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Strategic Planning,  
NSW Department of Planning, Infrastructure and Environment

**PARKES SPECIAL ACTIVATION PRECINCT SEPP AND PARKES SPECIAL ACTIVATION PRECINCT  
MASTERPLAN SUBMISSION**

Dear Planner,

MRA Consulting is writing on behalf of Westlime Pty Ltd to provide feedback on the proposed Special Activation Precinct at Parkes. We welcome the opportunity to comment and hope that it will lead to an improved Masterplan for the Parkes SAP.

MRA/Westlime supports:

- A bespoke planning instrument that simplifies the planning process for waste and resource recovery for development within the designated precincts.
- The coordination of infrastructure development at the rail intermodal as an essential element to enable the transfer of waste and recycling between the generator, the processor and the end market.
- The zoning of the Westlime site as resource recovery precinct.

MRA notes that there are three separate Resource Recovery areas listed in the Resource Recovery Sub-precinct. Generally, it will not be as commercially attractive to establish waste precincts which are geographically disjointed and potentially in competition with each other. It is preferable that there is one Eco-Industrial Park (Resource Recovery and Recycling Precinct), which encompasses resource recovery and end-of-life disposal options.

In the view of Westlime, the use of the intermodal rail terminal should be confined to transfer of materials only and should not be conflated with actual resource recovery activities (for the reasons are dealt with below).

The main focus areas in this submission are with regard to:

1. Resource recovery and recycling sub-precincts
2. Staging Plans
3. Designated use as a Waste to Energy Facility

**1. Resource Recovery and Recycling sub-precincts**

The Environmental, Heritage and Sustainability Summary Report (p37) (Department of Planning, Industry and Environment), indicates that there are three Resources and Recycling sub-precincts, including “the existing Parkes Shire Council waste facility, the existing Westlime operations and an area accessible to the freight corridor to the south of Brolgan Road which may include an energy from waste facility.”

It is further understood that the existing Parkes waste Management Facility is nearing end-of-life and therefore waste disposal may migrate to another site in the near future. That site must be capable of managing local waste at a cost-effective manner, particularly considering that the waste will not be subject to a landfill levy. In conjunction with an end-of-life waste management solution, it is also anticipated that there would be maximum resource recovery in accordance with Circular Ecology Principles and provided by an Eco-Industrial Park.

Due to competition between sites, available quantity of input materials and potential transport distances to source tonnes, there should not be two resource recovery/industrial ecology sites operating. The establishment of more than one Eco-Industrial (EI) Park will:

- Defeat the purpose of the EI Park, which is to collocate synergistic opportunities;
- Result in geographically disjointed precincts; and
- Cause conflict between resource recovery and recycling sub-precincts due to competition.

Of the three sites, the Westlime site is the preferred location for the Industrial Ecology Park as it provides for:

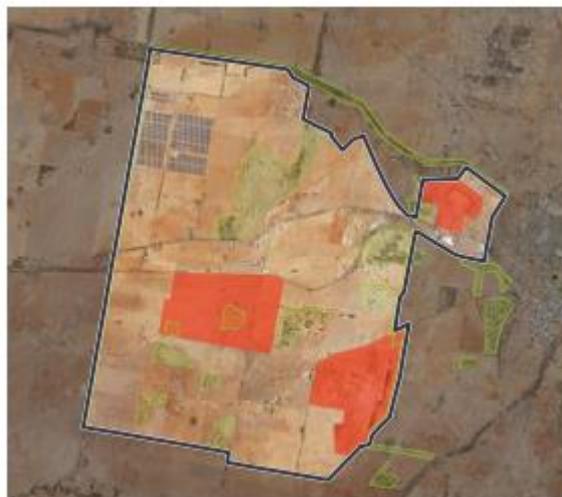
- A single location able to provide for any potential uses;
- An area that is remote from the town and other development precincts;
- Suitable amenity buffers;
- Appropriate zoning;
- Sufficient space to expand on existing land;
- A dedicated location to waste and recycling;
- No conflict with any future expansion of adjacent uses;
- No environmental impacts due to flood-prone land (see p 15 of the Draft Masterplan);
- Zero impact on valuable agricultural land;
- A site which is ideal for waste and resource recovery and has the positive result of rehabilitation of the mine site;
- Local opportunity - Enables the expansion of job opportunities which are generated and managed by local industry. Job opportunities for a resource recovery facility are typically 9.2 FTE per 10,000 tonnes of waste.

The Draft Masterplan does not align with feasible prospects for the Parkes SAP with regard to the Resource Recovery and Recycling sub-precincts. Page 11 of the Draft Masterplan highlights the Sub-Precincts. It mentioned that it is:

*Located near the centre and east of the site, the Resource Recovery and Recycling Sub-Precinct also includes the existing Westlime quarry and Councils existing landfill.*

*Co-located with the inter-modal transport network, this area is ideally placed to receive and re-process waste and resources, championing circular economy principles as part of an Australian-first 'Eco-Industrial Park'.*

Figure 1: Resource Recovery and Recycling sub-precinct, Parkes Draft Masterplan 2019



As mentioned above, it is imperative that there is only one resource recovery sub-precinct. The above wording obviously gives preference to the central area of the Special Activation Precinct, mentioning that it is “Co-located with the inter-modal transport network...”, “...ideally placed...” and “...part of an Australian-first ‘Eco-Industrial Park’”.

The paragraph is therefore not suitable for inclusion in the draft Masterplan as it co-locates the intermodal transfer station with the Eco-Industrial Park.

## 2. Staging Plans

Indicative Staging (p17 of the Draft Masterplan) highlights the Westlime site for development in the final and fourth stage. The text states that: “Staging plans will be developed to ensure the orderly expansion of the Special Activation Precinct. The Precinct is expected to be fully realised within 40-50 years.”

The Westlime site is a priority site for development as a waste and resource recovery precinct, and therefore should be included at Stage 1. The support of the re-development of Westlime Quarry by Local and State government is important for realising the employment and investment potential of the Special Activation Precinct. There is no justification in a staging plan that relegates development of the Westlime Resource Recovery Eco-Industrial Park to Stage 4 and results in diminished opportunity for the local community.

### 3. Waste to Energy

Waste to Energy is a relatively new initiative in Australia, with only one operating facility located in South Australia. *The Parkes Special Activation Precinct Economic and industry analysis Final report*, August 2019, prioritises the establishment of a Waste to Energy facility, mentioned in the executive summary and throughout the document as central to the growth of the growth of the sub-precinct.

For a WtE facility to be successful, it must achieve:

- Broad community support;
- Sufficient tonnes to be commercially viable;
- Proven tonnage source that is compliant with the NSW EfW Policy; and
- Compliance with air emissions criteria.

Previous development applications in NSW have indicated that EfW is subject to substantial hurdles in the development application stage. Prior to endorsing an EfW facility as part of the Masterplan and waste sub-precinct, it is crucial that there has been a comprehensive analysis of the business case, there is the ability to source sufficient waste (which complies with the EfW policy) and there is overarching support from the community. The establishment of EfW is not only a planning decision, but also takes into account policy, commercial and social considerations.

Consequently, the Waste to Energy option is not a certainty (as indicated in the Economic and Industry Analysis) and may not be able to be realised. An options analysis and community consultation is the logical progression to determine the appropriate transition pathway for the existing landfill. These investigations will also inform appropriate landuse and site allocation.

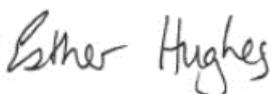
### Proposed actions

In summary, MRA suggests that:

- The area adjacent to the intermodal is not zoned as waste and resource recovery (but is recognised for use as a waste transfer station), so that there is no potential conflict between nearby precincts.
- The development of the Westlime site is included in Stage 1 of the Staging Plans.
- A Resource Recovery options analysis be undertaken in conjunction with community consultation.

Westlime is seeking an opportunity to meet with the NSW Department of Planning, Infrastructure and Environment to discuss the role of the Westlime site in the development of the Parkes Special Activation Precinct. It would be appreciated if you could advise us of a potential date and time for an appointment.

Yours sincerely



*Esther Hughes*  
Principal Environmental Planner  
MRA Consulting Group

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