved above ground diesel tank and fuel bowser was repositioned to the western end of the site. Approval for this development was granted by Central Coast Council on the 16th December 2019.

Figure 1.5 shows the approved site layout. Full details are provided in Appendix 2.

Figure 1.1. Aerial view of the nearby region. Approximate site boundaries are shown in yellow.

Date	Revision	Drawn By	Site description	Jackson Environment and Planning Pty Ltd	Client	ReDirect Recycling Pty Ltd
17/11/20	Revision A	R. Loemker	33 Pile Road, Somersby (Lot 1 DP 1093201, Lot 5 DP 1151970)	Strategy | Infrastructure | Compliance | Procurement A: Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060 E: admin@jacksonenvironment.com.au T: 02 8056 1849 W: http://www.jacksonenvironment.com.au	Project	Somersby Resource Recovery Facility
					Title	Aerial photo of site – region
					Scale	Not to Scale
					Source	Nearmap

Figure 1.2. Aerial view of the site and surrounding area. Approximate site boundaries are shown in yellow.

Date	Revision	Drawn By	Site description	Jackson Environment and Planning Pty Ltd		Client	ReDirect Recycling Pty Ltd
17/11/20	Revision A	R. Loemker	33 Pile Road, Somersby (Lot 1 DP 1093201, Lot 5 DP 1151970)	Strategy | Infrastructure | Compliance | Procurement A: Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060 E: admin@jacksonenvironment.com.au T: 02 8056 1849 W: http://www.jacksonenvironment.com.au		Project	Somersby Resource Recovery Facility
						Title	Aerial photo of site – surrounds
						Scale	Not to Scale
						Source	Nearmap

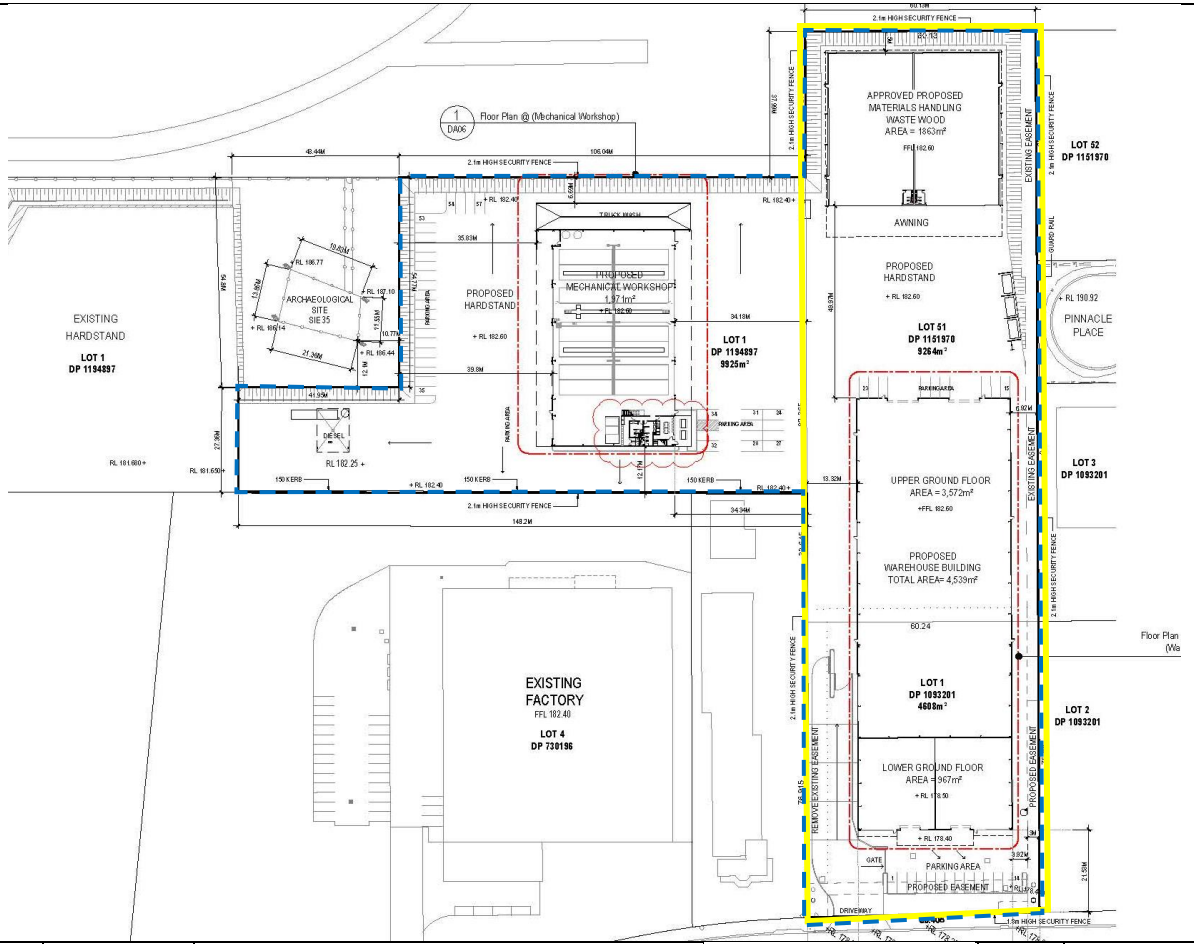
Figure 1.3. Close up aerial view of the lot, 33 Pile Road, Somersby. Approximate site boundaries are shown in yellow.

Date	Revision	Drawn By	Site description	Jackson Environment and Planning Pty Ltd Strategy | Infrastructure | Compliance | Procurement A: Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060 E: admin@jacksonenvironment.com.au T: 02 8056 1849 W: http://www.jacksonenvironment.com.au		Client	ReDirect Recycling Pty Ltd
17/11/20	Revision A	R. Loemker	33 Pile Road, Somersby (Lot 1 DP 1093201, Lot 5 DP 1151970)			Project	Somersby Resource Recovery Facility
						Title	Aerial photo of site
						Scale	Not to Scale
						Source	Nearmap

Figure 1.4. Land use zoning of the subject site (B5 Business Development). Approximate site boundaries are shown in yellow.

Date	Revision	Drawn By	Site description	Jackson Environment and Planning Pty Ltd Strategy | Infrastructure | Compliance | Procurement A: Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060 E: admin@jacksonenvironment.com.au T: 02 8056 1849 W: http://www.jacksonenvironment.com.au		Client	ReDirect Recycling Pty Ltd
17/11/20	Revision A	R. Loemker	33 Pile Road, Somersby (Lot 1 DP 1093201, Lot 5 DP 1151970)		Project	Somersby Resource Recovery Facility
					Title	Site Zoning
					Scale	Not to Scale
					Source	Department of Planning, Industry and Environment

Figure 1.5. Site layout as approved under DA56372/2019 (dashed blue outline). The approximate site boundaries for this development application are shown in yellow.



Date	Revision	Drawn By	Site description	Jackson Environment and Planning Pty Ltd		Client	ReDirect Recycling Pty Ltd
23/12/20	Revision A	R. Loemker	33 Pile Road, Somersby (Lot 1 DP 1093201, Lot 5 DP 1151970)	Strategy | Infrastructure | Compliance | Procurement A: Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060 E: admin@jacksonenvironment.com.au T: 02 8056 1849 W: http://www.jacksonenvironment.com.au	JACKSON ENVIRONMENT AND PLANNING STRATEGY | INFRASTRUCTURE | COMPLIANCE | PROCUREMENT	Project	Somersby Resource Recovery Facility
						Title	Approved Site Layout
						Scale	Not to Scale
						Source	Borg Construction

2. Written and physical description of the project

2.1 Overview of proposed development

ReDirect Recycling Pty Ltd propose to operate a best practice Resource Recovery Facility within the new warehouse building that was approved under DA56372/2019, at 33 Pile Road, Somersby (Lot 1 DP 1093201 and Lot 5 DP 1151970). The facility will have a maximum processing capacity of 99,000 tonnes per annum for processing principally non-putrescible materials.

To ensure that the development complies with contemporary standards for waste and transfer stations, a number of site upgrades are proposed as part of the development application. These include:

- Installation of a misting system within the warehouse building to suppress dust during tipping, sorting, and loading of waste materials for off-site recycling;
- Allocation of a dedicated tip and spread bay for verifying that waste materials do not contain contaminants as per the EPA's Standards for Managing Construction Waste in NSW;
- 13 separate waste storage bays to store sorted waste prior to being loaded onto trucks for off-site recycling;
- Two 27m in-ground weighbridges to be located on the southern side of the warehouse building for measuring the quantity of waste entering and leaving the facility to ensure the site complies with Clause 36 of the Protection of the Environment Operations (Waste) Regulation 2014;
- Site office, lunchroom, and amenities in the southwestern corner of the warehouse for waste sorting staff and truck drivers;
- A wheel wash for trucks exiting the warehouse building after tipping to clean wheel before exiting onto the public road
- Additional landscaping to the front of the premises.

The facility will to accept mixed construction and demolition waste and source-separated waste from construction sites and commercial sites throughout the region.

The total waste received is expected to be 99,000 tonnes per year. A breakdown of the waste types is provided in Table 2.1. The amount of waste permitted expected to be on the premises at any one time is 1,005 tonnes which will be stored indoors.

Waste will be delivered to the site and separated waste will be removed from the site via 19m semi-trailers (walking floors) and truck and dogs combinations.

All vehicles will access the facility from Pile Road. Vehicles tipping waste are directed to proceed to the weighbridge (Inspection Point 1). Rejected loads and unwanted materials will be managed in accordance with the *Standards for Managing Construction Waste* in NSW (NSW EPA, 2018) and the *Waste Classification Guidelines* (NSW EPA, 2014).

Visitor vehicles not carrying waste or other materials do not proceed over the weighbridge, instead proceed to park in the visitor / staff car park at the front of the site.

Accepted waste will be tipped in the "tip and spread inspection area" (Inspection Point 2) which is a dedicated area located within the warehouse and after Inspection Point 1 (weighbridge). This area will be used solely for tipping, spreading, turning and inspecting each load of construction waste as required. Rejected loads and unwanted materials will be managed accordingly.

Inspected waste will then be moved to the primary waste sorting area and sorted via an excavator. waste materials will be separated and stored in sseparate, designated storage bays for each waste material will be accepted.

Processed and recovered products will be collected and transported as required for off-site recycling. Trucks and vehicles picking up product will enter via the main entrance, will pass over the weighbridge, and will manoeuvre through the warehouse through the designated warehouse entrance. Trucks will be loaded via front end loader, then will exit the warehouse in the front direction, through the wheel wash and pass over the outgoing weighbridge for assessing net weight of product transferred off site.

The residual fraction will be transported to other EPA licenced facilities for further processing / recycling. Any residual waste from this process will be sent to landfill.

Figure 2.1. provides a process flow chart for the operation of the tip and spread area.

The layout of the site is given in Figure 2.2. A detailed site plan is provided in Appendix 3.

Figure 2.1. Process flow chart for the operation of the tip and spread area.

2.2 Quantities of waste materials to be received and stored

This development application seeks consent for 1,005 tonnes at any one point in time and an annual receival limit of 99,000 tonnes per year. The proposed waste materials and quantities to be stored at the site are provided in Table 2.1.

The site does not accept waste from public drop off.

2.3 Waste materials not accepted

The following materials will not be accepted:

- Special waste (incl. asbestos);
- Hazardous waste; and
- General solid waste (putrescible).

2.4 Proposed operating hours

ReDirect Recycling Pty Ltd propose to operate from 7am to 6pm Monday to Friday, 7am to 12pm Saturday and closed on Sundays and public holidays.

2.5 Staffing

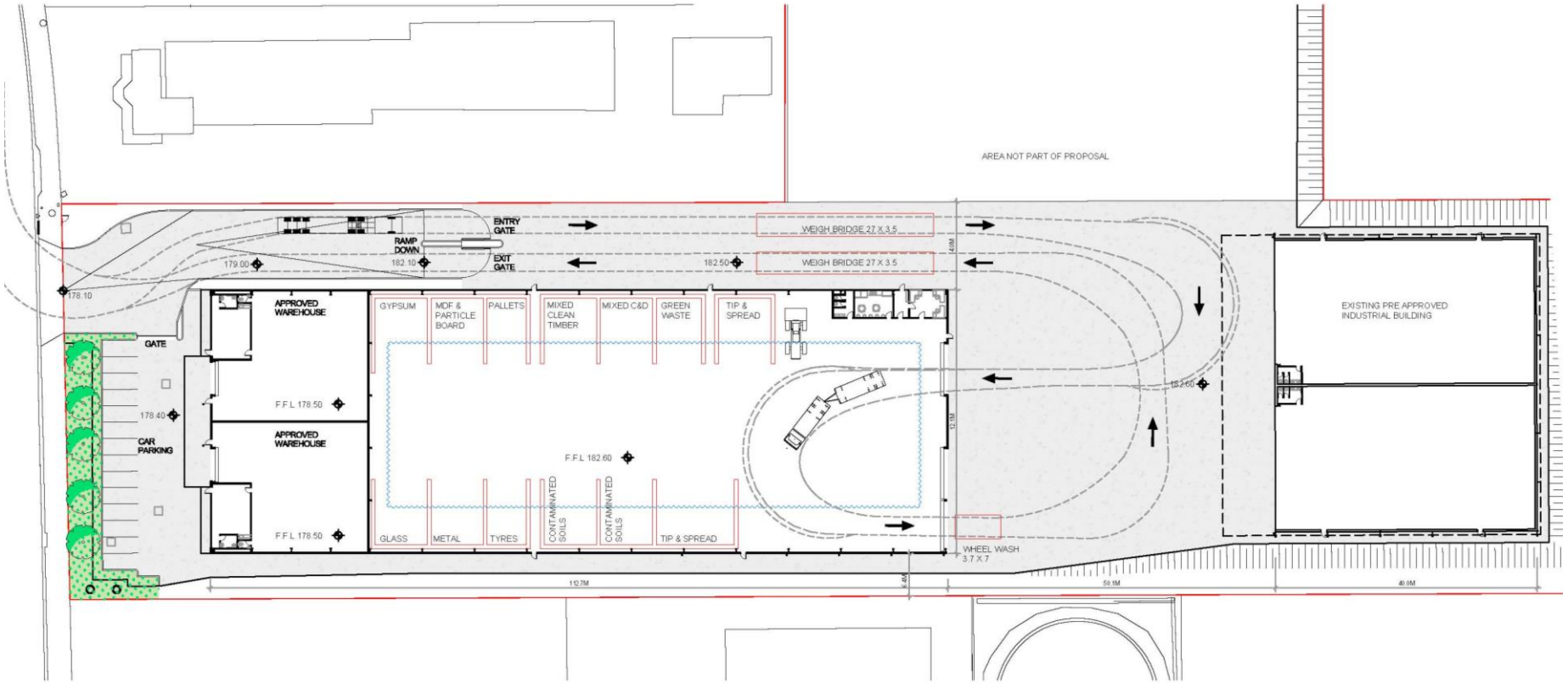
Up to 10 staff will be employed to work at the Resource Recovery Facility including administration staff, waste handling operators and truck drivers.

Table 2.1. Types and quantities of waste material to be stored at the Site (quantities are approximate).

Waste Type	Waste Composition (% by weight)	Annual Weight (tonnes)	Average Daily Weight (tonnes)	Density (tonnes/m^3)[1]	Total Storage Bay Volume (m^3)	Site Capacity (tonnes)
Mixed C&D waste	40%	40,000	108.5	0.83	204	169
Mixed clean timber	15%	15,000	67.8	0.36	204	73
Pallets	4%	4,000	8.1	0.16	140	22
MDF and particle board	2%	2,000	10.8	0.26	191	50
Green Waste	15%	15,000	16.3	0.45	166	74
Metals	5%	5,000	5.4	0.20	217	43
Gypsum	1%	1,000	5.4	0.17	204	35
Glass	1%	1,000	2.7	0.41	204	84
Tyres	4%	4,000	10.8	0.83	140	116
GSW CT1 (Recyclable)	10%	10,000	27.1	0.83	204	169
GSW CT2 (Restricted)	2%	2,000	8.1	0.83	204	169
TOTAL	**100**	**99,000**	**271**	-	**2,078**	**1,005**

[1] NSW Environment Protection Authority (2018). Waste Levy Guidelines. Table 4.1.

Figure 2.2. Proposed site layout and truck turning paths.



Date	Revision	Drawn By	Site description	Jackson Environment and Planning Pty Ltd		Client	ReDirect Recycling Pty Ltd
24/12/20	Revision A	R. Loemker	33 Pile Road, Somersby (Lot 1 DP 1093201, Lot 5 DP 1151970)	Strategy | Infrastructure | Compliance | Procurement A: Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060 E: admin@jacksonenvironment.com.au T: 02 8056 1849 W: http://www.jacksonenvironment.com.au		Project	Somersby Resource Recovery Facility
						Title	Proposed Site Layout
						Scale	Not to Scale
						Source	ReDirect Recycling Pty Ltd

3. Planning and legislative requirements

3.1 Project approval

The development of the new warehouse was approved on 16th December 2019 under DA56372/2019.

The proposed development will utilise the approved warehouse facility, with minor modifications and change of use into a fully integrated resource recovery facility.

The maximum waste processing capacity will be under 99,000 tonnes per annum. Under Section 4.33 of the *Environmental Planning and Assessment* Act 1979 the proposed development is considered to be a Designated Development, requiring an EIS to be submitted with the development application. In this regard, pursuant to Part 2, Schedule 2 of the *Environmental Planning and Assessment Regulation* 2000, ReDirect Recycling Pty Ltd seeks the Secretary's Environmental Assessment Requirements with respect to the proposed Environmental Impact Statement.

The planning consent authority for this proposed development will be the Hunter and Central Coast Regional Planning Panel.

3.2 Commonwealth and State legislative requirements

The relevant Commonwealth and State legislation includes:

- *Commonwealth Environment Protection and Biodiversity Conservation Act* 1999;
- *Environmental* Planning and Assessment Act 1979;
- *Environmental Planning* and Assessment Regulation 2000*;*
- *Protection of the Environment Operations Act* 1997*;*
- *Protection of the Environment Operations (Waste) Regulation* 2014;
- *Waste Avoidance and Resource Recovery Act* 2001;
- *Biodiversity Conservation Act* 2016;
- *Heritage Act* 1977; and
- *Roads Act* 1993.

3.2.1 *Commonwealth Environment Protection and Biodiversity Conservation Act 1999*

The Commonwealth *Environment Protection and Biodiversity Conservation Act* 1999 (EPBC Act) came into force from 16 July 2000. The EPBC Act requires actions which are likely to have a significant impact on matters of National Environmental Significance, or which have a significant impact on Commonwealth land, to be referred to the Commonwealth Minister for the Environment for approval.

The nine matters of National Environmental Significance protected under the EPBC Act are:

- World heritage properties;
- National heritage places;
- Wetlands of international importance (listed under the Ramsar Convention);
- Listed threatened species and ecological communities;
- Migratory species protected under international agreements;
- Commonwealth marine areas;

- The Great Barrier Reef Marine Park;
- Nuclear actions (including uranium mines); and
- A water resource, in relation to coal seam gas development and large coal mining development.

No National Environmental Significance matters would be impacted by the proposed development. This will be further addressed in the Environmental Impact Statement (EIS) for the proposed development.

3.2.2 *Environmental Planning and Assessment Act 1979*

The proposed development is consistent with the overall objectives of the *Environmental Planning and Assessment Act* 1979. Section 5 of the *Environmental Planning and Assessment Act* 1979 and the accompanying Regulation provide the framework for environmental planning in NSW and include provisions to ensure that proposals which have the potential to impact the environment are subject to detailed assessment, and to provide opportunity for public involvement.

The proposed development is consistent with the nominated objectives of the Act and is considered capable of fulfilling the statutory requirements. The site investigations have determined that the proposed development will not result in any significant negative impacts that cannot be adequately mitigated or managed. This will be assessed in detail at the development application stage.

The proposed project is considered to be a designated development requiring assessment under Part 4 of the *Environmental Planning and Assessment Act* 1979. The Hunter and Central Coast Joint Regional Planning Panel will be the approval authority for the development.

3.2.3 *Environmental Planning and Assessment Regulation 2000*

Under Schedule 3, Clause 32(1)(b)(iii) of the *Environmental Planning and Assessment Regulation* 2000, Waste Management Facilities or Works that sort, process, recycle, recover, use or reuse material from waste are considered Designated Development and require an Environmental Impact Statement if they:

> *'have an intended handling capacity of more than 30,000 tonnes per year of waste such as glass, plastic, paper, wood, metal, rubber or building demolition material.'*

In total, the Somersby Resource Recovery Facility will provide capacity for recycling up to 99,000 tonnes of material from the Central Coast. As a result, the proposed facility will be considered designated development under Schedule 3 of the *Environmental Planning and Assessment Regulation* 2000, and an EIS will be required as part of the development application and planning approval for the development.

As designated development, Clause 4.12(8) of the *Environmental Planning and Assessment Act* 1979 applies, and an Environmental Impact Statement in the form prescribed by the Regulations must accompany the development application:

> **4.12 Application**
>
> *(8) A development application for State significant development or designated development is to be accompanied by an environmental impact statement prepared by or on behalf of the applicant in the form prescribed by the regulations.*

It is noted that the proposed development is permitted with consent under Section 121 of the *State Environmental Planning Policy (Infrastructure)* 2007.

3.2.1 *Protection of the Environment Operations Act 1997*

The *Protection of the Environment Operation Act* 1997 (POEO Act) prohibits any person from causing pollution of waters, or air and provides penalties for air, water and noise pollution offences. Section 48 of the Act requires a person to obtain an Environment Protection License (EPL) from the NSW Environment Protection Authority before carrying out any of the premise-based activities described in Schedule 1 of the Act.

"Resource Recovery" (Clause 34) and "Waste Storage" (Clause 42) are defined as scheduled activities under Schedule 1 of the *Protection of the Environment Operations Act* 1997 as follows:

- Waste storage *means the receiving from off site and storing (including storage for transfer) of waste.* This activity is declared to be a scheduled activity if it meets the following criteria:

  "…If the premises are in the regulated area:

  (d) more than the following amounts of waste (other than waste referred to in paragraph (a) or (b)) is received per year from off site—

  (i) in the case of premises in the regulated area—6,000 tonnes…"

- Resource Recovery (of general waste) *means the receiving of waste (other than hazardous waste, restricted solid waste, liquid waste or special waste) from off site and its processing, otherwise than for the recovery of energy*. This activity is declared to be a scheduled activity if it meets the following criteria:

  "…if the premises are in the regulated area:

  (a) involves having on site at any time more than 1,000 tonnes or 1,000 cubic metres of waste,

  (b) involves processing more than 6,000 tonnes of waste per year."

As the proposed facility is located in the regulated area, will process more than 6,000 tonnes of waste per year, and have on site more than 1,000 tonnes of waste at any time, an Environment Protection Licence for the facility will be required from the NSW EPA.

3.2.2 *Protection of the Environment Operations (Waste) Regulation 2014*

During 2013-14, the NSW EPA carried out an extensive review and consultation process on NSW's waste regulatory framework. The result was the *Protection of the Environment Operations (Waste) Regulation* 2014 (the Waste Regulation).

The Waste Regulation improves the NSW EPA's ability to protect human health and the environment and paves the way for a modern and fair waste industry in NSW. The EPA rolled out the new rules stipulated under the Waste Regulation in stages over 2014-2017.

These changes include amended thresholds for environment protection licences and reforms to the waste levy system.

The Waste Regulation is supported by the Waste levy guidelines. These guidelines specify how to measure waste to calculate waste levy liability, the deductions waste operators can claim, and the EPA's requirements

for records, surveys and reports. All licensed processing, disposal, recycling and storage facilities within the metropolitan levy area or regional levy area are subject to the levy system.

Furthermore, scheduled waste facility in a levy-payable must ensure that there is a weighbridge installed at the facility.

ReDirect Recycling Pty Ltd propose to install two 27m in-ground weighbridges near the site entry for weighing the amount of waste entering and leaving the facility to ensure the site complies with Clause 36 of the *Waste Regulation* 2014.

3.2.3 *Waste Avoidance and Resource Recovery Act 2001*

This *Waste Avoidance and Resource Recovery Act* 2001 (WARR Act) underpins the NSW Government's *Waste Avoidance and Resource Recovery Strategy 2014 – 2021*, setting targets for recycling and reduction of litter in key priority area.

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; and
- 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.

The proposed development will commit to environmental sustainability, waste avoidance and reduction practices. The proposed development will also increase and expand recycling infrastructure on the Central Coast and will help meet the waste targets under the NSW Government's *Waste Avoidance and Resource Recovery Strategy 2014-2021.*

3.2.4 *Biodiversity Conservation Act 2016*

The *Biodiversity Conservation Act* 2016 provides the legislative framework for land management and biodiversity conservation. Biodiversity elements include major innovations to offsetting and private land conservation, as well as improvements to threatened species conservation and how we manage human-wildlife interactions.

The purpose of this Act is to maintain a healthy, productive and resilient environment for the greatest well-being of the community, now and into the future, consistent with the principles of ecologically sustainable development (described in section 6 (2) of the *Protection of the Environment Administration Act* 1991).

The site and surrounding areas have been subject to extensive disturbance from previous industrial uses. The site, and general locality is void of vegetation and no clearing is required as part of the proposed development. The site is not located in any areas identified as Terrestrial Biodiversity.

ReDirect Recycling Pty Ltd proposes to The Secretary (or delegate) that the requirement for a BDAR is waived. ReDirect Recycling Pty Ltd can demonstrate that the proposed development is not likely to have a significant impact on biodiversity values because:

- No clearing or removal of native vegetation is proposed as part of the development and thus the development will have negligible adverse impacts on threatened species or ecological communities, considering habitat suitability, abundance and occurrence, habitat connectivity, movement and water sustainability including consideration of any non-natural features, non-native vegetation and human-built structures.

3.2.5 *Heritage Act 1977*

The NSW *Heritage Act* 1977 (the Heritage Act) is the primary piece of State legislation affording protection to items of environmental heritage (natural and cultural) in New South Wales. Under the Heritage Act, 'items of environmental heritage' include places, buildings, works, relics, moveable objects and precincts identified as significant based on historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic values. State significant items are listed on the NSW State Heritage Register (SHR) and are given automatic protection under the Heritage Act against any activities that may damage an item or affect its heritage significance.

The Heritage Act also protects 'relics', which can include archaeological material, features and deposits. Section 4(1) of the Heritage Act (as amended 2009) defines 'relic' as follows:

> "*…relic means any deposit, artefact, object or material evidence that:*
>
> > *(a) relates to the settlement of the area that comprises New South Wales, not being Aboriginal settlement, and*
> >
> > *(b) is of State or local heritage significance*..."

Section 139(1) of the Heritage Act states that:

> "*…A person must not disturb or excavate any land knowingly or having reasonable cause to suspect that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, damaged or destroyed unless the disturbance or excavation is carried out in accordance with an excavation permit…*"

An archaeological site containing Aboriginal objects is located adjacent to the proposed development site, on Lot 1 DP1194897 (947 Old Pacific Highway). The existing buffer around the site is to be maintained which will provide adequate protection around the archaeological site and the proposed development will not impact it.

3.2.6 *Roads Act 1993*

The *Roads Act* 1993 provides for a number of issues including the establishment of procedures for opening and closing public roads, acquisition of land for roadways in addition to regulating the carrying out of various activities on public roads including roadwork and road widening operations.

It is expected that additional traffic generated by the proposed development will be well within the capacity of the existing roads. A qualified traffic engineer will be engaged to prepare a Traffic/Parking Impact Assessment Report for submission as part of the EIS.

The report will need to address the likely impact of intensified use of the site on the flow of traffic on Pile Road and the surrounding road network as well as on-site manoeuvring, truck volumes and any proposed parking arrangements. The report will need to demonstrate that sufficient car and truck parking have been provided on-site. Traffic management will be more thoroughly addressed in the EIS.

Provision of car parking spaces will need to be consistent with the *Gosford Development Control Plan* 2013.

No closure of public roads would be required in order to gain access to the Site during the demolition/construction and operation phases of the project. The proposed development does not seek to alter the access arrangements from the public roadway.

3.3 Environmental planning instruments and policies

3.3.1 *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.

Section 120 of the Policy defines waste or resource transfer stations as the following:

> '*waste or resource transfer station means a building or place used 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.*'

Resource recovery facility, waste disposal facility, waste or resource management facility and waste or resource transfer station have the same meanings as in the Standard Instrument.

Section 120 of the Policy also defines a prescribed zone as any of the following land use zones or a land use zone that is equivalent to any of these zones—

> *'(a) RU1 Primary Production;*
>
> *(b) RU2 Rural Landscape;*
>
> *(c) IN1 General Industrial;*
>
> *(d) IN3 Heavy Industrial;*
>
> *(e) SP1 Special Activities;*
>
> *(f) SP2 Infrastructure.'*

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

> *'2) Development for the purposes of a waste or resource transfer station may be carried out by any person with consent on:*
>
> *(a) land in a prescribed zone, or*
>
> *(b) land in any of the following land use zones or equivalent land use zones:*
>
> *(i) B5 Business Development;*
>
> *(ii) B6 Enterprise Corridor; and*

(iii) IN2 Light Industrial'

The proposed facility is permitted with consent, as the development is a considered a Resource recovery facility for the purposes of this policy and is located on an IN1 General Industrial land use zone.

3.3.2 *State Environmental Planning Policy No. 55: Remediation of Land*

Under *State Environmental Planning Policy, No. 55: Remediation of Land* (SEPP 55), applicants for consent must carry out a preliminary site investigation for any development consent sought on land previously used for activities that may cause contamination.

Specifically, Clause 7 of SEPP 55 requires the approval authority to have regard to certain matters before granting approval. These matters include:

- Whether the land is contaminated.
- Whether the land is, or would be, suitable for the purpose for which development is to be carried out.
- If remediation is required for the land to be suitable for the proposed purpose, whether the land will be remediated before the land is used for that purpose.

SEPP 55 also imposes obligations to carry out any remediation work in accordance with relevant guidelines, developed under the *Contaminated Lands Management Act* 1995 (discussed further below) and to notify the relevant council of certain matters in relation to any remediation work.

The contaminated land - record of notices is maintained by the NSW Office of Environment and Heritage in accordance with Part 5 of the *Contaminated Land Management Act* 1997 (CLM Act). A site will be on the register where site contamination is significant enough to warrant regulation and the NSW EPA has issued a notice under the CLM Act.

The search results indicated that, with regard to the Site, there are:

- No orders made under Part 3 of the Contaminated Land Management Act 1997 (CLM Act);
- No approved voluntary management proposals under the CLM Act that have not been fully carried out and where the approval of the Environment Protection Authority has not been revoked;
- No site audit statements provided under Section 53B of the CLM Act that relate to significantly contaminated land;
- No copies of anything formerly required to be part of the public record (where practicable); and
- No actions taken by the EPA under Section 35 or 36 of the Environmentally Hazardous Chemicals Act 1985.

A search of the NSW EPA public register of contaminated sites notified to NSW EPA under Section 60 of the CLM Act did not identify any records for the Site or any land adjacent to the Site.

As part of the approved development under DA51047/2016, the site will be fully sealed, thus protecting underlying soils from contamination for current and historic site activities. The proposed development works will involve only minor excavation of soil for installation of the weighbridges. Excavated soil will be tested and classified as per the NSW EPA's *Waste Classification Guidelines* (2014). Given the minor nature of works and the low risk of site contamination from existing site uses, further assessment under SEPP55 is not warranted.

3.3.3 *State Environmental Planning Policy No 33: Hazardous and Offensive Development*

State Environmental Planning Policy No 33: Hazardous and Offensive Development (SEPP 33) outlines the requirements for a Preliminary Hazard Analysis screening test, required to be undertaken for hazardous and potentially hazardous industries.

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.

Part 3 of SEPP 33 applies to:

(a) development for the purposes of a potentially hazardous industry, and
(b) development for the purposes of a potentially offensive industry, and
(c) development notified, for the purposes of this Part, by the Director in the Gazette as being a potentially hazardous or potentially offensive development.

An assessment of the proposed development in the Environmental Impact Statement will be undertaken in accordance with SEPP 33 to confirm the proposed development is not offensive or hazardous.

3.3.4 *State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017*

The *State Environmental Planning Policy (Vegetation in Non-Rural Areas)* 2017 ("Vegetation SEPP") commenced on 25 August 2017. The Vegetation SEPP is part of an extensive overhaul of native vegetation clearing laws in NSW and requires a Council permit to clear any vegetation below the Biodiversity Offset Scheme threshold, to which Part 3 of the Vegetation SEPP applies. The Vegetation SEPP applies to vegetation in 'non-rural' areas. Non-rural areas are defined as being land in the local government areas in metropolitan Sydney and Newcastle and land within a wide range of specified 'urban' zones.

Part 3 of the Vegetation SEPP applies only to vegetation that is declared by a development control plan to be vegetation to which the Vegetation SEPP applies. Where a development control plan doesn't contain such a declaration, urban trees in the Council's area may be unprotected.

Under Part 4 of the Vegetation SEPP, a person must not clear native vegetation in any non-rural area of the State that exceeds the Biodiversity Offset Scheme (BOS) threshold without the authority conferred by an approval of the Native Vegetation Panel.

The site is located within bushland as identified in the *State Environmental Planning Policy (Vegetation in Non-Rural Areas)* 2017 as land zoned IN1 General Industrial. However, the site is entire hardstand, no native vegetation exists on site and no vegetation is to be cleared as part of the proposed development and therefore the approval from the Native Vegetation Panel is not required.

3.3.5 *State Environment Planning Policy No. 64 – Advertising and Signage*

The aim of *State Environmental Planning Policy No 64 – Advertising and Signage* (SEPP 64) is to ensure that signage is compatible with the desired amenity and visual character of an area, provides effective communication in suitable locations and is of a high-quality finish and design. This Policy does not regulate the content of signage and does not require consent for a change in the content of signage.

Part 2 of SEPP 64 details the requirements that a consent authority must be satisfied with prior to granting development consent:

> *A consent authority must not grant development consent to an application to display signage unless the consent authority is satisfied:*
>
> *(a) that the signage is consistent with the objectives of this Policy as set out in clause 3 (1) (a), and*
> *(b) that the signage the subject of the application satisfies the assessment criteria specified in Schedule 1.*

Part 3 (9) of SEPP 64 details advertisements to which this Part applies and states:

This Part applies to all signage to which this Policy applies, other than the following:

(a) business identification signs,
(b) building identification signs,
(c) signage that, or the display of which, is exempt development under an environmental planning instrument that applies to it,
(d) signage on vehicles

SEPP 64 does not apply to the proposed development, as proposed signage to be installed as part of the development is defined as a 'business identification sign'.

3.4 Other applicable legislation or strategies

3.4.1 *Standards for Managing Construction Waste in NSW*

The *Standards for Managing Construction Waste in NSW* commenced on 15 May 2019. The Standards have been implemented to:

- Minimise the risk of harm to human health and the environment from asbestos and other contaminants found in construction waste;
- Ensure operators of construction waste facilities implement appropriate processes and procedures to manage these risks; and
- Improve industry and community confidence in the quality of resources recovered from construction and demolition waste.

The Standards apply to all construction and demolition waste facilities with an environment protection licence for waste storage, waste processing or resource recovery.

The Standards require construction and demolition waste facilities to:

- Implement a two-stage inspection process to ensure asbestos waste and other unpermitted wastes do not enter the facility;
- Implement sorting and waste storage requirements to improve the quality of recovered resources and avoid cross-contamination of materials;
- Ensure construction waste is only transported from the facility if it has been handled in accordance with the Standards on-site; and
- Ensure that all staff managing, supervising or undertaking tasks required by the Standards have been appropriately trained.

Where any load is found or reasonably suspected to contain unpermitted wastes, the entire load of waste must be rejected, and must be removed from the facility on the vehicle on which it arrived.

The Standards also include the following requirements:

- Construction waste must be sorted and classified into individual waste types;
- Sorted construction waste must not be mixed with any other type of waste;
- Each individual waste type must be stored separately, and storage areas must be clearly labelled;
- Stockpiles must be clearly delineated and separated by a minimum of three metres; and
- Stockpiles must be checked by staff every business day to ensure waste is correctly stored.

Compliance with the Standards is a compulsory licence condition for all construction and demolition waste facilities. Failure to comply with the Standards is a breach of section 64 of the *Protection of the Environment Operations Act* 1997.

3.4.2 *Fire and Rescue NSW – Fire Safety Guidelines*

In August 2019, Fire and Rescue NSW published new guidelines that apply to waste and resource recovery operations. These guidelines need to be considered for facilities that are seeking approval for upgrades or changes, and for new facilities.

The purpose of the document is to provide guidance on fire safety in waste facilities that receive combustible waste materials, including adequate provision for fire safety and facilitate safe fire brigade intervention to protect life, property and the environment. The guideline specially outlines the requirement of Fire and Rescue NSW for:

a) Considering for safety during all stages of a waste facility, including site selection, planning, design, assessment and operation;
b) Fire safety systems to be adequate to the special hazards identified within a waste facility and which also meet the operational needs of fire fighters;
c) Safe storage and stockpiling of combustible waste material based on expected combustibility and maximum pile size;
d) Workplace fire safety and fire safety planning, including procedures in the event of fire or an emergency incident.

An assessment of the proposed development will be carried out in the Environmental Impact Statement in accordance with the *Fire and Rescue NSW – Fire Safety Guidelines*.

3.4.3 *NSW Waste Avoidance and Resource Recovery Strategy 2014 - 2021*

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.

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; and
- 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.

The proposed development will increase and expand recycling infrastructure on the Central Coast and will make an important contribution to increasing the recycling rate of:

- Household waste from 52% (in 2010–/11) to 70% by 2021;
- Commercial and industrial waste from 57% (in 2010–11) to 70% by 2021; and
- Construction and demolition waste from 75% (in 2010–11) to 80% by 2021.

3.5 Approvals/Licenses Required

The development is considered to be a Designated Development under *Environmental Planning and Assessment Regulation* 2000.

For Designated Development an environmental impact statement will be required and third parties must be notified and can appeal against a decision to grant consent. Designated Development refers to developments that are high-impact developments (e.g. likely to generate pollution) or are located in or near an environmentally sensitive area (e.g. a wetland). There are two ways a development can be categorised as 'designated development':

- The class of development can be listed in Schedule 3 of the EP&A Regulation as being designated development; or
- An LEP or SEPP can declare certain types of development to be designated.

Examples of designated development include chemical factories, large marinas, quarries and sewerage treatment works and waste management facilities or works.

If a development application is categorised as designated development, the application:

- Must be accompanied by an environmental impact statement (EIS);
- Will require public notification for at least 30 days; and
- Can be the subject of a merits appeal to the Land and Environment Court by objectors.

The proposed Designated Development requires an Environment Protection Licence from the NSW Environment Protection Authority as a Resource Recovery Facility, as the site is located in the levy-paying area and processing capacity is greater than 6,000 tonnes per annum, pursuant to Clause 34(3) of Schedule 1 of the *Protection of the Environment Operations Act* 1997.

4. Local Planning Framework

4.1 *Gosford Local Environmental Plan* 2014

The following section provides the local planning and legislative framework for the proposed development. The purpose of this section is to outline the approval process and identify the applicable local planning controls that relate to the *Gosford Local Environmental Plan* 2014 (Gosford LEP).

4.1.1 *Zone objectives*

The objectives of zone IN1 General Industrial 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 ecologically, socially and economically sustainable development.
- To ensure that retail, commercial or service land uses in industrial areas are of an ancillary nature.
- To ensure that development is compatible with the desired future character of the zone.

4.1.2 *Land use permissibility*

The Somersby Resource Recovery Facility can be defined as a waste or resource management facility which has the meaning of any of the following:

(a) a resource recovery facility,
(b) a waste disposal facility,
(c) a waste or resource transfer station,
(d) a building or place that is a combination of any of the things referred to in paragraphs (a)–(c).

A resource recovery facility is described under the definitions of the Gosford LEP as:

> *"… a building or place used for the recovery of resources from waste, including works or activities such as separating and sorting, processing or treating the waste, composting, temporary storage, transfer or sale of recovered resources, energy generation from gases and water treatment, but not including re-manufacture or disposal of the material by landfill or incineration."*

Under the Gosford LEP, resource recovery facilities are not expressly defined as 'permitted with consent' or 'Prohibited'. However, any other development not specified as 'permitted without consent' or 'prohibited' is considered 'permitted with consent'

4.1.3 *Gosford LEP Part 5.10 – Heritage Conservation*

An archaeological site containing Aboriginal objects is located adjacent to the development site, on Lot 1 DP1194897 (947 Old Pacific Highway). Aboriginal objects and Aboriginal places of heritage significance are protected under Clause 5.10 of the Gosford LEP.

Development application DA51047/2016 included a due diligence report prepared by Baker Archaeology in regard to the Aboriginal site located on Lot 1 DP 1194897. The report concluded that the significant site had adequate protection and that the development would not impact it.

The proposed development will have no impact on the Aboriginal heritage site, or its curtilage, previously identified on the land. There are no proposed changes to the configuration of structures that will impact the Aboriginal site.

The proposed development will be consistent with clause 5.10 of the Gosford LEP.

4.1.4 *Gosford LEP Part 7.4 – Development in Somersby Business Park*

The subject site is identified as being within the Somersby Industrial Park (also known as Somersby Business Park) on the Key Sites map in the Gosford LEP.

Under clause 7.4 of the Gosford LEP, consent must not be granted unless the consent authority considers that the development is consistent with:

a) any applicable plan of management adopted by the consent authority, and
b) the objectives of the clause.

The applicable plan of management for the Somersby Industrial Park is the Draft Plan of Management for Somersby Industrial Park prepared by Connell Wagner Pty Ltd and dated June 2005. This Draft Plan of Management identifies performance objectives and management actions for environmental, Aboriginal heritage and economic values.

The objectives of this Clause 7.4 are as follows:

a) to maximise the opportunity for industrial development in Somersby Business Park to provide employment opportunities in Gosford,
b) to protect ecologically significant land and land with Aboriginal heritage characteristics in Somersby Business Park,
c) to ensure that the function and appearance of future subdivision of, or other development in, Somersby Business Park protects ecologically significant land and land with Aboriginal heritage characteristics within Somersby Business Park,
d) *to provide that subdivision occurs in a flexible manner to take account of ecologically significant land and land with Aboriginal heritage characteristics within Somersby Business Park.*

In regards to the objectives of this Clause 7.4, the proposed development will provide additional employment opportunities in the Central Coast Council LGA meeting objective (a).

Concerning objectives (b) to (d) the site has been cleared as per the previous approval, meaning no ecologically significant vegetation will be lost. The site does contain a significant archaeological site, however, this will protected by the measures outlined in the previous development consent DA51047/2016. The buffer area to the item will not be encroached upon and the item will not be impacted by the proposed development. In summary, no archaeological or ecologically significant impacts will result from the proposed development. Overall, the proposed works therefore meet the objectives of Clause 7.4.

4.1.5 *Gosford Development Control Plan 2013*

The purpose of the *Gosford Development Control Plan* 2013 is:

- To identify Council's expectations and requirements for development within Gosford local government area and build upon the Gosford LEP, the Gosford Planning Scheme Ordinance and Interim Development Order No 122 by providing detailed objectives and controls for development;

- To ensure that all development is consistent with the desired character of the surrounding neighbourhood;
- To identify approaches and techniques which promote quality urban design and architectural outcomes in Gosford local government area; and
- To promote best practice and quality environmental outcomes.

The development is required to demonstrate full compliance the *Gosford Development Control Plan* 2013. Relevant sections and provisions are described in Table 3.1.

4.1.6 *Gosford Development Control Plan 2013 Chapter 3.11 – Industrial Development*

The general objectives of *Chapter 3.11 – Industrial Development* are as follows:

- To encourage good design solutions for industrial development.
- To ensure that new industrial development represents a high level of urban design with recognition of the form and character of the existing man-made and natural context.
- To ensure the efficient use of urban land by maximising development potential of new and existing land and infrastructure.

Many of the compliance requirements under Chapter 3.11 – Industrial Development of the Gosford Development Control Plan 2013 have been addressed in the previous development application DA51047/2016. These include:

- Section 3.11.5.2 – Setbacks and Boundaries
- Section 3.11.5.3 – Building Height
- Section 3.11.5.4 – Building Appearance
- Chapter 6.3 – Erosion and Sedimentation Control
- Chapter 6.4 – Geotechnical Requirements for Development Applications
- Chapter 6.6 – Preservation of Trees and Vegetation
- Chapter 6.7 – Water Cycle Management
- Chapter 7.1 – Car Parking
- Chapter 7.2 – Waste Management

The relevant compliance requirements which will be considered further in the EIS, with consideration of the proposed development within existing infrastructure at the site, include:

- Section 3.11.7.3 – Loading and Unloading
- Section 3.11.8.4 – Pollution Control
- Section 3.11.8.6 – Advertising Signs
- Section 3.11.9.2 – Road Access
- Section 3.11.9.3 – Stormwater Drainage
- Section 3.11.9.5 – Solid Wastes

5. Project Justification

5.1 Strategic Drivers

5.1.1 *NSW "Waste Less, Recycle More 2017-2021"*

The NSW Government's $337 million Waste Less, Recycle More program includes $48 million to support the development of new infrastructure for both municipal, commercial and construction and demolition waste materials.

5.1.1 *NSW EPA's Strategic Plan and the WARR Strategy 2014 -21*

The NSW State Government has committed to ambitious targets for recycling across the State. Targets published in the *NSW EPA Strategic Plan 2017-21* include increasing recycling of municipal waste to 70% and commercial and industrial waste to 70% by 2021-22.

Progress has been made towards the 2021-22 targets. The Waste Avoidance and Resource Recovery Strategy Progress Report 2017-18 outlines the progress against the WARR Strategy's goals to June 2018. The commercial and industrial shows growth in recycling rates from 47% in 2015-16 to 53% in 2017-18 against a target of 70%. The MSW recycling rate, however, remained steady at 42% between these periods against a target of 70%.

Between 2015-16 and 2017-18, total waste generated per capita rose from 2.42 tonnes to 2.69 tonnes. This was primarily due to increased construction activity. However, there was a steady reduction in municipal solid waste (MSW) generated per capita during this period.

The diversion rate of waste from landfill in 2017-18 was 65%, up from 63% in 2015-16, against a 2021-22 target of 75%. This was largely driven by the high resource recovery rates for construction activity. Going forward, investments from *Waste Less, Recycle More* grant funding have generated a pipeline of infrastructure that will progressively come online and increase NSW recycling capacity by almost 2 million tonnes per year.

In accordance with the WARR Strategy priorities, the NSW EPA has focused on investing in recycling infrastructure, behaviour change, developing markets for recycled materials and building capacity for regional planning.

5.1.2 *NSW Draft Waste and Resource Recovery Infrastructure Strategy 2017-2021*

In August 2017, the NSW EPA published the State's first draft strategy for prioritising new recycling infrastructure required across NSW by regional council groupings. The NSW EPA recognises that to achieve the diversion from landfill targets, significant investment in new infrastructure is still needed.

The Draft Waste and Resource Recovery Infrastructure Strategy 2017-2021 found that there were significant projected gaps in expected capacity and demand for construction and demolition waste processing in the Hunter and Central Coast areas by 2021, with a total shortfall of over 460,000 tonnes per annum of available capacity projected.

The draft strategy specifies the need for a least four additional small C&D waste processing facilities to minimise inert waste disposal. The proposed development will help address this gap in recycling infrastructure on the Central Coast.

5.1.3 *20-Year Waste Strategy for NSW*

The Department of Planning, Industry and Environment, including the NSW EPA, is leading the development of a 20-Year Waste Strategy for NSW. The 20-year Waste Strategy brings together a whole-of-government initiative for NSW. The Strategy will provide a long-term strategic focus where communities, industry and all levels of government are working together to build resilient services and markets for waste resources.

The 20-Year Waste Strategy and accompanying policies focus on:

- Sustainability:
  - reducing environmental and human health risks associated with waste generation, processing, treatment and disposal
  - encouraging waste to be viewed as a resource
- reliability
  - securing reliable waste services across metropolitan and regional communities.
- Affordability
  - promoting value-add opportunities to improve the cost-competitiveness of recovered materials
  - managing waste more efficiently and orienting the waste sector to drive better value through recovery and re-manufacture of higher-quality materials.

The 20-Year Waste Strategy will contribute towards NSW's realisation of a circular economy in which resources are valued by keeping products and materials in use for as long as possible.

5.1.4 *NSW Circular Economy Policy Statement*

The NSW Government has developed a Circular Economy Policy to deliver positive economic, social and environmental outcomes.

The circular economy is about changing the way we produce, assemble, sell and use products to minimise waste and to reduce our environmental impact. The circular economy can also be great for business; by maximising the use of our valuable resources, and by contributing to innovation, growth and job creation.

Moving to a circular economy will provide long-term economic, social, and environmental benefits for NSW. This transition will generate jobs, increase the robustness of the economy, increase the accessibility of goods, maximise the value of resources, and reduce waste.

The NSW Circular Economy Policy Statement will help guide NSW Government decision making to transition to a circular economy. It sets the ambition and approach for a circular economy in NSW and provides principles to guide resource use and management.

The NSW Circular Economy Policy Statement will provide a framework for implementing initiatives throughout the product life cycle, from design, manufacturing, and retail to end-of-life-disposal. These initiatives will promote long-lasting design, maintenance, repair, re-use, sharing, transforming products into services, remanufacturing, and recycling. The NSW Government will be an early adopter, implementing those opportunities where the benefits are clear.

5.2 Sustainability

5.2.1 *Environmental*

The ReDirect Recycling Pty Ltd business, through its investments in new resource recovery infrastructure, aims to help NSW strive towards its ambitious objective of reducing NSW's net emissions to zero by 2030 as outlined in the *Net Zero Plan Stage 1: 2020-2030*.

ReDirect Recycling Pty Ltd's mission is to recover materials which can be used in advanced manufacturing in NSW, helping to recover maximum value from discarded resources and reduce the dependence on export markets for recycling waste.

The company will recover materials to be used in Borg's advanced manufacturing business, being the largest manufacturer of melamine panels and components for all joinery applications in Australia. Borg's manufactured products include a range of medium-density fibreboard (MDF), particle board, shelving and components.

By using recovered resources from the urban waste stream in manufacturing, ReDirect Recycling Pty Ltd will be helping the State of NSW to transition to a Circular Economy

5.2.2 *Social and Economic Benefits*

ReDirect Recycling Pty Ltd is developing best practice resource recovery centres across NSW to support the recovery of materials from the urban waste stream. This includes a 150,000 tonne per annum wood and plasterboard recycling facility in Dunheved Circuit, St Marys, and a further 350,000 tonne per annum facility to accept and recover a wide range of commercial and construction waste materials in St Marys. The business will be supported by a third 99,000 tonne per annum integrated resource recovery centre proposed for Pile Rd (this development)

These projects build upon the company's existing urban wood recovery centre in Ingleburn, which supplies recovered wood to support particle board and MDF production in NSW, and a sustainable bedding material for poultry farms.

Combined, the ReDirect Recycling Pty Ltd business is investing more than $100 million into the NSW economy to develop additional recycling infrastructure, helping to create new jobs, economic activity and supporting local communities. The investment will help bring forward more than 600,000 tonnes per annum of new recycling capacity in NSW, which will help accelerate progress towards landfill diversion targets in the NSW Government's Waste Avoidance and Resource Recovery Strategy 2014-2021.

The investments will also help bridge gaps in recycling infrastructure in NSW. In the NSW EPA's Waste and Resource Recovery Infrastructure Strategy 2017-2021, it is estimated that the amount of waste sent to landfill needs to be reduced by around 1.5 million tonnes per year to reach the State's diversion target of 75% by 2021.

ReDirect Recycling Pty Ltd is part of the Borg group of companies. The Borg business model supports sustainable practices and employs over 2000 people nationwide. Development of the Somersby plant will employ an additional 10 staff.

6. Baseline Site Conditions

The following sections provides an assessment of the existing environmental conditions, potential impacts and proposes mitigation measures (where appropriate) to ensure that the facility is designed in line with best practice and does not impact on people or the local environment. These issues have been considered based on limited information and will be addressed in more detail in the EIS.

6.1 Site topography

The Somersby Industrial Park is situated on the Somersby Plateau and has a maximum elevation of approximately 230 metres Australian Height Datum (AHD). The subject site rises from approximately 179m AHD in the east to approximately 194m AHD in the west.

6.2 Geology

The geology of the site is Hawkesbury Sandstone comprising medium-to coarse-grained quartz sandstone with minor shale and laminate lenses; and Narrabeen Group – Gosford Subgroup – Terrigal Formation comprising lithic quartz sandstone, siltstone, and claystone.

6.3 Acid sulphate soils

The site mapped as Class 5 Acid Sulfate Soils. Class 5 mapped land has no known occurrence of Acid Sulfate Soils. The subject site is approximately 2.5 kilometres from any Class 1-4 mapped land. The risk for potential acid sulphate soils (PASS) is considered extremely low. No further assessment of PASS is considered warranted.

6.4 Air quality

The surrounding area is typical of a mixed use of commercial and industrial area. The background air quality levels are largely influenced by road traffic and surrounding businesses. The proposed development is separated from the sensitive receptor by other existing industrial developments.

The site will not accept any putrescible or readily biodegradable wastes. Therefore, odour should not be an issue for this site. The main air quality issue associated with this type of recycling facility is dust.

Due to the physical nature of the operational activities, there is the potential for air pollution due to suspended dust particles. The dust which would emanate from the site would generally be caused by either wind or traffic entering and exiting the site. The emission sources and major pollutants identified at the Proposal site are as follows:

- Particulate emissions from loading/unloading of waste material;
- Particulate emissions from waste material handling/sorting/processing activities; and
- Particulate emissions from onsite vehicle movements.

A qualified air quality consultant engineer will be engaged to prepare an Air Quality Impact Assessment Report for submission as part of the EIS.

6.5 Fire

The site is not categorised as bushfire prone land and has been cleared of all vegetation. Adjoining premises have also been cleared and developed. Premises to the north, east and south are mapped as Bushfire Category 2 land however the site is outside the vegetation buffer zones for these areas.

However, given nature of the stored and processed material on the site extra care will need to be taken in fire suppression systems within and around the building. A full fire sprinkler system will be considered in the final building design to ensure compliance with the *National Construction Code* and the guideline for *Fire Safety in Waste Facilities*.

6.6 Terrestrial Biodiversity

The Site is located in an industrial area and is not located in any areas identified as Terrestrial Biodiversity.

The site has been subject to extensive disturbance from previous industrial uses. The site, and general locality is void of vegetation and no clearing is required as part of the proposed development. Therefore, it is unlikely that any requirements of SEPP 44 will be triggered by the Proposed Development. As the proposed development is unlikely to cause unavoidable impacts on the site's vegetation, a Vegetation Management Plan will not be prepared as part of the EIS.

6.7 Groundwater

A search of the NSW EPA public register of contaminated sites notified to NSW EPA under Section 60 of the CLM Act did not identify any records for the Site or any land adjacent to the Site.

As part of the approved development under DA51047/2016, the site will be fully sealed, thus protecting underlying soils from contamination for current and historic site activities. The proposed development works will involve only minor excavation of soil for installation of the weighbridges. Excavated soil will be tested and classified as per the NSW EPA's *Waste Classification Guidelines* (2014). Given the minor nature of works and the low risk of site contamination from existing site uses, further assessment under SEPP55 is not warranted.

6.8 Heritage

There are a total of 22 Aboriginal heritage sites with rock engravings within the Somersby Industrial Park. Of these 22 sites, 10 are closely associated with axe grinding grooves and 1 site occurs on a sandstone platform above a rock shelter with pigment art.

An archaeological site containing Aboriginal objects is located adjacent to the development site, on Lot 1 DP1194897 (947 Old Pacific Highway). Development application DA51047/2016 included a due diligence report prepared by Baker Archaeology in regard to the Aboriginal site located on Lot 1 DP 1194897. The report concluded that the significant site had adequate protection and that the approved development would not impact it.

The existing buffer around the site is to be maintained which will provide adequate protection around the archaeological site and the proposed development will not impact it, or its curtilage. There are no proposed changes to the configuration of structures that will impact the Aboriginal site.

6.9 Visual amenity

Warehouse and landscaping design were approved under DA51047/2016 and DA56372/2019 and therefore existing amenity will not be impacted by the proposed development.

6.10Social and economic impacts

The facility is expected to employ up to 10 people, full time, once fully operational. This will provide additional employment in the local area.

The development is in an established industrial area. It is unlikely to have an adverse social impact. The *Environmental Planning and Assessment Act* 1979 requires social impacts to be assessed and considered as part of the overall environmental impact assessment of all State significant projects. A Social Impact Assessment will be conducted in accordance with the *Draft Social Impact Assessment Guideline*.

6.11Surface water

A stormwater drainage and quality strategy has been developed for the site, under DA51047/2016. A Water Cycle Management Plan was submitted as part of the development application to Gosford City Council (Refer to Appendix 4).

In general, all stormwater runoff from the proposed hardstand areas, materials handling shed, truck wash and mechanics workshop is directed to the 810m^3 on-site detention (OSD) basin and treated by a HUMES Humeceptor before discharging from the site. Stormwater runoff from a portion of the site and bypass the OSD and Humeceptor, while the carpark on the eastern boundary is treated by SPEL Stormsacks before discharging from the site.

All operations associated with the development will be performed inside the warehouse environment. Rainwater will not come into contact with site operations. Due to the impervious nature of external areas, it is anticipated that all surface water will occur as overland flow and captured by the existing onsite stormwater management system as described below.

The proposed development will involve the installation of a wheel wash for trucks exiting the warehouse building after tipping to clean wheels before exiting onto the public road. This will reduce the risk of waste entering the stormwater and leaving the site.

In addition, the proposed development will involve the installation of bunding around the warehouse to contain firewater in the unlikely event of fire and installation of a stormwater isolation valve system to contain firewater on-site and prevent release of contaminated firewater to the council stormwater system. The firewater system will be installed to comply with the *Fire and Rescue NSW – Fire Safety Guidelines*. Bunding will also ensure any major spills are captured before entering the stormwater system.

A qualified consultant will need to prepare a Water Quality Impact Assessment Report for submission as part of the EIS. The report will need to address the likely risk of the proposed development on the existing stormwater system and whether the approved stormwater treatment system (DA51047/2016) is sufficiently capable to detain and treat stormwater from the site and proposed activities.

6.12Flooding

The site is not located in a flood prone area and therefore no further assessment is required.

6.13Traffic

Access to the facility will be via Pile Road. Pile Road connects with the Old Pacific Highway. Both Pile Road and the Old Pacific Highway have direct access to the Central Coast Highway and M1 Pacific Motorway through Somersby Industrial Park. The Central Coast Highway allows for direct connection towards Gosford as well as connecting to the M1 Pacific Motorway.

It is expected that additional traffic generated by the proposed development will be well within the capacity of the existing roads. A qualified traffic engineer will need to prepare a Traffic/Parking Impact Assessment Report for submission as part of the EIS.

The report will need to address the likely impact of intensified use of the site on the flow of traffic on Pile Road and the Old Pacific Highway as well as on-site manoeuvring, truck volumes and any proposed parking arrangements. Traffic management will be more thoroughly addressed in the EIS.

6.14Noise and vibration

The nearest noise sensitive receptor is a rural property located over 500 metres to the north west of the proposed development. The surrounding area is typical of a mixed use of commercial and industrial area. The background noise levels are largely influenced by road traffic and vary in level due to traffic volumes and the distance from the road. The proposed development is separated from the sensitive receptor by other existing industrial developments.

The processes which may result in noise emission of include:

- Movement of vehicles around the proposed development site on paved road surfaces;
- Unloading of waste materials;
- Movement of material around the site;
- Material processing;
- Loading trucks with product material; and
- Emissions from vehicle and equipment.
- Impacts due to vehicle movements through the industrial area are considered negligible.

However, it is expected that additional noise and vibration generated by the proposed development will be well below the recommended noise and vibration amenity levels. A qualified noise consultant engineer will be engaged to prepare a Noise and Vibration Impact Assessment Report for submission as part of the EIS.

An archaeological site containing Aboriginal objects is located adjacent to the proposed development site, on Lot 1 DP1194897 (947 Old Pacific Highway).

The existing buffer around the site is to be maintained which will provide adequate protection around the archaeological site and the proposed development will not impact it.

6.15Surrounding land use

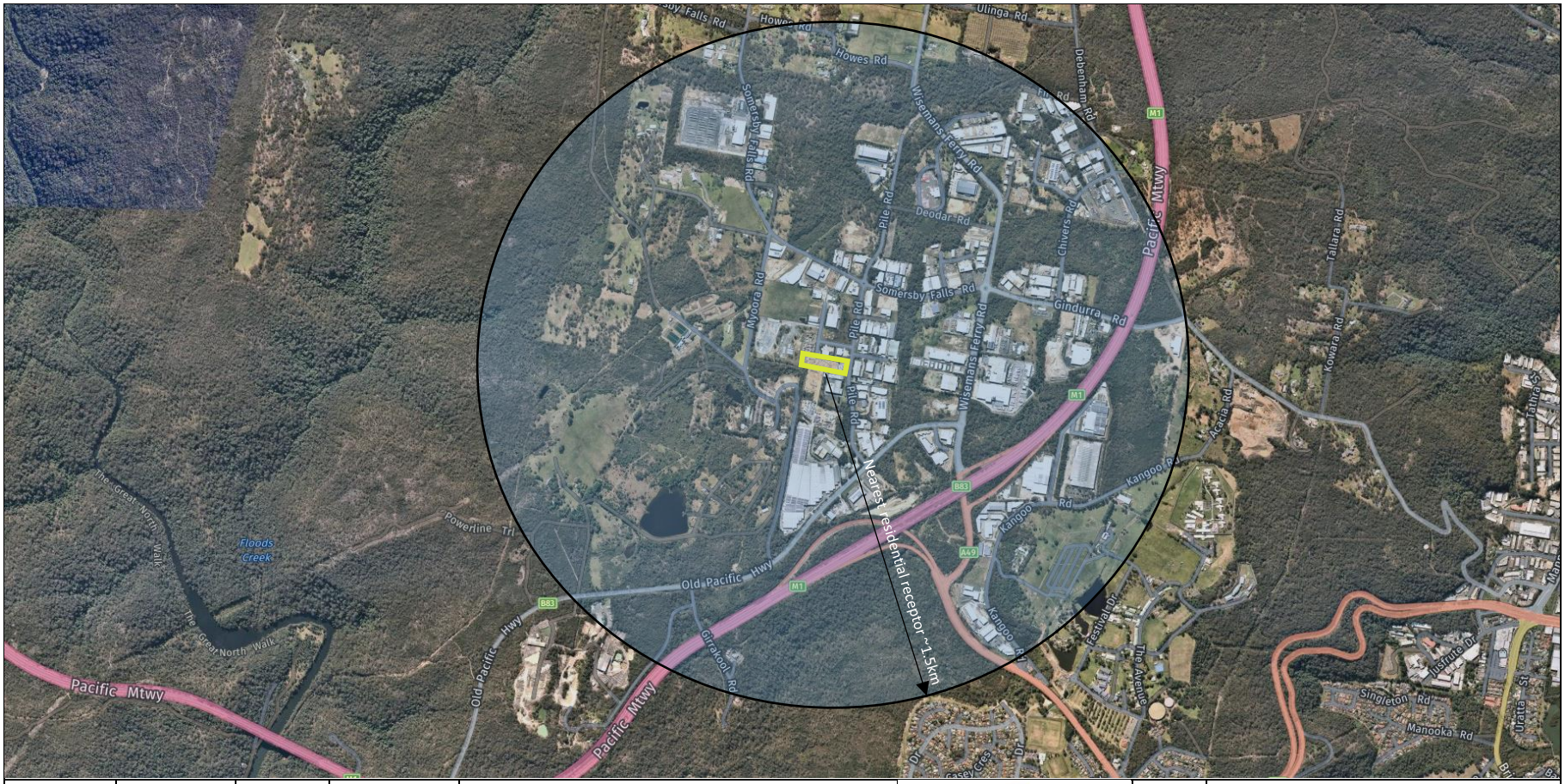
The site is also surrounded by a mix of commercial and industrial premises. Nearby businesses and premises are shown in Figure 6.1.

The site is located in the Somersby Industrial Park, a light industrial area zoned IN1 General Industrial. The predominant types of businesses in the area are offices, warehouses and equipment suppliers.

The closest residential properties are located approximately 1.5km to the southeast There are no schools or childcare centres within 1.5km.

Consideration will need to be given to sensitive neighbouring businesses. Impacts will be minimised as recycling operations and storage of materials will be completely enclosed within the warehouse.

Figure 6.1. Aerial view of the subject site at 33 Pile Road, Somersby showing neighbouring developments and potential sensitive receptors within 1.5kms of the site. Site boundaries are shown in yellow.



Date	Revision	Drawn By	Site description	Jackson Environment and Planning Pty Ltd	Client	ReDirect Recycling Pty Ltd
17/11/20	Revision A	R. Loemker	33 Pile Road, Somersby (Lot 1 DP 1093201, Lot 5 DP 1151970)	Strategy | Infrastructure | Compliance | Procurement A: Suite 102, Level 1, 25-29 Berry St, North Sydney NSW 2060 E: admin@jacksonenvironment.com.au T: 02 8056 1849 W: http://www.jacksonenvironment.com.au	Project	Somersby Resource Recovery Facility
					Title	Aerial photo of site – surrounds
					Scale	Not to Scale
					Source	Nearmap

7. Environmental matters and impacts

The following table outlines the matters and impacts relevant to the proposed facility, along with the type of assessment that would be undertaken as part of an Environmental Impact Statement.

Table 7.1. Relevant matters and impacts for consideration in the EIS phase of the project.

Environmental and social matters		Impact	Is the impact, without mitigation, likely to cause a material effect with regard to its …				Does the impact need assessment in the EIS	Relevant Section in scoping report
			Extent	Duration	Severity	Sensitivity		
Amenity	Acoustic	Noise from processing equipment and heavy vehicle traffic, however operations to be fully enclosed, limiting noise impacts	✓	✓	✓	✓	Yes. A Noise and Vibration Impact Assessment will be conducted as part of the EIS.	**Error! Reference source not found.**Section 6.14
	Visual	The pproposed development will operate within an approved warehouse. Landscaping design approved under DA51047/2016 and DA56372/2019 will be implemented to minimise visual impacts					No.	Section 6.9
	Odour	The site will not accept any putrescible or readily biodegradable wastes. Therefore, odour should not be an issue for this site					No.	Section 6.4
	Microclimate	No impact.					No.	
	Other – specify	N/A					N/A	

Environmental and social matters		Impact	Is the impact, without mitigation, likely to cause a material effect with regard to its …				Does the impact need assessment in the EIS	Relevant Section in scoping report
			Extent	Duration	Severity	Sensitivity		
Access	Access to property	Heavy vehicle traffic accessing the property.	✓	✓	✓	✓	Access to the property will be assessed as part of the Traffic Impact Assessment.	Section 6.13
	Access to services	No significant impacts on existing power, water, sewerage and telecommunication services					No.	
	Road and rail network	Heavy vehicle traffic will increase on roads leading to Pile Road.	✓	✓	✓	✓	A Traffic Impact Assessment will be prepared as part of the EIS.	Section 6.13
	Off-site parking	Under DA56372/2019, an allocation of 65 car parking spaces on site was provided to accommodate parking demands whilst also providing additional capacity for any future expansion or change of use within the site, per the *Gosford Development Control Plan* 2013. The car parking provided satisfies the minimum car parking requirements set out in *Gosford Development Control Plan* 2013.					No.	
	Other – specify	N/A					N/A	
Built environment	Public domain	No impact.					No.	
	Public Infrastructure	No impact.					No.	
	Other built assets	No impact.					No.	

Environmental and social matters		Impact	Is the impact, without mitigation, likely to cause a material effect with regard to its …				Does the impact need assessment in the EIS	Relevant Section in scoping report
			Extent	Duration	Severity	Sensitivity		
	Other – specify	N/A					N/A	
Heritage	Natural	No impact.					No.	
	Cultural	No impact.					No.	
	Aboriginal culture	No impact.					No.	Section 4.1.3 Section 6.8
	Built	No impact.					No.	
	Other – specify	N/A					N/A	
Social	Health	No impact. Facility will be fully enclosed.					No.	
	Safety	Potential fire risk.	✓	✓	✓	✓	Fire safety study to be prepared as part of the EIS.	Section 6.5
	Community services and facilities	No impact.					No.	
	Housing availability	No impact.					No.	
	Social cohesion	No impact.					A Social Impact Assessment will be prepared as part of the EIS.	Section 6.10
	Other – specify	N/A					N/A	
Economic	Natural resource use	No impact.					No.	

Environmental and social matters		Impact	Is the impact, without mitigation, likely to cause a material effect with regard to its …				Does the impact need assessment in the EIS	Relevant Section in scoping report
			Extent	Duration	Severity	Sensitivity		
	Livelihood	Additional 10 FTE jobs and capital investment of $10M					No.	Section 9
	Opportunity cost	No impact.					No.	
	Other – specify	N/A					N/A	
Air	Particulate matter	Potential emissions from processing and loading/unloading waste loads as well as vehicle movements on site	✓	✓	✓	✓	An Air Quality Impact Assessment will be prepared as part of the EIS.	Section 6.4
	Gases	No impact. No gas emissions.					No.	
	Atmospheric emissions	Potential greenhouse gas emissions from vehicles and electricity use. Minimal impact	✓	✓	✓	✓	No.	
	Other – specify	N/A					N/A	
Biodiversity	Native vegetation	No impact.					No.	
	Native fauna	No impact.					No.	
	Other – specify	N/A						
Land	Stability / structure	No impact.					No.	
	Soil chemistry	No impact. Low risk of acid sulphate soils.					No.	
	Capability	No impact.					No.	

Environmental and social matters		Impact	Is the impact, without mitigation, likely to cause a material effect with regard to its …				Does the impact need assessment in the EIS	Relevant Section in scoping report
			Extent	Duration	Severity	Sensitivity		
	Topography	No impact.					No.	
	Other – specify	N/A					N/A	
Water	Water quality	Minimal impact, as a stormwater drainage and quality strategy has been developed for the site, under DA51047/2016.	✓		✓		A Stormwater Management Plan will be prepared as part of the EIS	**Error! Reference source not found.**Section 6.11
	Water availability	Water use for employee areas and dust control.	✓	✓			Water use and conservation will be estimated as part of a Water Cycle Impact Assessment.	Section 6.11
	Hydrological flows	No impact. Site is entirely hardstand and a stormwater drainage and quality strategy has been developed for the site, under DA51047/2016.					No.	
	Other – specify	N/A					N/A	
Risks	Coastal hazards	No impact.					No.	
	Flood waters	No impact.					No.	
	Bushfire	No impact.					No.	
	Undermining	No impact.					No.	

Environmental and social matters		Impact	Is the impact, without mitigation, likely to cause a material effect with regard to its …				Does the impact need assessment in the EIS	Relevant Section in scoping report
			Extent	Duration	Severity	Sensitivity		
	Steep slope	No impact.					No.	
	Other – specify	N/A					N/A	

8. Stakeholder and community consultation

As part of the EIS preparation, ReDirect Recycling Pty Ltd will consult with relevant state government agencies and surrounding land users.

As far as possible, all property owners within 500 m will be identified and contacted. Surrounding properties will be informed about the proposed development and invited to provide comment. All feedback will be recorded and considered in the development design.

9. Capital investment value of project

The capital investment required for the development of the Somersby Resource Recovery Facility is expected to be $10M. This is a significant capital investment, which will create jobs in construction of the facility and 10 ongoing full-time jobs during operations, providing benefits to the environment as well as the local economy of the Central Coast.

10. Summary of Environmental Impacts and Assessments Required.

Table 10.1 provides a summary of the environmental assessments that will be prepared as part of the EIS for to address the environmental impacts that have been identified for the proposed development.

Table Error! No text of specified style in document.**10.1. Summary of Environmental impact assessments required.**

Environmental Assessment	Environmental Impact
Air quality impact assessment	Health
	Particulate matter
	Gases
	Atmospheric emissions
Community consultation and social impact assessment	Community services and facilities
	Social cohesion
	Opportunity cost
	Surrounding land uses
Economic analysis	Livelihood
Visual impact assessment	Visual impact
Fire safety study	Safety
Noise and vibration study	Acoustic
Water cycle impact assessment and stormwater management plan	Water quality
	Water availability
	Hydrological flows / Groundwater
Traffic impact assessment	Road and rail network
	Off-site parking
	Public infrastructure

12. Conclusion

This Preliminary Environmental Assessment has been prepared for a proposed Resource Recovery Facility located at 33 Pile Road, Somersby (Lot 1 DP 1093201 and Lot 5 DP 1151970). The proponent is ReDirect Recycling Pty Ltd.

The proposed development will include the operation of a best practice Resource Recovery Facility within a previously approved warehouse building (with minor modifications). The facility will include a fully enclosed and integrated Resource Recovery Facility with a proposed maximum processing capacity of 99,000 tonnes per annum of principally non-putrescible materials.

The development will serve the recycling needs of the Central Coast community, which currently rely on council operated waste disposal facilities, with limited facilities for recycling of building and commercial waste materials.

The warehouse building for the proposed development was approved on 16th December 2019 by Central Coast Council under DA56372/2019. The proposed development will see modifications of the approved warehouse facility and its change of use into a fully integrated resource recovery facility.

As discussed in this report, under Schedule 3, Clause 32(1)(b)(iii) of the *Environmental Planning and Assessment Regulation* 2000, the proposed development will be classified as Designated Development. As a result, an EIS will be required as part of the development application and planning approval for the development. The planning consent authority for the development will be the Hunter and Central Coast Regional Planning Panel.

Before the EIS is prepared, the proponent needs to conduct a 'Preliminary Environmental Assessment' of the project (this report) and request the Secretary's Environmental Assessment Requirements (SEAR's) from the NSW Department of Planning, Industry and Environment (DPIE). This is a requirement under Section 5.18 of the *Environmental Planning and Assessment Act* 1979.

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. This has been undertaken in accordance with the Department of Planning and Environment (2017) *Scoping an Environmental Impact Statement - Draft Environmental Impact Assessment Guidance Series.* The assessment has considered planning and legislative requirements, as well as site conditions, topography, geology and soils, surface water management, groundwater, easements, licences and covenants, adjoining premises, nearest sensitive receptors, traffic, social and cultural environment, visual catchment, stakeholder and community consultation, and a stakeholder consultation strategy.

As part of this assessment, we have also considered the strategic drivers, including 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.

The preliminary environmental assessment found that the consideration will need to be given to neighbouring businesses, and an increase in the number of vehicles entering the site must be carefully considered to avoid any impact on neighbours or on the local road network. However, impacts on noise, air quality and emissions to water are expected to be minimised by maintaining operations within the fully enclosed warehouse environment.

These factors and other issues raised by DPIE and other regulatory authorities should be considered in the Environmental Impact Statement to ensure that the proposed upgrades are carried out to protect human health and the environment, while supporting the development of important recycling infrastructure for the region.

The development is also considered to be an Integrated Development, requiring a licence from the NSW EPA under Schedule 1 of the *Protection of the Environment Operations Act* 1997.

Appendix 1 – Notice of Determination for construction of warehouse (DA56372/2019)

Appendix 2 – Approved plans for construction of warehouse (DA56372/2019)

Appendix 3 – Proposed site plans and truck turning paths

Appendix 4 – Water Cycle Management Plan approved under DA51047/2016