



8th September 2021

Mr William Hodgkinson
Team Leader
Industry Assessments
Department of Planning, Industry & Environment
Locked Bag 5022
Parramatta NSW 2124

Dear Mr Hodgkinson,

Re: Response to Agency Comments – Wood and Plasterboard Recycling Facility, 25 Dunheved Cct, St Marys (SSD-10474)

Jackson Environment and Planning Pty Ltd has been engaged by ReDirect Recycling Pty Ltd to assist with the development application for a Wood Waste Recycling Facility at 25 Dunheved Cct, St Marys (SSD-10474).

I am writing in response to your letter of 19 August 2021 regarding the request for additional information on the proposed development (SSD-10474).

The attached table (Attachment 1) provides a summary of the response to each comment received. A memo from the traffic consultants, TTPP, addressing the main traffic comments is provided at Attachment 2. An updated Waste Management Plan is provided at Attachment 3.

The proponent generally agrees with the proposed conditions of consent for the facility. However, there are two conditions of consent proposed by NSW EPA that the proponent does not agree with.

Operating hours

The development application proposes that the facility be permitted to operate 24 hours per day, seven days per week. This is appropriate for an industrial premises in an industrial area (zoned IN1 General Industrial).

The Noise and Vibration Impact Assessment (NVIA) and Air Quality Impact Assessment (AQIA) clearly show that the impact on the nearest sensitive receptors will be negligible, and well within the Noise Trigger Levels in the EPA's *Noise Policy for Industry*.

The site is located within an industrial estate, 800 m from the nearest residential receptor. All waste receipt, sorting and recycling operations will be performed within a fully enclosed

warehouse building with doors closed. Traffic routes proposed will not impact on the amenity of residential receptors.

The NSW EPA has provided no justification for the reduced hours of operation, which set out a recommendation that the facility is not to operate on Sundays and public holidays. The proponent requests that this condition of consent be reconsidered, and the original operational hours of 24 hours per day, seven days per week be approved.

Feasibility study on reducing diesel emissions

The NSW has proposed a condition of consent that, within 6 months of approval, a feasibility study into options to reduce emissions from diesel-powered machinery. The NSW EPA has provided no justification for this proposed condition and the proponent considers it unnecessary.

The AQIA showed there were no significant air quality impacts from the facility operations. The site already uses electric and low-emissions machinery, as far as practicable.

The proponent requests that this condition of consent be reconsidered.

If you have any queries or would like further information, please contact our office.

Yours sincerely,



Dr Mark Jackson B.Sc. (Hons), PhD, Grad. Cert. Mgmt., Exec. Masters Public Admin. (USYD)

Director

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Attachments

1. Summary table of responses to agency comments
2. Traffic engineering advice TTPP
3. Updated waste management plan