

Mr Luke Krstanovski  
Visy Recycling - State Operations Manager NSW  
Level 11  
2 Southbank Boulevard  
Southbank Victoria 3006

19/12/2019

Dear Mr Krstanovski

**Visy Dry Recyclables Facility (SSD-10364)  
Response to Submissions**

The exhibition of the development application including the Environmental Impact Statement (EIS) for the above proposal ended on 18 December 2019. All submissions received by the Department during the exhibition of the proposal are available on the Department's website at [www.planningportal.nsw.gov.au/major-projects/projects](http://www.planningportal.nsw.gov.au/major-projects/projects).

The Department will send through a further submission from Fire and Rescue NSW once these are available.

The Department requires that you provide a response to the issues raised in those submissions, which are attached in accordance with clause 85A(2) of the Environmental Planning and Assessment Regulation 2000. In addition, please address the attached issues raised by the Department. Please provide a response to the issues raised in these submissions within two months.

Note that under clause 113(7) of the Environmental Planning and Assessment Regulation 2000, the days occurring between the date of this letter and the date on which your response to submissions is received by the Secretary are not included in the deemed refusal period.

If you have any questions, please contact Katelyn Symington, who can be contacted on (02) 8275 1216/ at [katelyn.symington@planning.nsw.gov.au](mailto:katelyn.symington@planning.nsw.gov.au).

Yours sincerely



Chris Ritchie  
Director  
Industry Assessments

**as delegate for the Secretary**

Attached: Request for Further Information – Department of Planning, Industry and Environment

**ATTACHMENT 1**  
**SSD 10364 – VISY DRY RECYCLABLES FACILITY – FURTHER INFORMATION**  
**DEPARTMENT OF PLANNING, INDUSTRY AND ENVIRONMENT (DPIE) KEY ISSUES**

**Traffic and Swept Paths**

- Truck movements in Table 15.3 of the EIS and Table 2 of the TIA do not reflect all trucks entering and exiting the site. Please update the table.
- Section 15.2.2 of the EIS references a peak period of 9am to 10pm. This should be 10am. In addition, the 8am to 9am should show the same number of movements and so the peak hours should consider referencing both peak hours.
- In Section 15.2.2 of the EIS the 3pm to 4pm peak hour should have 16 movements assuming all vehicles enter and exit the site.
- Section 6.2.1 of the TIA states that there are 26 staff in three shifts, however the TIA assumes 26 vehicle trips per hour during the AM peak period and 26 vehicle trips per hour during the PM peak period. Please specify whether this is during the road peak traffic or the site peak traffic as it is noted in section 4.2 that the 26 staff are between 6am and 10pm.
- Section 6.2.1 of the TIA also states there are three shifts, however section 4.2 describes two shifts. Please confirm if there are multiple shifts and explain why 26 trips are expected during peak times i.e. if this represents a worst-case scenario this should be stated as well as what would be a typical scenario.
- It is hard to reconcile Table 15.3 and Table 15.4 of the EIS. Consider setting out all traffic movements in a single table and ensure that references to traffic movements are consistent.
- During the site visit on 25 October 2019 heavy traffic on Burrows Road was observed, including a number of trucks turning right into the Bingo/Dial-a-dump site adjacent to the proposed development. A cumulative impact assessment, including swept path diagrams, should be provided to demonstrate that there are no conflicts due to the two facilities operating in close proximity. This may include some consultation with the site operator and Council to ensure that trucks are able to manoeuvre safely and that there will not be queuing on the local road network.

**Air quality**

- It is noted that the AQIA identifies predicted exceedances for PM<sub>2.5</sub> at nearby sensitive receivers, notwithstanding that proposed development has a low incremental contribution and is not expected to cause additional exceedances of 24-hour PM<sub>2.5</sub> concentrations. Please describe any mitigation measures which have been included to ensure that residual impacts are managed in line with best practice.
- Please respond to the EPA's comments on air quality in the RTS.
- A number of nearby receivers, including neighbouring businesses and the childcare centre raised concerns about the impacts of the proposed development on air quality and human health. Please address these concerns directly.

**Waste**

- A contingency management plan will be required please include this in the management and mitigation measures.

## **Fire**

- As the proposed development includes alternative solutions, Fire and Rescue NSW must be consulted and evidence of this consultation provided.

## **Hazards**

- Although the SSD will not involve the storage, handling and transport of dangerous goods beyond the relevant thresholds in the Department's Applying SEPP 33, the Applicant adopted an appropriately conservative approach by submitting a preliminary hazard analysis (PHA), prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 6, 'Hazard Analysis', to verify if the SSD complies with the Department's Hazardous Industry Planning Advisory Paper No. 4, 'Risk Criteria for Land Use Safety Planning'. As discussed, the PHA appears to indicate that a smoke plume due to the worst-case fire from the facility may impact some receivers. Further analysis through the RTS is required to verify if impacts at these receptors are credible.
- In this context please addresses the following:
  1. PHA Table 9 indicates that a plume due to the fire scenario "total roof and wall collapse" may reach up to 320 m and identifies land uses within this area. The Applicant should verify these uses and any others in this distance.
  2. Although it is understood that the plume distances in PHA Table 9 are indicative of ground level impacts, to ensure that the SSD complies with the HIPAP 4 risk criteria (cumulative individual fatality, injury and irritation risks), it is requested that the PHA fire plume modelling be refined, taking into account plume rise.
  3. Please provide further justification in using the 0.01 risk reduction factor in PHA Section 5.1 (page 33). Although the factor is understood to be for the "probability of escape at the neighbouring industrial areas", it should be noted that HIPAP 4 Section 2.4.2.1 indicates that exposure duration, vulnerability and ability to take evasive action have already been taken into account in setting the risk criteria for each land use.
  4. Recommendation #1 in PHA Section 6 is noted. Although the intent of the recommendation is understood in terms of public safety (i.e. emergency response procedures for prompt evacuation), a recommendation to impose requirements to existing neighbouring land uses is not practicable from a planning perspective (i.e. consent conditions are Applicant's obligations). As such, the PHA risk consultant could consider revising this recommendation to require the Applicant to prepare a site emergency plan with relevant emergency procedures which includes due consideration of the safety of neighbours.

## **Heritage**

- The Department notes that an ACHAR will be provided. Please included this in the RTS.

## **Biodiversity**

Please respond to EES comments in the RTS.