Visy Dry Recyclables Facility
112 – 120 Euston Road, Alexandria

Additional Information and Response to Submissions

SSD-10364

Prepared for Visy Industries Australia Pty Ltd
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ACHA	Aboriginal Cultural Heritage Assessment (Appendix D)
AQIA	Air Quality Impact Assessment (Appendix B)
ASS	Acid Sulphate Soils
CoS	City of Sydney
DESI	Detailed Environmental Site Investigation (EIS Appendix M)
DPIE	Department of Planning Industry and Environment
DRF	Dry Recyclables Facility
EIS	Environmental Impact Statement (SSD 10364)
EPA	Environment Protection Authority
FCM	Fully Commingled Recyclables Material
FEBQ	Fire Engineering Brief Questionnaire
FER	Fire Engineering Report
FRNSW	Fire and Rescue NSW
GFA	Gross Floor Area
GGA	Greenhouse Gas Assessment (EIS Appendix J)
LEP	Local Environmental Plan
MRF	Materials Recovery Facility
MSB	Mains Electrical Switchboard
NCC	National Construction Code
NVIA	Noise and Vibration Impact Assessment (EIS Appendix H)
OEH	Office of Environment and Heritage
OEMP	Operational Environment Management Plan
PHA	Preliminary Hazard Analysis (Appendix F)
RMS	Roads and Maritime Services
RTS	Response to Submissions (this report)
SEARs	Secretary's Environmental Assessment Requirements
SRZ	Structural Root Zone
TIA	Traffic Impact Assessment (EIS Appendix R)
TfNSW	Transport for NSW
TPZ	Tree Protection Zone

1 Introduction

Visy Industries Australia Pty Ltd (Visy, the applicant) seeks approval for the change of use from a storage warehouse to a waste or resource management facility (the proposed facility) at 112-120 Euston Road, Alexandria in Lot 2 DP 709175 (the site). The development will receive up to 155,000 tonnes per annum (TPA) of recyclable materials from eastern Sydney and other Sydney regions. The incoming materials will comprise of kerbside recycling collections, known as fully commingled material (FCM), and source-separated cardboard and paper from commercial collections.

An Environmental Impact Statement (EIS) was prepared for the proposed facility by Urban Perspectives and Visy in November 2019. The EIS was prepared to address the Secretary's Environmental Assessment Requirements (SEARs) for the proposal, which were issued on 5 September 2019.

The EIS included recommendations for further assessments including for acid sulphate soils and Aboriginal cultural heritage, and these are addressed in the Additional Information section of this report. Ongoing design engineering for the proposed facility since EIS submission has determined some minor modifications to the proposed layout and these are also described and addressed in the Additional Information section of this report.

The EIS was publicly exhibited between 13 November 2019 to 18 December 2019. During this exhibition period submissions were invited from all stakeholders, including members of the community and government agencies. The submissions received comprised:

- A total of 7 submissions from government agencies including councils; and
- A total of 6 submission from public stakeholders, organisations and members of the community.

Matters arising from submissions received during the public exhibition of the EIS are addressed in the Additional Information section of this report and a compilation of submissions and responses is given in the Response to Submissions section of this report.

A draft version of this report was submitted to the Department of Planning, Industry and Environment (DPIE) on 4 February 2020 for initial review. Comments received from the DPIE on the draft report have been addressed in this updated report.

An updated mitigation and management measures summary for the proposed facility is provided in this Response to Submissions (RTS) which supersedes measures presented in the EIS.

2 Additional Information

2.1 Site layout

Ongoing design engineering and consultation for the proposed facility since EIS submission in November 2019 has determined some minor modifications to the proposed layout that are incorporated into the site layout. The Architectural plans for the proposed facility prepared by Archispectrum are presented in **Appendix A**. The plans identify the modifications to the proposed layout and they are described further in this report where required. A summary of the site layout modifications since the EIS and further information in this report is provided in **Table 2.1**.

Table 2.1 Summary of modifications to proposed layout and provision of further information

Modification	Further information
Increase in height of the ventilation stacks from 13 metres to 15.9 metres approximately	Section 2.2
Fire system changes resulting from ongoing consultation with Fire and Rescue NSW including: • Two additional hydrants on Burrows Road; • Relocation of the suction and booster hydrants and sprinkler hydrants on the Euston Road frontage; • Fire Indicator Panel (FIP) to be included at the main entrance on Euston Road	Section 2.5
Inclusion of polymer based clear roof sheeting such as Laserlite in roof panelling	Section 2.9
Inclusion of a Mains Electrical Switchboard (MSB) in the north western corner of the building in stage 1 (and consequent relocation of the internal pathway)	Section 2.10
Retention of the Tallowwood tree in the Euston Road frontage	Section 2.11
Adjustment of the Tree Protection Zone (TPZ) and Structural Root Zone (SRZ) lines on the Euston Road frontage trees	Section 2.12.2
Relocation of the substation for stage 2 from the plans (indicative)	Section 2.11
Removal of the three *Celtis sp* weed trees in the north western corner of the site	Section 2.12
Revised landscape plan	Section 2.12
New pedestrian walkway from the car park to the building entrance	Appendix A

2.2 Air Quality Assessment – $PM_{2.5}$

The EIS Air Quality Impact Assessment (AQIA) identified that further dispersion modelling was required when the final design of the ventilation system and vent locations were complete to ensure that off-site air quality impacts associated with the facility are consistent with the AQIA findings. Further modelling for $PM_{2.5}$ emissions and dispersion has been undertaken by Wilkinson

Murray and the updated AQIA (revC) is presented in **Appendix B**. This AQIA supersedes that provided as part of the EIS lodged in November 2019.

EIS submissions around air quality included DPIE comments about measures to manage residual impacts in line with best practice, EPA comments on the AQIA, and a number of public comments about emissions from the proposed facility as well as general comments about air quality and dust in the local area. **Tables 3.1, 3.2 and 3.3** provide individual responses to each submission comment about air quality.

2.2.1 Air emissions design and modelling

Further design engineering and consultation with air quality consultants (Wilkinson Murray) since EIS submission was undertaken to investigate additional air quality control measures. This has resulted in an increase in height of the ventilation system exhaust vents to approximately in line with the height of the roof ridge line. Updated plans showing the raised exhaust vents are provided in **Appendix A**.

The existing ridge height is approximately 15.45 – 15.65 metres +/- 100mm and was chosen as the approximate exhaust vent height for the following key reasons:

- It is well below the building height limit under the Sydney LEP 2012 of 18 metres;
- It is feasible and practical from a mechanical and structural engineering perspective; and
- It is not expected to cause visual impact considering the scale and massing of the existing building.

The worst-case scenario for hourly emissions presented in the EIS was overt and did not reflect typical worst-case expected for the proposed facility. For example, the AQIA revA used a basis of all mobile plant operating continuously and 10 trucks idling inside the building for up to 15 minutes. This scenario is not realistic given the Traffic Impact Assessment (TIA) determined a peak hour average of 14 trucks and an estimated average time for trucks between weighbridges of 2 minutes (due to the proposed facility design allowing for inbound trucks to transfer waste efficiently under normal operations). As a result, AQIA revC worst-case scenario is refined to reflect typical worst-case emissions for the proposed facility.

2.2.2 Assessment Methodology and Results

The Air Quality and Odour investigation is described in detail in Wilkinson Murray's AQIA Rev C which is included in **Appendix B**. A summary of the findings is provided below.

- Directing air emissions through controlled point sources, ideally at elevated locations, results in better dispersion of pollutants and reduced air quality impacts compared to fugitive emission sources.
- The ventilation exhaust parameters used in the dispersion modelling reflect the final design of the ventilation system, including the three exhaust vent locations, vent height at 15.9 metres above ground level, vent diameter of 1.8 metres and an exit velocity of 5.0m/s.
- The facility design, including one way traffic flow and receival bay unloading areas, means recyclable collection trucks would typically be on site for up to three minutes. Any truck expecting to be stationary beyond a couple of minutes, such as haul trucks being unloaded or recyclable collection trucks waiting to unload, as well as mobile plant not undertaking operation activities would be required to turn off their engines.

- When trucks are operating in the receival bay area, the loader is shut down due to safety reasons. The load factor for the loader has been reduced by 50% to reflect the very light usage of this plant in moving light weight recyclable materials.
- The worst-case hourly scenario is on the basis that all mobile plant is operating continuously and that no trucks are idling inside the building. Pollutant emissions from the mobile plant are higher than those for trucks.
- The predicted ground level concentrations of PM_{10}, NO_2, SO_2, CO and VOC associated with the operation of the proposed facility demonstrate compliance with the impact assessment criteria at all receptors.
- The predicted ground level concentrations of $PM_{2.5}$ associated with the operation of the proposed facility demonstrate compliance with impact assessment criteria at all receptors except the adjacent child care centre. The 100th percentile 24-hour average is a very conservative approach as it assumes that the maximum incremental and background concentrations occur over the same 24-hour period.
- A contemporaneous assessment of 24-hour average $PM_{2.5}$ concentrations was conducted to further investigate potential air quality impacts at the child care centre. This shows that the contribution of the proposal to total $PM_{2.5}$ concentrations is very low and that the proposal does not result in additional exceedances of the impact assessment criterion. As the incremental increase in $PM_{2.5}$ would be largely indistinguishable from the background, specific measures to mitigate $PM_{2.5}$ impacts are not warranted.
- The potential for off-site nuisance odour is assessed based on the unlikely event that a large (20 tonne) load of putrescible waste is unloaded at the facility. The results indicate compliance with the impact assessment criterion.
- Dispersion modelling results indicate that air quality impacts associated with the proposed facility generally comply with the impact assessment criteria. This implies that the proposed ventilation system will achieve effective dispersion of air pollutants.
- Modelling indicates that increasing the stacks [exhaust vents] to 18 metres would reduce pollutant concentrations from the facility at nearby receptors of approximately 10% [compared to the proposed height of 15.9 metres]. This equates to a reduction in the incremental annual average $PM_{2.5}$ at the child care centre from 0.4µg/m^3 to 0.35 µm/m^3. However, as 0.4µg/m3 is already largely indistinguishable from the existing background, an increase in stack heights to 18 metres should be subject to engineering feasibility and cost implications against the scale of impact reduction achieved.

2.2.3 Exhaust vent height assessment

Structural Integrity

Henry and Hymas were requested to provide structural engineering advice for the possibility of increasing the ventilation exhaust vents to include stacks to 18 metres in height. Their advice is provided in **Appendix C** and is summarised as follows:

- Strengthening of some existing trimmer beams and rafters may be required;
- Deflections from increased loading is likely to be in excess of acceptable practical limits to avoid ponding issues, etc;
- It is not recommended to increase the height of the ductwork [ie. exhaust vent stacks] to 18m; and
- If ductwork does need to increase in height to 18m, recommend some strengthening of the rafters be undertaken.

Given the additional strengthening required to the rafters, the potential ponding issues and the minimal benefit to the child care centre from increasing the height from 15.9 metres to 18 metres, Visy does not propose to further increase the exhaust vent height above 15.9 metres.

Visual Impact

The increased height of the three ventilation exhaust vents from 13 metres to 15.9 metres from ground level has the potential for some visual impacts. The vents are 1.8 metres in diameter and are just slightly above the ridge level of the building. Two are side-by-side above the inbound weighbridge fan room on the southern side of the building and one is above the outbound weighbridge fan room on the northern side of the building. The existing façade of the building along both the Burrows Road and Euston Road frontage is at RL20.95 – 16.3 metres above ground level. These aspects are shown in the Architectural plans presented in **Appendix A**.

Given the modest diameter of the exhaust vents and the fact that none are in the western part of the building, it is extremely unlikely that any will be visible from Euston Road. If they were visible from Sydney Park, their extent compared to the rest of the roof, is so small that it will have no perceptible impact on the scale and massing of the building. It is possible that the northern ventilation stack will be visible from Burrows Road on the oblique angle looking through the driveway. It must be recalled that the building is in an industrial zone where flues and ventilation stacks are typically commonplace and expected. However as with Euston Road, the relatively small size, the location within an industrial area, and their location set back from the road frontages means that there will be an imperceptible visual impact on the scale and massing of the building.

2.2.4 Management and Mitigation Measures

The EIS identified a number of management and mitigation measures for air quality, including to turn off stationary trucks and mobile plant when not in use.

Additional management and mitigation measures for air quality following the further design and air dispersion modelling presented in **Appendices A and B** are:

- Increase ventilation system exhaust vent height to 15.9m approximately in line with the existing roof ridge line;
- Include signage directing to turn off engines for stationary trucks and mobile plant when not in use; and
- Include signage directing to turn off engines for recyclable collection trucks if expecting to be stationary for longer than 1 minute.

2.3 Aboriginal Cultural Heritage Assessment

The EIS Heritage and Aboriginal Cultural Heritage Assessment (ACHA) identified a management and mitigation measure to complete the ACHA Report in accordance with the ACHA guidelines to determine and document any Aboriginal cultural heritage items or places located within the site. The ACHA process, has continued since EIS submission in accordance with the guidelines. This includes consultation, a site visit and provision of the draft ACHA to Registered Aboriginal Parties (RAPs) for stage 4 review. The completed ACHA Report is presented in **Appendix D**.

EIS submissions included a DPIE comment to provide the ACHA Report.

2.3.1 Assessment Methodology and Results

The Aboriginal Cultural Heritage Assessment investigation is described in detail in the ACHA Report by Biosis, provided in **Appendix D**. The Archaeological Report provided with the EIS is included in the ACHA Report. A summary of the ACHA is provided below:

- The Aboriginal community was consulted regarding the heritage management of the project in accordance with the process outlined in the DECCW 2010 consultation requirements.
- In Stage 1, relevant Aboriginal stakeholders were identified and a notice was placed in the Inner West Courier on 29 October 2019 inviting Aboriginal people who hold cultural knowledge to register their interest in the community consultation. The following groups registered their interest in the project:
    - Didgee Ngunawal Clan;
    - Kamilaroi Yanuntjatjara Working Group;
    - Wailwan Aboriginal Group;
    - Lex Bewley;
    - Barking Owl Aboriginal Corporation; and
    - Metropolitan Local Aboriginal Land Council.
- In Stage 2, an information pack was provided with details of the proposed development works with the RAPs given 28 days to review and prepare feedback. One comment from the Kamilaroi Yankuntjatjara Working Group was received who noted their support for the proposed methodology.
- During the Stage 3 gather of information about cultural significance, the representative of the Metropolitan Local Aboriginal Land Council attended the field study on 12 December 2019 noting that the site was relatively disturbed both through the construction of the warehouse and the canal that runs through it. His recollection was that the nearest sites of cultural significance were closer to Botany. Lex Bewley advised on the phone that she would like to discuss the placement of potential Aboriginal artwork in the foyer of the building.
- The outcome of the consultation process was that the RAPs considered the study area to have a nil level of cultural significance – no information was provided by RAPs regarding the cultural values of the study area.
- The study area is not known to have any historic associations, no Aboriginal sites or areas of archaeological potential were identified during the assessment and the study area therefore has no scientific significance and no aesthetics significance was recorded during consultation with RAPs or during background research.
- During Stage 4, the draft ACHA was provided to the RAPs on 10 January 2020 and given 28 days for comments, with the consultation period ending on 7 February 2020. Two responses were received during this period. Phillip Boney of Wailwan Aboriginal Group indicated that the Group was in support of the report and had no further comments. Philip Khan of the Kamilaroi- Yankuntjatjara Working Group supported all of the recommendations in the draft report.

Four recommendations that respond to the wishes of the RAPs are made:

- No further archaeological assessment or works are required to be undertaken;
- Should any Aboriginal objects be encountered, works must cease in the vicinity and the find should not be moved until assessed by a qualified archaeologist. If the find is determined to be an Aboriginal object, the archaeologist will provide further recommendations;

- If any suspected human remains are discovered during any activity, immediately cease all work and not further move or disturb the remains, notify the NSW Police and EES, not recommence work at that location unless authorised in writing by EES; and
- Continue to inform the RAPs about the management of Aboriginal cultural heritage sites within the study area throughout the project.

2.3.2 Management and Mitigation Measures

Management and mitigation measures for Aboriginal Cultural Heritage are:

- Note the ACHA Report recommendations and incorporate the requirements into the unexpected finds procedure in the Construction Environment Management Plan.

2.4 Acid Sulfate Soils and Salinity

The EIS soils assessment identified a management and mitigation measure to undertake additional site investigations to determine if the site has acid sulfate soils (ASS) and inform a management plan if required. Investigations for ASS and salinity were undertaken in November 2019 by Douglas Partners and the report is presented in **Appendix E**.

There were no submissions regarding soils or ASS.

2.4.1 Assessment Methodology and Results

The ASS and salinity investigation are described in detail in Douglas Partner's Report on Acid Sulphate Soil and Salinity Assessment which is included in **Appendix E**. A summary of the findings is provided below:

- The investigation included drilling of five boreholes to depths of between 17.2 m and 21.1 m;
- Forty-one samples of soil collected from the five boreholes were tested/screened for preliminary signs of Actual Acid Sulphate Soils (AASS) and Potential Acid Sulphate Soils (PASS);
- Results indicate that AASS are unlikely to be present on the site but that PASS are likely present on the site;
- Twenty PASS samples were further tested and the results indicate that PASS are present in the central and south-east portions of the site, below the water table, at depths ranging from 3m to 11m;
- Soils excavated from above and below the water table should be stockpiled separately and any soils excavated from below the water table should be considered to be PASS and treated with lime to neutralise the acidity;
- An Acid Sulphate Soil Management Plan (ASSMP) will be required for the site and needs to detail how the ASS is to be managed, treated and disposed of or re-used on site;
- Twelve selected soil samples were assessed for soil salinity and results indicate eight are 'non-saline', one is 'slightly saline', and three are 'moderately saline' (although one only marginally so); and
- The risk of 'moderately saline' soils (or worse) being present at the site is low and the main risk associated with potential salinity is considered to be aggressivity of the subsoil and groundwater to below ground concrete and steel structures (which is addressed in the Geotechnical Investigation Report).

2.4.2 Management and Mitigation Measures

Construction

Management and mitigation measures for PASS during construction are:

- Prepare a Construction Acid Sulphate Soil Management Plan (ASSMP) for the site to include detail how the ASS is to be managed, treated and disposed of or re-used on site.

2.5 Fire and Incident Management

The EIS Fire and Incident management assessment identified a Fire Engineering Brief Questionnaire (FEBQ) was lodged with Fire and Rescue NSW (FRNSW) which set out a concept plan subject to final design, coordination and confirmation with FRNSW. The management and mitigation measure identified was to continue the FEBQ consultation process with FRNSW to determine the final design. The FEBQ process has been ongoing with continued consultation with FRNSW regarding FRNSW *Fire Safety in Waste Facilities Guideline*. A summary of consultation is provided in **Table 2.2** below.

EIS submissions around the fire and incident management included DPIE comments that evidence of FRNSW consultation around alternative solutions be provided and City of Sydney (CoS) comments sought to move the fire hydrant boosters to protect the tree protection zone (TPZ) for the southern Euston Road eucalypt (*Corymbia citriodora* (Lemon scented gum)) and the streetscape.

2.5.1 Fire System Design

The EIS identified that the proposed facility is subject to the NSW *Fire Safety in Waste Facilities Guideline* and that extensive consultation with FRNSW and consideration of an effective fire system for the existing building has driven the design, which includes alternative solutions. Fire system design has been ongoing since EIS submission and has included consultation with FRNSW through the FEBQ process (reference: FRN19/2343 and V4: BFS19/4272). However, FRNSW have advised that the FEBQ process is not a matter which should be taken into consideration in the development application assessment.

As evidence of consultation around alternative solutions for the proposed facility, a summary of key consultation with FRNSW is provided in **Table 2.2.** The resulting modifications to the fire system design are summarised in **Table 2.3** for the required fire safety features and one deemed-to-satisfy provision. The resulting revised fire system elements are identified in the Architectural plans presented in **Appendix A**.

Table 2.2 Fire system design consultation with FRNSW summary

Action	Date
FEBQv1 submitted	24 Oct 2019
FRNSW consultation (via meeting)	20 Nov 2019
FRNSW comments FEBQv2	21 Nov 2019
FEBQv3 response and update submitted	20 Dec 2019
FRNSW comments FEBQv4	6 January 2020

Action	Date
Updated design submitted	20 January 2020
FRNSW consultation on alternative solution via phone and email)	28 January 2020
Alternative solution updated design submitted	14 February 2020
FRNSW consultation on alternative solution updated design (via email)	17 February 2020

Table 2.3 Facility Fire Safety Design Changes

Fire Safety Measure	Design Change
Fire Hydrant System	Variations to the standard under a performance solution: ● Hydrants to the north and south elevation may be greater than 50m from a hardstand. Additional requirements: ● Two additional external hydrants, which are in addition to the hydrants to the north and south elevation and therefore are for supplementary coverage purposes, shall be provided on the Burrows Rd elevation, within proximity to the roller shutter doors.
Fire Indicator Panel	The FIP shall be located at the main office entry from Euston Road and provide for the following additional controls: ● Fire services drawings are to be provided at the FIP.
Signage	A 'NO PARKING AT ANY TIME' sign (or similar wording) shall be installed, visible from the driveway accessing the hydrant/sprinkler booster, with lettering in at least 30mm height with a colour contrasting with the background.
Fire hydrant, booster and FIP provisions	Proposed alternative solution: Booster and FIP location ● The hydrant booster and sprinkler booster location and arrangement is revised to account for Euston Road median, allowing emergency appliance access and at least one lane traffic flow on property side.

Further assessments to support the fire system design as part of the FEBQ process are summarised as follows,

Hydrant flow:

- Assessment of proposed hydrant flow of 20 L/s confirms this is consistent with expectations established from the Fire Brigade Intervention Model (FBIM) as to providing a suitable degree of water for the fire sized anticipated.

Design fire sizes:

- Evaluation of a corner design fire at the proposed location of plastic bale storage has been completed.
- Quantitative assessment to determine the Required Safe Exit Time (RSET) value has been completed and numbers in FER will be updated.

As a result of the shift of the hydrant and sprinkler boosters the possible impacts within the TPZ of the southern Lemon scented gum are assessed to be 'low impact' (Section 2.12.2). It is possible that final design of the boosters may require a slight adjustment to the position of

these hydrants, to ensure appropriate access for fire trucks. However any adjustments will prioritise the commitment to ensure not greater than 'low impact' to existing Euston Road trees.

2.5.2 Management and Mitigation Measures

Further management and mitigation measures may arise as part of the final fire system design determined through the FEBQ process.

2.6 Preliminary Hazard Analysis

EIS submissions around the Preliminary Hazard Analysis (PHA) included DPIE comments to further address smoke plume modelling, justify the 0.01 risk factor around escape and revise the recommendation to be more practical from a planning perspective. Further hazard modelling and information has been undertaken by Pinnacle Risk Management and an updated PHA (revE) is presented in **Appendix F**. This PHA supersedes that provided as part of the EIS lodged in November 2019.

2.6.1 Assessment Methodology and Results

The assessment is described in detail in Pinnacle Risk Management's report which is included in **Appendix F**. A summary of the key findings from the updated report is provided below:

- The risk criteria for fatality and injury in residential and other sensitive areas are satisfied for radiant heat from fires;
- The criterion for industrial propagation risk is qualitatively determined to be satisfied for fire events. The use of a probability of escape of 0.01 is justified based on demonstrating the time elapsed before flames start to break through the roof and a person not credibly remaining in the same position during this time;
- The smoke plume rise modelling shown in Figure 8 (of **Appendix F**) indicates the lowest predicted plume level at 280m to be approximately 125m and the centreline at approximately 225m. The nearest residence is approximately 285m to the north across Sydney Park;
- The plume rise modelling shows that for all wind/weather conditions there are no known nearby buildings that can be expected to be impacted by the smoke plume given the estimated plume heights;
- The risks associated with the proposed facility have been assessed and compared against the risk criteria and determined to be acceptable. Aircraft and other external events are not found to pose any significant risk given the proposed safeguards. The development does not make a significant contribution to the existing cumulative risk in the area. Consideration of societal risk finds that the risk of fatality does not extend significantly off the site and the concept of societal risk applying to adjacent populations is therefore not applicable to the facility; and
- It is recommended to include contact numbers in the emergency response plan for businesses in the adjacent development to the north at 95 Burrows Road that are in immediate proximity (ie. in the south-west portion of the development) or sensitive receivers (i.e child care facility) and the business in the adjacent building to the south. This will allow Visy to provide warning if a fire occurs.

2.6.2 Management and Mitigation Measures

The additional management and mitigation measures for hazards and risks beyond those identified in the EIS are:

- Note the revised recommendation for the emergency response plan to include contact details of potentially impacted neighbouring businesses and sensitive receivers.

2.7 Traffic Matters

2.7.1 Potential Traffic Conflict with Bingo Site

EIS submissions around the traffic included DPIE's comment to further address the potential for traffic conflict with the existing Bingo/Dial-a-dump site opposite the site on Burrows Road. A traffic survey of the existing facility and assessment of potential conflict was undertaken by Traffix and results provided in a letter of advice presented in **Appendix G**.

2.7.2 Assessment Methodology and Results

The survey results and advice is described in detail in Traffix's letter which is included in **Appendix G**. A summary of the key findings is provided below:

- Surveys of the opposing Bingo access driveway was undertaken on Tuesday 19 November 2019, during the typical morning peak period between 7:00am to 9:00am. The counts indicate:
    - The Bingo access driveway is 'entry only', with 2 exit movements being illegal and not considered when analysing the potential conflict; and
    - A maximum of 37 movements were recorded in any hour.
- The driveway of the proposed facility is 'egress only' which is opposite to the 'entry only' of the Bingo site and therefore removes all potential conflict of two vehicles exiting either site at the same time;
- The volumes are considered moderate and consistent with a private development of this scale, remaining well below what is experienced at a typical public road intersection;
- In the context of the proposed development, the localised impacts on Burrows Road are otherwise expected to be minimal for the following reasons:
    - The location of the subject property and Bingo Site is midblock on Burrows Road, approximately 250 metres from the nearest public road intersection at Huntley Street. Software modelling undertaken in the Traffic Impact Assessment (TIA) demonstrates that the site accesses are sufficiently offset from queuing at this intersection;
    - Exiting trucks at the subject site will by default give way to all traffic on Burrows Road, including giving priority to vehicles entering the Bingo site. As such, queuing will only occur for exiting trucks from the proposed facility and not impact the local traffic on Burrows Road. Swept path analysis is not required as there are no conflicting movements to occur on Burrows Road as part of the proposed facility;
    - The proposed development will have typical truck numbers exiting the site between the surveyed morning peak period of 7:00am to 9:00am of 27 trucks (Appendix H) and in the afternoon peak period of 2:00pm to 4:00pm of 15 trucks (noting this does not coincide with the network evening peak period). Therefore, during the critical morning peak period, this equates to one additional vehicle every four minutes. Accordingly, the increases in traffic

volumes on the road network in the vicinity of the site are expected to be marginal and within the typical fluctuations in background traffic volumes; and
- The localilsed impacts on Burrows Road are expected to be minimal, with adequate gap acceptance available due to the midblock location of the site.

2.7.3 Visy St Peters Truck Movements Table

The Traffic Impact Assessment (TIA) presented with the EIS included data on truck movements at Visy's existing facility at 6-10 Burrows Road South, St Peters in Table 2 (and reproduced in the EIS in Table 15.3). Typographic errors in the trucks column of this table were identified and the table is revised. The corrected Table 2 of the TIA (and Table 15.3 of the EIS) is presented in Traffix's letter which is included in **Appendix H**. This supersedes the same table in the TIA and EIS. A summary of the survey and corrections is provided below:

- The truck entry and exit data for the St Peters facility was surveyed over a two-week period which calculated the total entry and exit movements per hour (during the weekday);
- The highest number of total movements for each hour was selected, after filtering vehicles with a payload exceeding 300kg, as smaller payload vehicles will not be accepted at the proposed facility, to determine the maximum traffic generation of the existing development in St Peters;
- Table 2 in the TIA had some typing errors in the trucks only column and these have been corrected as identified with an asterix in **Appendix H**; and
- Table 2 data in the movements column is accurate and has not been amended, therefore the intersection modelling is unaffected by the errors.

2.7.4 Management and Mitigation Measures

The EIS identified a number of management and mitigation measures for traffic including site design and one-way traffic flow aimed at providing efficient truck movement and minimising time onsite for trucks.

Following the further survey and assessment for potential conflict with the Bingo facility located opposite on Burrows Road, it is determined that there is no potential conflict with the proposed facility exit driveway and the Bingo facility entry driveway that will impact the flow of traffic on Burrows Road. Therefore no additional management and mitigation measures for traffic are proposed beyond those already identified in the EIS.

2.8 Waste contingency

EIS submissions around waste management included DPIE comments to include a waste contingency management plan as a management and mitigation measure.

The EIS provided an overview of how incoming FCM will be managed during Materials Recycling Facility (MRF) down-time of various lengths from short-term through to long-term and how incoming paper/cardboard will be managed during baler down-time.

No further assessment around waste management is required to address the EIS submissions.

2.8.1 Management and Mitigation Measures

The additional management and mitigation measures for waste management beyond those identified in the EIS are:

- Prepare a Contingency Waste Management Plan (CWMP) as part of the OEMP to include procedures in the event of processing down-time.

2.9 Roof Materials

The EIS identified under Construction of the Facility, Stage 1 construction works (EIS section 2.3.1) that stage 1 works include replacement of the roof with light coloured metal sheet material. Ongoing design for the proposed facility since EIS submission has identified that the inclusion of clear/translucent panels in the new roof in line with those present in the existing roof is an opportunity to incorporate sustainable building design and energy efficiency principles to the proposal. Updated plans for the roof are provided in **Appendix A**.

Clear panels made from polymer based clear or translucent roof sheeting such as Laserlite are proposed to be included in the new roof to provide natural lighting into the operations area. The clear panels will be placed at the spacing shown in the updated plans. It is envisaged this could reduce the use of internal electrical lighting during daytime operation.

It has been confirmed that the inclusion of these proposed clear roof panels does not present an issue with regard to both BCA and FEBQ requirements.

2.10 Mains Electrical Switchboard

Ongoing design for the proposed facility since EIS submission has identified the need to include a new upgraded mains electrical switchboard (MSB) as part of stage 1 construction works. This was not identified in the EIS Stage 1 construction works (EIS section 2.3.1). Updated plans showing the location of the new MSB in the north western corner of the building are provided in **Appendix A**.

The new upgraded MSB is required in order to distribute power to the essential fire safety services for the proposed facility, for example fire pumps, sprinklers and mechanical smoke vents. The existing MSB is not adequate to service the required new fire safety system which requires provision to trigger fire safety services and to continue to operate in the event of fire. For example, the existing MSB has no provision to trigger sprinklers because there are no existing sprinklers installed while the new upgraded MSB will have provision to trigger sprinklers based on fire detection and to then shut down the new mechanical smoke vents.

The new MSB will comprise two aspects being, non-essential services (i.e. light and power) and essential services (i.e. fire services provisions that need to run in event of fire and continue to run). As a result, it will be a larger board compared with the existing MSB and will require a larger space in accordance with Ausgrid requirements. The MSB will be located in a 2 hour fire rated room to comply with BCA requirements and will be elevated above the 1% AEP level in accordance with a flooding mitigation control for the proposed facility as identified in the EIS.

2.11 New kiosk location

EIS submission from CoS includes comment that the proposed removal of one eucalypt from Euston Road for a new substation kiosk under stage 2 is not supported, with several trees already removed for unrelated road widening. CoS considers the loss of another tree to accommodate the new substation is unacceptable and considered avoidable.

Visy has sought preliminary advice from the electrical engineer regarding relocating the new substation to the location shown in the site layout in **Appendix A**. The advice provided by Northrop Consulting Engineers is presented in **Appendix I** and advises that the kiosk can be moved as long as there are no other services beneath it.

As part of detailed design engineering for stage 2 of the proposed facility, Visy will work with electrical engineers, Ausgrid and liaise with suitably qualified arborists and CoS to confirm a location for the stage 2 new substation kiosk that will minimise impact on existing high retention value vegetation.

The revised Architectural plans for the proposed facility presented in **Appendix A** identify that the Euston Road eucalypt is to be retained. The management and mitigation measures for biodiversity is updated as described below to retain all substantial existing planting along Euston Road.

2.12 Landscaping

EIS submissions around landscaping and tree removal included, in summary:

- CoS comments that the proposed tree removal of four casuarinas on Burrows Road is an opportunity for landscaping plans that double the tree canopy from present between the Burrows Road driveways (subject to acceptable sightlines), that the proposed removal of one eucalypt on Euston Road is not supported, and the Euston Road fire system boosters location should be refined to protect the tree protection zone and streetscape; and
- Environment, Energy and Science (EES) comments included that the three existing *Celtis sp* onsite are a weed of regional concern and recommended they be removed, and the landscaping plans should improve urban tree canopy and local habitat by replacing removed trees at ratio of >1:1 with local provenance native plant species given enough area to allow trees to grow to maturity.

2.12.1 Landscape Plan

Visy engaged a professional landscape architectural consultancy, Zenith Landscape Designs, to develop a revised landscape plan to meet the submission comments as far as reasonably practicable. The revised landscape plan prepared by Zenith Landscape Designs is presented in **Appendix J**. This proposed Landscape Plan supersedes that provided as part of the EIS lodged in November 2019.

To guide the development of a revised landscaping plan to meet the various aspects of the EES comments as far as practical, they were broken into separate aspects and prioritised as follows:

1. *Celtis sp* be removed.
2. Landscape plan uses a new tree, shrubs and lawn to compensate tree removal.
3. To mitigate urban heat island effect and improve urban tree canopy and local habitat.
4. Provide enough area to allow trees to grow to maturity.
5. Use advance and established trees preferably with pot size 75-100 L or greater if commercially available.
6. Replacement by local native provenance species and any impacted fauna should be relocated.
7. Provide information on native vegetation community that once occurred in this locality and demonstrate landscaping plant species is from this community.

The proposed landscape plan presented in **Appendix J** uses tree species selected from CoS Street Tree Masterplan and understorey species from CoS native plant list that were likely part of the indigenous vegetation community. It was advised that specifically meeting 'local provenance' species would be "almost impossible to find a genetically suitable host site from which to gather seed or cuttings to grow stock." Additionally, the time required to achieve

plants ready for planting could be lengthy. As such, further information on historical vegetation for this locality is not pursued further as part of this proposal assessment.

The landscape plan is summarised as follows:

- Removal of three *Celtis sp* in north-west corner of site and direct replacement planting of one *Malaeleuca quinquenervia* (Broad Leaf Paperbark) and three *Casuarina glauca* (Swamp She-Oak), located a minimum of 3m clear of all site easements;
- Planting of indigenous understorey (*Lomandra longifola* (Mat Rush) and *Dianella caerulea* (Flax Lily)) below existing Fig tree along Euston Road boundary to increase habitat value and indigenous biodiversity of site landscaping and improve streetscape;
- Extensive landscape planting on Burrows Road to compensate for removal of four *casuarina glauca* for new driveway using minimum of seven indigenous trees located a minimum of 4.5m from building, comprising:
    - Two street trees of *Angophora costata* (Sydney Red Gum);
    - Five *Corymbia eximia* (Yellow Bloodwood);
    - Variety of native shrubs, rushes and lilys; and
    - Lawn of Soft Leaf Buffalo Turf.

2.12.2 Euston Road tree impact assessment

The plans in **Appendix A** have corrected the illustrated Structural Root Zone (SRZ) and Tree Protection Zone (TPZ) for the three trees on the Euston Road frontage which had been inaccurately illustrated using the measurements as a diameter rather than a radius.

The EIS Arboricultural assessment defines four impact categories as:

- **High impact:** The SRZ is directly affected or the proposed encroachment is greater than 20% of the TPZ. Trees may not remain viable if they are subject to high impact.
- **Medium impact:** If the proposed encroachment is greater than 10% of the TPZ (but less than 20% of the TPZ) and outside of the SRZ, the project arborist may require detailed root investigation to demonstrate that the tree(s) would remain viable.
- **Low impact:** If the proposed encroachment is less than 10% (total area) of the TPZ, and outside of the SRZ, detailed root investigation should not be required.
- **No impact:** No likely or foreseeable encroachment within the TPZ.

The 10% encroachment into TPZ is illustrated in the Arboricultural assessment with the figure shown in **Figure 2.1**.

Appendix B Encroachment into tree protection zones - AS 4970-2009

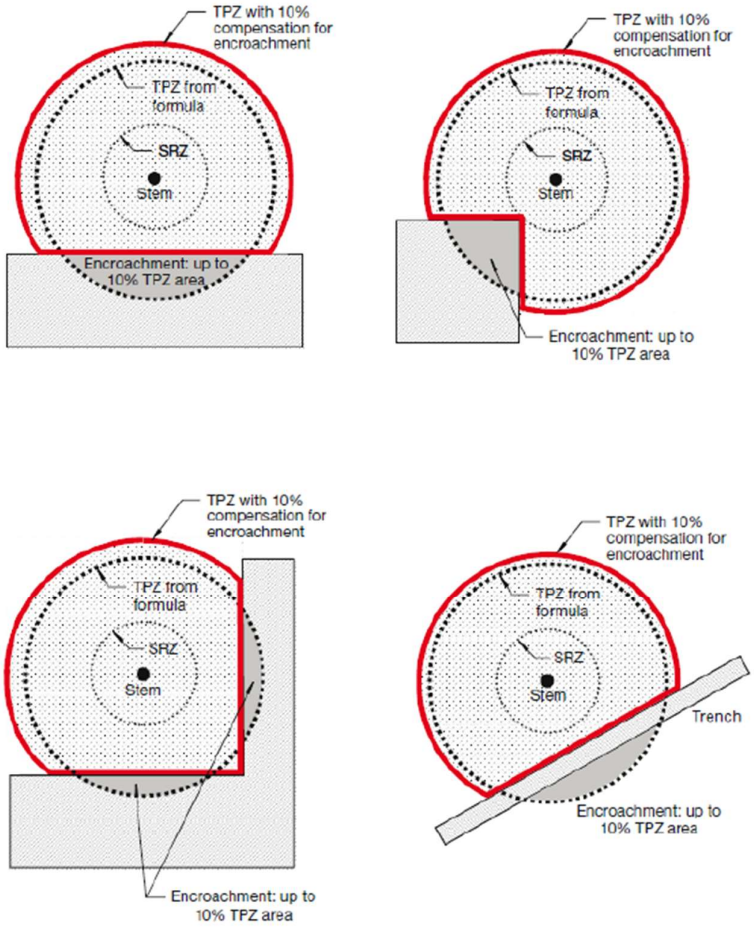

Figure 2.1. Encroachment into tree protection zones from EIS Aboricultural Assessment

Tallowwood

The landscape plan retains the *Eucalyptus microcorys* (Tallowwood) on Euston Road. The stage 2 new substation kiosk will be located so that it will achieve not more than 'low impact' on the Tallowwood.

Lemon scented gum

The plans in **Appendix A** illustrate a relocated position of the fire system hydrant and sprinkler booster which intrudes less on the TPZ of the *Corymbia citriodora* (Lemon scented gum) on Euston Road than the original plans accompanying the EIS. The impact on the TPZ will be 'low impact'.

2.12.3 Management and Mitigation Measures

The management and mitigation measures for biodiversity have been revised to include:

- Retain all substantial existing plantings along Euston Road and ensure not greater than 'low impact'; and
- Introduce new landscaping in the north-western corner of the site to replace three *Celtis sp* trees to be removed.

2.13 MRF elevation layout

EIS submission from CoS includes comment that the form and layout of the proposed stage 2 MRF mezzanine floor is not clearly illustrated and that if the mezzanine floor is additional gross floor area, then the total area must be noted, plans provided accordingly and developer contributions payable.

The EIS section 2.2.5 included a brief description of the stage 2 MRF layout within the facility as, "*The stage 1 layout simply sets aside a future MRF area to be occupied by the stage 2 MRF, which include an elevated mezzanine level.*"

While the site layout plan identifies the area set aside for the MRF, the description is not entirely clear. The MRF layout will allow for movement of forklifts beneath, however it is not an unbroken mezzanine floor area and is better described as a series of elevated platforms for plant with connecting walkways and stairs. This style of MRF design provides for efficiency of material movement through the MRF by making use of gravity to assist in moving material through the process.

By way of example, pictures of Visy's Smithfield MRF showing the elevated plant and connecting walkways are shown in **Figure 2.2**. This MRF design reflects that envisaged for the proposed stage 2 MRF. Also, the EIS MRF process description (EIS 2.2.8) includes the following phrases which illustrate the use of gravity to assist movement of materials through the separation and recovery process:

- inclined rotating cylinder [where small items] fall through onto a conveyor while larger items are driven by gravity down the inside and fall out the end onto a separate conveyor;
- inclined conveyor [where] light, two dimensional items climb the bouncing conveyor to the top while dense, three-dimensional items roll down and fall onto a separate conveyor; and
- chamber of rising air [where] light materials are blown upwards and separated from heavy material that falls out the bottom.

The raised MRF facility is not located on a 'mezzanine floor' as defined in Sydney LEP 2012, i.e. – 'an intermediate floor within a room'.

It is estimated that less than 10% of the MRF area will be walkways and steps, the rest will be machinery including conveyors. Consequently, it could not be described as additional gross floor area within the LEP definition.

Figure 2.2. MRF layout at Visy Smithfield showing elevated plant platforms connected by walkways and stairs for access and conveyors for material transport.

2.14 Solar panels

EIS submission from CoS includes comment that the roof replacement presents an opportunity for a solar panel array to be installed on the warehouse roof in order for the facility to reduce its network electricity consumption and at very least, that the north roof should be covered in solar panels.

Visy has invested in numerous clean energy projects that reduces its dependence on electricity generated from fossil fuels. These include a number of energy plants that turn residual waste from its manufacturing operations into energy to power its paper mills and, most recently, a 2.13mW commercial solar/storage installation at one of the Visy Board sites. An overview of this solar project is available via the website https://www.energyaware.com.au/projects.

Visy has sought preliminary analysis regarding the existing steel frame capacity to support a roof solar installation. The structural engineering undertaken to date for the proposed facility has been focussed on works to ensure the existing steel framing of the aging warehouse building (circa 1970s) is able to support the weight of key installations required for the facility by the Building Code of Australia (BCA) and as fundamental controls to mitigate fire and air emissions, being:

- new sprinkler fit out throughout whole warehouse; and
- new ventilation system comprising 3 fan units.

Henry and Hymas were requested to undertake preliminary analysis for structural engineering around the possibility of a solar roof installation using commercial solar panel specifications provided by Australia Wide Solar. Their advice is presented in **Appendix K** and is summarised as follows:

- Both purlins and rafters will be working hard strength-wise but appear to have sufficient strength to support the solar panels;
- There will be an issue however with deflection with all members;
- The deflection in the purlins will likely exceed acceptable standards and may result in possible ponding/water ingress issues;
- Rafters on the northern side of the ridge will also likely exceed acceptable deflection limits;
- The preliminary analysis assumes the entire section of roof is loaded, which is slightly conservative but any refinement of the loading is not expected to make a significant difference; and
- It is advised that the existing roof structure will require strengthening works in order to sufficiently support the loading of the possible solar roof installation.

It is also relevant to note that an energy efficiency assessment of the proposed facility is being undertaken by Uema electrical in line with BCA section J requirements and a solar panel installation would be additional to this current energy efficiency compliance.

Visy has concluded that a roof solar installation is not feasible for the proposed facility due to the age of the existing warehouse steel structure and the priority for it to support BCA required new equipment.

3 Response to Submissions

3.1 Introduction

The EIS was placed on public exhibition from 12 November 2019 to 18 December 2019 and attracted a total of 13 submissions. Three were received from the public, three from organisations and seven from public authorities. Five of the thirteen submissions expressly objected to the proposal – three from neighbours and two from the public. A summary of issues raised in the submissions and Visy's response is included in three summary tables contained in Sections 3.2, 3.3 and 3.4.

3.2 Public Authority Submissions

Seven public authorities lodged submissions in response to the exhibition of the EIS, including:

- Department of Planning Industry and Environment
- City of Sydney
- Department of Primary Industries
- Environment Energy and Science Group
- Environment Protection Authority
- Transport for NSW/Roads and Maritime Services
- City of Waverley
- Department of Planning, Industry and Environment

Table 3.1 - Summary of Public Authority Submissions and Response

Item	Specific Issue	Response	Reference
	Department of Planning, Industry and Environment		
	Traffic and Swept Paths		
PA1	Truck movements in Table 15.3 and Table 2 of the TIA do not reflect all trucks entering and exiting the site. Please update the table.	Both tables referenced are a summary of typical truck movements at Visy's existing facility at 6-10 Burrows Road in St Peters which was surveyed over a two-week period to obtain the shown data. It is identified that this survey data was used to extrapolate truck movements serviced by the proposal. Expected truck movements for the proposal per hour during peak periods are quantified in section 6.2.2 of the TIA and in Table 15.4 of the EIS. An overview summary of all trucks entering and exiting the site is given in Table 2.1 and Table 2.2 of the EIS. Notwithstanding, Table 2 of the TIA (and therefore also Table 15.3 of the EIS) is revised to correct some typing errors in the trucks column and to include totals for each column for clarity. This is presented in **Appendix H.** The revision to trucks numbers has no impact on the TIA modelling which uses truck movements and these are not changed.	TIA 4.2 and EIS 15.2.2 TIA 6.2.2 and EIS 15.2.2 Appendix H
PA2	Section 15.2.2 of EIS reference peak period of 9am to 10pm. This should be 10am. In addition, the 8am to 9am should show same number of movements. Peak hours should consider referencing both peak hours.	Acknowledged, the peak period should read 9am to 10am. As described at items PA1 and PA3, the movements are actual survey data and reflect that not all trucks enter and exit within the hour. Therefore, the truck movement do not need to be revised to show the same number of movements as this does not reflect the actual survey data.	EIS 15.2.2
PA3	Section 15.2.2 of EIS the 3pm to 4pm peak hour should have 16 movements assuming all vehicles enter and exit the site.	The 15 movements in the hour is extrapolated from Visy's existing St Peters facility survey data. This is the maximum traffic generation during the afternoon peak over the two week period surveyed. Not all trucks enter and exit within the hour and therefore some hours do have an odd number of movements. As a result, the truck movements for the hour do not need to be revised to an even number.	TIA 4.2 and Appendix H

Item	Specific Issue	Response	Reference
PA4	Section 6.2.1 of TIA states 26 staff in three shifts, however, TIA assumes 26 vehicle trips/hour during the AM peak period and 26 vehicle trips/hr during the PM peak period. Specify whether this is during the road peak traffic or the site peak traffic as is noted in section 4.2 that 26 staff are between 6am and10pm.	The TIA determined the net traffic generation for the proposed facility using hourly heavy vehicle numbers from the facility peak periods between 6:00am to 10:00am and 3:00pm to 7:00pm and staff vehicle numbers the total staff numbers. This provides a worst-case scenario with all 26 staff arriving and departing within each peak hour which would not occur under normal circumstances as the staff work across three shifts. Software modelling to assess intersection performance then used the worst-case net traffic generation for the proposed facility together with survey results of existing traffic for the road network peak periods of 7:00am to 9:00am and 4:00pm to 6:00pm.	TIA 6.2 TIA 6.4
PA5	Section 6.2.1 of TIA states three shifts, however section 4.2 describes two shifts. Confirm if multiple shifts and explain why 26 trips expected during peak times i.e. if this represents worst-case scenario this should be stated as well as what would be a typical scenario.	The proposed facility will be staffed in 3 shifts, being: 1. 6am-2pm 8 production staff 2. 2pm-10pm 8 production staff 3. 10pm-6am 2 production staff In addition there will be 8 office staff at the site each working an 8 hour day between the hours of about 7am-5pm. It is acknowledged that Section 4.2 of the TIA should reference 26 total staff across the three shifts plus office staff as explained. As per item PA4, this total staff number is used to assess the worst-case trip generation for staff vehicles.	
PA6	Hard to reconcile Table 15.3 and Table 15.4 of EIS. Consider setting out all traffic movements in a single table and ensure reference to traffic movements are consistent.	As above at item PA1, Table 15.3 provides a summary of typical truck movements at Visy's existing facility at 6-10 Burrows Road in St Peters used in the TIA to extrapolate truck movements serviced by the proposal. Table 15.4 provides the identified vehicle trips for the proposal per hour during road network peak periods. It is a summary of the information provided in the TIA section 6.2. A table of all daily traffic movements hourly is not provided. An overview daily summary of trucks entering and exiting the site is given in Table 2.1 and Table 2.2 of the EIS.	TIA 6.2
PA7	During site visit 25/10/2019 heavy traffic on Burrows Road was observed, including trucks turning right into Bingo/Dial-a-dump site adjacent.	A traffic survey of the opposing Bingo access driveway during the morning peak period (7.00am to 9.00am) and assessment of potential traffic conflict concluded that: ● The driveway of the proposed facility is 'egress only' which is opposite to the 'entry only' of the Bingo site and therefore removes all potential conflict of two vehicles exiting either site at the same time;	Appendix G

Item	Specific Issue	Response	Reference
	Provide a cumulative impact assessment, including swept path diagrams, to demonstrate there are no conflicts due to the two facilities operating in close proximity. May include some consultation with site operator and CoS to ensure trucks able to manoeuvre safely and there will not be queuing on the local road network.	• Exiting trucks at the proposed facility will by default give way to all traffic on Burrows Road, including giving priority to vehicles entering the Bingo site. As such, queuing will only occur for exiting trucks from the proposed facility and not impact the local traffic on Burrows Road. Swept path analysis is not required as there are no conflicting movements to occur on Burrows Road as part of the proposed facility; and • The localilsed impacts on Burrows Road are expected to be minimal, with adequate gap acceptance available due to the midblock location of the site. Therefore, a cumulative impact assessment for the two facilities is contended to be not relevant and, in addition, not practical because it would require a level of truck movement data from the adjacent site operator that has proved not feasible to obtain. Note that Visy has made efforts to consult with the site operator as requested but without practical success.	
	Air Quality		
PA8	Noted AQIA predicts exceedances for $PM_{2.5}$ at nearby sensitive receivers, notwithstanding proposal has low incremental contribution and not expected to cause additional exceedances of 24-hour $PM_{2.5}$ concentrations. Describe any mitigation measures included to ensure residual impacts are managed in line with best practice.	The EIS identifies mitigation measures including a vehicle exhaust system for the fully enclosed building that provides point source air emissions via three roof vents. This improves the dispersion of pollutants from the facility. The revised AQIA demonstrates that the proposal has an even smaller contribution to air pollutant concentrations at nearby sensitive receptors. Notwithstanding the already very low incremental contribution to $PM_{2.5}$ from the proposed facility, the AQIA identified increasing the roof vent height from 13 metres to 15.9 metres will further reduce the $PM_{2.5}$ contribution.	RTS 2.2 Appendix B
PA9	Respond to EPA's comment on air quality in RTS.	Refer to response in EPA section.	

Item	Specific Issue	Response	Reference
PA10	A number of nearby receivers, including neighbouring businesses and the childcare centre raised concerns about impacts on air quality and human health. Address these concerns directly.	The AQIA for the Proposal has been conducted in accordance with the Approved Methods and SEARs and identifies all relevant air pollutants associated with the Proposal and establishes existing ambient air quality in the vicinity of the Proposal. The revised AQIA demonstrates that the Proposal has a very small contribution to air pollutant concentrations at nearby sensitive receptors.	RTS 2.2
	Waste		
PA11	Contingency management plan required in the management and mitigation measures.	The EIS provided an overview of the contingency waste management plan for the proposed facility but this was not captured as a management and mitigation measure. A Contingency Waste Management Plan will be developed for the proposed facility as a management and mitigation measure	RTS 2.8 and Table 4.1
	Fire		
PA12	As the proposal includes alternative solutions, Fire & Rescue NSW must be consulted and evidence of this consultation provided.	FRNSW has been consulted throughout the development of the proposal through the FEBQ process.	RTS 2.5
	Hazards		
PA13	Appropriately conservative approach was adopted in submitting a preliminary hazard analysis (PHA). The PHA appears to indicate smoke plume due to worst-case fire from facility may impact some receivers. Further analysis to verify if impacts at these receptors are credible.	As described in the below two rows, the revised PHA includes further analysis with modelling that takes into account plume rise. This shows that there are no known receivers that can be expected to be impacted by the smoke plume given the estimated plume heights.	Appendix F RTS 2.6
PA14	PHA Table 9 indicates plume may reach 320m and identifies land uses within this area.	The revised PHA plume modelling that takes into account plume rise identifies that at 300m from the edge of the fire, the lowest predicted plume height will be approximately 130m, with the plume centreline at approximately 240m high. There are no known	Appendix F RTS 2.6

Item	Specific Issue	Response	Reference
	Verify these uses and any other in this distance.	nearby buildings that can be expected to be impacted by the smoke plume given the estimated plume heights. As a result of the revised plume modelling, the downwind emergency response identified in the EIS has been superseded with no specific action required. Therefore it is no longer relevant to verify specific land uses within a 300m radius of the proposed facility.	
PA15	Although PHA Table 9 plume distance indicative of ground level impacts, SSD should comply with HIPAP 4 risk criteria. Request that PHA fire plume modelling be refined, taking into account plume rise.	As above, the plume modelling has been refined to take into account plume rises for all wind/weather conditions.	Appendix F RTS 2.6
PA16	Provide further justification in using the 0.01 risk reduction factor in PHA section 5.1, noting factor details in HIPAP 4 Section 2.4.2.1 around exposure and evasive action already taken into accounts in setting risk criteria for each land use.	The revised PHA (Appendix F) provides additional information describing the development of a warehouse/industrial building fire and justification to using the 0.01 risk that, considering the development of a fire event, a person will not remain in the same position over an extended period of time for the building walls to fail, therefore a probability of escape of 0.01 is applied.	Appendix F RTS 2.6
PA17	PHA recommendation #1 noted and intent understood in terms of public safety. However, imposing requirements to existing neighbours is not practicable from planning perspective. Consider revising recommendation to require a site emergency plan with relevant emergency procedures which include due consideration of neighbour's safety.	The PHA recommendation has been revised (Appendix F) to ensure implementation of the intent is practical. The management and mitigation measure to follow the PHA recommendation for emergency response procedures remains, with the contact details of businesses in the adjacent developments in immediate proximity and the child care centre to the proposed facility to be included. This is also in line with Visy Health Safety and Environment procedure for a site emergency response plan.	Appendix F RTS 2.6 RTS Table 4.1

Item	Specific Issue	Response	Reference
	Heritage		
PA18	Provide Aboriginal Cultural Heritage Assessment (ACHA) with RTS.	The draft ACHA Report prepared by Biosis underwent the stage 4 review with RAPs in accordance with the ACHA guidelines. The final report is in Appendix D of this RTS. The Aboriginal community was consulted regarding the heritage management of the project throughout its lifespan. The ACHA concludes that within the study area there are no Aboriginal cultural heritage sites that may be subject to harm. Therefore, works associated with the proposal impacting on any sites is negligible to low.	Appendix D RTS 2.3
	Biodiversity		
PA19	Respond to EES comments in RTS.	Noted. Refer to comments under EES heading in this section.	Section 3.1
	City of Sydney		
	Tree Removal		
PA20	Proposed removal of four casuarinas from Burrows Road for new entry driveway under stage 1. Tree removal contrary to City's ambitions (Urban Forest Strategy 2013) and there is opportunity to increase canopy between proposed driveways. Request plans that double the tree canopy from present, subject to maintaining acceptable sightlines from northern driveway and respecting utilities.	A revised landscape plan has been prepared by a professional landscape architectural consultancy (Zenith Landscape Designs) and forms part of this RTS. It meets the requirements of CoS and EES in removing the three *Celtis* sp trees and other requirements as far as reasonably practical	RTS 2.12 Appendix I
PA21	Proposed removal one eucalypt from Euston Road for new substation kiosk under stage 2. City does not support this tree removal, acknowledging several	Visy acknowledges CoS's concern and objection to the proposed removal of the eucalypt, which has a high retention value. Visy has received preliminary advice that the kiosk can be moved to an alternative location as shown in Appendix A as long as there are no other services beneath it. Final design for the location will be confirmed during stage 2 detailed design and CoS	RTS 2.11 and 2.12.1 RTS Table 4.1 Appendix A and H

Item	Specific Issue	Response	Reference
	trees already removed for road widening. Loss of another tree to accommodate new substation is unacceptable and opined as avoidable. New substation could be relocated. If necessary, liaise further post consent to reach a suitable outcome.	consulted. Consultation with Ausgrid confirming an appropriate location is also necessary. The proposed facility site layout provided in Appendix A shows that the Euston Road Tallowwood eucalypt is to be retained.	
PA22	Location and design of fire hydrant boosters should be further refined to protect the tree protection zone and streetscape. If necessary, liaise further post consent to reach a suitable outcome.	The fire hydrant and sprinkler booster location have been moved to a more southerly location and will encroach not more than 10% into the TPZ and not within the SRZ, which is a low impact.	RTS 2.5, 2.12.2 Appendix A
	Solar Panels		
PA23	Roof replacement presents opportunity for solar panel array and reduce network electricity consumption. At very least, north roof should be covered in solar panels.	A preliminary analysis was undertaken to determine feasibility for a solar panel installation for the existing warehouse given its aged steel structure and priority requirements to support new fire safety building code equipment. The analysis indicates that the purlins and rafters would be working hard strength-wise and are likely to exceed acceptable deflection limits and may result in possible ponding/water ingress issues. Therefore, it is concluded that a roof solar installation is not feasible for the proposed facility due to the age of the existing warehouse steel structure and the priority for it to support BCA required new equipment.	RTS 2.14 Appendix K
	Mezzanine Floor		
PA24	Form and layout of proposed mezzanine floor not clearly illustrated. If mezzanine floor is gross floor area, then total area must be noted and plans provided accordingly.	The raised MRF facility is not located on a 'mezzanine floor' as defined in the CoS's LEP, i.e. – 'an intermediate floor within a room'. The MRF layout will allow for movement of forklifts beneath, however it is not an unbroken mezzanine floor area and is better described as a series of elevated platforms for plant with connecting walkways and stairs. This style of MRF design	RTS 2.13

Item	Specific Issue	Response	Reference
		provides for efficiency of material movement through the MRF by making use of gravity to assist in moving material through the process. It is estimated that less than 10% of the MRF area will be walkways and steps, the rest will be machinery including conveyors. Consequently, it could not be described as additional gross floor area in the traditional sense of the LEP definition.	
	Department of Primary Industries		
PA25	No comments.	Noted.	
	Environment Energy and Science Group		
	Landscaping		
PA26	Notes that three existing *Celtis sinensis* onsite will be retained. Identified that this is invasive, exotic tree that has become an environmental weed (DPI NSW Weedwise) and a weed of regional concern (Greater Sydney Regional Strategic Week Management Plan 2017-2022). Spread of seed spread from the site is of concern, particularly due to stormwater culvert along northern end of site in close proximity to these trees. Recommends: ● *Celtis sinensis* be removed and replaced by local native provenance species and any impacted fauna should be relocated. ● Amend landscape plan to show trees removed and planted.	Noted that the three *Celtis* sp trees are an environmental weed and a weed of regional concern. These trees will be removed as part of the revised landscape plan for the proposed facility. A revised landscape plan has been prepared by a professional landscape architectural consultancy (Zenith Landscape Designs) and forms part of this RTS. It meets the requirements of CoS and EES in removing the three *Celtis* sp trees and other requirements as far as reasonably practical	Appendix J RTS 2.12

Item	Specific Issue	Response	Reference
	Provide information on native vegetation community that once occurred in this locality and demonstrate landscaping plant species is from this community.		
	Tree Removal		
PA27	Landscape plan uses a new tree, shrubs and lawn to compensate tree removal. To mitigate urban heat island effect and improve urban tree canopy and local habitat, it is recommend: ● Removed trees replaced at ratio >1:1 with local provenance native plant species ● Use advance and established trees preferably with pot size 75-100 L or greater if commercially available. Provide enough area to allow trees to grow to maturity.	As for item PA26. The landscape plan includes professional advice on the extent to which the proposed facility can mitigate these issues. It is noted that the Arboricultural assessment for the site identified 13 existing trees that will be retained, including 4 *ficus micocarpa* (Curtain fig) of high retention value and canopy spread of 20-25m each tree and 1 *Eucalyptus microcarys* that will now also be retained in response to CoS's submission.	Appendix J RTS 2.12
	Sustainability and Building Design		
PA28	Notes replacement of roof with light coloured metal sheeting and green walls and supports incorporating a cool roof.	The existing roof sheeting will be removed and replaced with light coloured painted metal sheets and translucent panels to facilitate the entry of natural light into the work area. The EIS has not referenced the proposal including 'green walls' or a 'çool roof', in the landscaping sense. The basis for this comment is therefore unclear. To retrofit such features onto what is a basic industrial building not designed to accommodate such features in the first instance is not a realistic option given the major engineering issues involved.	RTS 2.1

Item	Specific Issue	Response	Reference
		It is noted that while the CoS DCP includes provisions which encourage 'green roofs and walls', DCPs are not applicable to State Significant Development applications.	
	Environment Protection Authority		
	Air Quality		
PA29	PM2.5 exceedance - project predicted $PM_{2.5}$ not predicted to cause additional exceedance of 24-hour $PM_{2.5}$ concentrations based on contemporaneous assessment in AQIA. However, it is unclear if worst-case scenario or typical emissions scenario is used in dispersion modelling. Recommend clarifying which emissions scenario is modelled and, if typical scenario, then worst-case scenario should be modelled.	The AQIA has been revised to clarify that modelled emissions scenarios are worst-case. The AQIA remodelled worst-case scenario and estimated lower emissions of $PM_{2.5}$. A revised worst-case scenario was used that is more representative of expected worst-case. The basis is: ● That all mobile plant is operating continuously and that no trucks are idling inside the building. When trucks are operating inside the building, the loader is shut down for safety reasons. ● Pollutant emissions from the loader are higher than the trucks, therefore worst-case hourly emissions will occur when the loader and forklifts are being used exclusively. ● Typical usage of mobile plant is 16 hours/day. ● Loader usage is very light reflecting its use in moving light weight recyclable materials. The previous modelled worst-case scenario was overt in assuming that all mobile plant is operating continuously and that 10 trucks remain idling inside the building and that the loader operates at a high load factor. This is a scenario that will not occur. The AQIA remodelled worst-case scenario demonstrates compliance at all receptors with all impact assessment criteria except $PM_{2.5}$ at the adjacent child care centre. A contemporaneous assessment of 24-hour average $PM_{2.5}$ demonstrates the incremental increase in $PM_{2.5}$ due to the proposal would be largely indistinguishable from the existing background and therefore specific measures to mitigate $PM_{2.5}$ impacts are not warranted.	AQIA 6.2 in Appendix B RTS 2.2
PA30	Modelled meteorological data - AQIA used TAPM generated meteorological data as site-specific data was not available.	The AQIA has been revised to include a comparison of the TAPM wind roses to the wind roses from the Sydney Airport. This indicates that the TAPM model accurately captures the general distribution of wind directions and that wind speeds are lower compared to the Sydney Airport which is to be expected in the developed area of the site.	AQIA 5.1.1 in Appendix B

Item	Specific Issue	Response	Reference
	Recommend applicant demonstrate that model generated meteorological data is acceptable by establishing data adequately describes expected meteorological patterns at the site.		
PA31	Ventilation emissions - AQIA states three ventilation fans will be installed in building roof to avoid fugitive emissions through doors but that design is preliminary. Recommend additional dispersion modelling based on final design and consideration of design to minimise offsite impacts at nearest receptor, the childcare centre.	The AQIA has been revised to present dispersion modelling emissions to air from the proposed facility that reflects the final design of the ventilation system.	AQIA 6.1 in Appendix B
PA32	Except for the roof ventilation and enclosed building, no mitigation measures are proposed in the AQIA. Recommend if project approved, proponent to develop air quality management plan that considers mitigation and control options.	The AQIA identifies that controlled point source emissions at elevated locations results in better dispersion of pollutants and reduced air quality impacts compared to fugitive emission sources. The roof ventilation and enclosed building are key air emission design engineering controls. Engineering controls are a preferred higher hierarchy control over administrative controls such as a management plan. In addition, the proposed facility includes various other design and operational aspects that support air emission control. For example these include: ● One way traffic flow and receival bay design that facilitates efficient truck flow and unloading time ● Rapid doors at entry and exit to minimise fugitive air emissions ● Loader shut down when trucks unloading to receival bay and when not engaged in operation activity. ● Forklifts shut down when not engaged in operation activity. In addition, the AQIA identifies that the incremental increase in $PM_{2.5}$ due to the proposal would be largely indistinguishable from the existing background.	Appendix B RTS Table 4.1

Item	Specific Issue	Response	Reference
		Therefore Visy contend that an air quality management plan is not necessary for the proposed facility. Mitigation measures including signage have been proposed	
	Transport for NSW/Roads and Maritime Services		
	Traffic Management		
PA33	Construction Pedestrian and Traffic Management - several construction projects likely to occur at same time as this development and cumulative increase in construction traffic potential to impact general traffic and bus operation and safety of pedestrians and cyclists, particularly during commuter peak periods. Recommend construction conditions including: ● All demolition and construction vehicles be contained wholly within the site; ● No works zone on Euston Road and Road Occupancy Licence be obtained for any works that may impact traffic flows on Euston Road; and ● Prepare a Construction Pedestrian and Traffic Management Plan and submit copy for endorsement.	Recommended conditions noted. Traffix has been engaged to develop a Construction Pedestrian and Traffic Management Plan.	
PA34	Site Carpark - recommend that layout of proposed car parking areas	The Traffic Impact Assessment identifies the two accessible parking spaces are designed in accordance with AS2890.6-2009.	TIA 5.2 and 7.2.2

Item	Specific Issue	Response	Reference
	(including driveways, grades, turn paths, sight distance requirements, aisle widths and lengths, parking dimensions) be in accordance with AS2890.1-2004 and AS2890.6-2009 and that all vehicles need to enter and exit in forward direction.	It provides an assessment for queuing capacity to determine that truck queues will not extend beyond the boundary of the development in accordance with AS2890.1-2004.	
	Active Transport		
PA35	Active transport - requested that signage/marked walkways to the office from the car parking areas are provided.	Signage/marked walkway will be provided from the staff and visitor car park to the office. This is in line with Visy HSE procedures.	Appendix A
PA36	Consider developing a Green/workplace travel plan to assist with increasing the mode share of walking and cycling for staff and visitors.	Visy has developed a workplace travel plan that supports the use of public or alternative transport to the site. This will be displayed permanently on the site notice board. Visy will provide bicycle parking and shower facilities at the site.	Appendix L
PA37	Request that applicant consult with Sydney Coordination Office within TfNSW in relation to above issues.	Visy has consulted with the Sydney Coordination Office, providing the draft submission responses, including the workplace travel plan, on 24 Jan 2020.	
	City of Waverley		
PA38	Supportive of proposal.	Noted.	

3.3 Organisation Submissions

Three organisation submissions were received in response to the exhibition of the EIS from:

- Printforce Australia
- Only About Children Pty Ltd
- R Cordina & Sons Pty Ltd

Table 3.2 below outlines the issues raised by each organisation and Visy's response.

Table 3.2 - Summary of Organisation Submissions and Response

Item	Specific Issue	Response	Reference
	Printforce Australia		
O1	More dust and trucks. Truck numbers will increase on a current very busy road. Dealing with the current concrete plants and general waste recycling plants regarding trucks and dust is bad enough.	The AQIA provides dispersion modelling for worst-case air pollutant emissions from the proposed facility. The results indicate compliance with the PM_{10} impact assessment criteria.	Appendix B RTS 2.2
		The TIA provides trip generation assessment for worst-case vehicle numbers (trucks plus cars). The proposal will result in a maximum net increase over the current approval use of the site as a warehouse building of 13 vehicles trips per hour during the AM peak period and 16 vehicle trips per hour during the PM peak period.	TIA 6.2.4
		The TIA demonstrates through modelling of the intersection of Huntley and Burrows Roads that the maximum vehicle trips from the proposal will cause insignificant increases in delays with a level of service of B maintained during peak periods. Notwithstanding the intersection will be upgraded to facilitate the WestConnex and Burrows Road will no longer perform a collector road function.	TIA 6.4
		The proposed facility differs significantly from current plants in the local area with regard to dust generating potential and emission control. It is located in an IN1 General Industrial zone and designed to be a modern fully enclosed recycling facility with all vehicles and waste fully contained within the building and a ventilation system to provide point source air emission through roof vents with rapid open/close doors to prevent fugitive emissions.	EIS 2.2.7 and 4.1
		In addition, the proposed facility will only accept kerbside recyclables comprising paper, glass, plastics, steel and aluminium and commercial source separated paper/cardboard. The amount of dust contained within these waste streams is inherently low and compared with materials processed at current nearby plants, the dust generation will be very low.	EIS 2.2.1

Item	Specific Issue	Response	Reference
O2	More vermin. Cardboard food packaging will be recycled and rodent numbers will increase.	The EIS identifies that the proposed facility includes a number of controls to prevent rats and mice in the facility including: ● All waste materials fully contained with the building ● Waste residence time onsite typically less than 24 hours and up to 48 hours ● Daily site inspections including maintaining housekeeping standards ● Use a commercial vermin management provider for rat and mice bait stations throughout the facility. It is acknowledged that kerbside recycling typically includes food and beverage packaging, however it is preferable to use controls to manage the potential impact of vermin and recover recyclable materials rather than the alternative of disposing of the packaging to landfill. Visy has provided recycling services including transfer stations, baling operations and MRFs in eastern Sydney and beyond for 20 years and has demonstrated experience with vermin management for kerbside and paper/cardboard recycling facilities.	EIS 2.2.4 EIS 2.2.1 EIS 1.2
	Only About Children Pty Ltd		
O3	Smell and odours from the site impacting children day to day.	The AQIA provides dispersion modelling for worst-case off-site nuisance odour impacts assuming a 20 tonne load of putrescible waste is unloaded at the proposed facility, noting this is an unlikely event. It also uses a relevant established relationship between odour emission and amount of putrescible waste inside a transfer building. The results indicate compliance with the impact assessment criteria including at the child care centre. Notwithstanding, the AQIA includes information around odour assessment that acknowledges the range of a person's ability to detect odour varies greatly in the population, as does their sensitivity to the type of odour. The proposed facility includes a range of controls to manage and mitigate the potential for odour impact.	AQIA 7.3 in Appendix B AQIA 3.3.3 in Appendix B RTS 4.1
O4	Direct and adverse effects on air quality impacting children day to day.	The AQIA worst-case scenario demonstrates compliance at all receptors with all impact assessment criteria except $PM_{2.5}$ at the adjacent child care centre. A contemporaneous assessment of 24-hour average $PM_{2.5}$ demonstrates the incremental	AQIA 7.1.1 in Appendix B

Item	Specific Issue	Response	Reference
		increase in $PM_{2.5}$ due to the proposal would be largely indistinguishable from the existing background. The proposed facility design has increased the exhaust vent height from 13 metres to 15.9 metres above ground level which is an additional control to mitigate the ground level $PM_{2.5}$.	 RTS 2.2.1
O5	Additional noise and traffic from truck movements in the area.	The Noise and Vibration Impact Assessment determined the additional heavy vehicle movements for the proposed facility is less than 5.5% of the existing heavy vehicle traffic (i.e. 185 additional compared with 3,420 existing on Sydney Road). The predicted noise increase in the day and night-time road traffic noise level is between 0.3dB-0.5dB. Noise increases less than 1dB is barely perceptible and is considered negligible. The NVIA included noise measurements both attended and unattended to determine background noise measurements at receivers including the child care centre in order to derive the Project Noise Trigger Level (PNTL). The PNTL considers both intrusiveness and amenity criteria and incorporates cumulative noise impacts of other industrial sites. It represents the level that, if exceeded, may indicate potential noise impact upon a community. PTNL are derived for 11 separate surrounding receivers across relevant times of the day and night, including for 2 locations at the child care centre (ground floor and first floor). The operational noise from the proposed facility is predicted to comply with the noise criteria at all receivers at all times of the day and night. The TIA demonstrates through modelling of the intersection of Huntley Street and Burrows Road that the maximum vehicle trips from the proposal will cause insignificant increases in delays with a level of service of B maintained during peak periods. Notwithstanding the intersection will be upgraded to facilitate the WestConnex and Burrows Road will no longer perform a collector road function.	NVIA 6 NVIA 3 NVIA 5.6 TIA 6.4
O6	Area is heavily industrialised.	The EIS identified a number of key factors for the site as the preferred location for the proposed facility including being IN1 General Industrial zoning which permits the development of a 'waste or resource management facility' with consent. The Detailed Site Investigation identified that the site use has been industrial since the 1930s. The current warehouse and office building were constructed in 1974 and used for freight and warehousing.	EIS 4.1 DESI 4.8

Item	Specific Issue	Response	Reference
		The Archaeological Report (included in the ACHA) identified that the construction of the Alexandra Canal in 1890 was thought to facilitate the use of waterways for industrial and manufacturing industries.	Appendix D - Archaeological Report 3.1.5
O7	Area being severely impacted by building of West Connex and unacceptable to compound the negative effects of West Connex by building facility.	The EIS identified a number of key factors for the site as the preferred location for the proposed facility including strategic access to WestConnex and Sydney Gateway infrastructure and local road and intersection upgrades in support of WestConnex to support travel safety and efficiency for recyclable collection trucks. The TIA identifies the future road network following WestConnex. This includes extensive upgrades of local roads and intersections, in order to allow for direct connections to the St Peters Interchange and to cater for additional traffic demands. This will result in a number of key improvements to the road network in the vicinity of the site. The TIA provides a summary of the future intersection performance of key intersections following WestConnex in 2023 and 2033 and an assessment of these intersections in the context of the proposed development. Most intersections relied on by the proposal are determined to continue to perform within capacity in 2023. Visy acknowledges that construction activities related to the WestConnex include road and intersection closures and construction truck traffic and appear to also include rerouted heavy and light vehicular traffic to Burrows Road. It is understood that a traffic detour through Burrows Road has been in place for the past two years apparently associated with Euston Road widening, intersection upgrades at Burrows Road/Huntley Street and Burrows Road/Campbell Road. It is hoped that with the new M5 currently nearly complete and associated local road upgrades expected to be completed this year, that the current traffic diversions and WestConnex construction trucks using Burrows Road will cease and vehicle through traffic will return to the upgraded Euston Road.	EIS 4.1 TIA 3.2 TIA 6.5 Table 6
O8	Facility within short distance of childcare centre will adversely affect the health and wellbeing of our children, team and families.	The EIS describes that the site selection process included consideration of the neighbouring child care centre as a sensitive receiver. It also identifies the key factors below in support of the site as the preferred location. Visy noted the scarcity of suitable sites to meet the needs of the proposed facility and that the child care centre is occupied during weekday daytime hours only. On balance, Visy determined to proceed with the development of a modern recycling facility using design engineering	EIS 4.1

Item	Specific Issue	Response	Reference
		controls for air, noise, traffic, and fire to mitigate potential impacts to the neighbouring sensitive receiver. As a result, the proposed facility includes a wide range of mitigation and measures to ensure all relevant environmental impacts likely to be generated by the facility are addressed. The AQIA, which addresses the SEARs and is in accordance with the approved methods, demonstrates worst-case scenario dispersion modelling for the facility (see row 4). Site selection key factors: ● INI General Industrial zoning which permits the development of a 'waste or resource management facility' with consent; ● Strategic access to WestConnex and Sydney Gateway infrastructure; ● Local road and intersection upgrades to support travel safety and efficiency for recyclable collection trucks; ● Existing large building to allow development of modern fully enclosed dry recycling facility.	RTS 4.1 EIS 4.1
	R Cordina & Sons Pty Ltd		
O9	Primary producer being put under pressure in cost of feed and other inputs to poultry business due to drought conditions. Example given is of available bedding materials to grow birds. Alternative materials identified but notes current supplier numbers unable to meet demand for these products. Has suggested that shredded recycled cardboard may be option for bedding material and hopes to discuss this with Visy to find viable solution for business supply issues.	Comments are noted. The producer may choose to approach Visy to discuss these ideas.	

3.4 Public Submissions

Three public submissions were received in response to the exhibition of the EIS, including:

- Boris Pavic
- John Mitchell
- Name withheld

Table 3.3 below outlines the issues raised by each individual and Visy's response.

Table 3.3 – Summary of Public Submissions and Response

Item	Specific Issue	Response	Reference
	Boris Pavic		
	Air Quality		
P1	Facility will produce incremental increase in some already high levels of pollutants in the area. AQIA predicts: ● Total annual average $PM_{2.5}$ concentration at or exceeding impact assessment criteria (Table 7-1) Ground-level concentration of Formaldehyde (VOC) are significantly exceeding the impact assessment criterion (Table 7-3).	The AQIA remodelled worst-case scenario demonstrates compliance at all receptors with all impact assessment criteria except $PM_{2.5}$ at the adjacent child care centre. A contemporaneous assessment of 24-hour average PM2.5 demonstrates the incremental increase in $PM_{2.5}$ due to the proposal would be largely indistinguishable from the existing background and therefore specific measures to mitigate $PM_{2.5}$ impacts are not warranted. Table 7-3 is corrected as some VOC criteria were incorrectly transcribed from Table 3-2 in the previous AQIA provided as part of the EIS. The VOC impact assessment criteria are not changed and are as per Table 3-2. Formaldehyde ground level concentration is below the goal criteria at all receptors as presented in Table 7.3 of the revised AQIA.	AQIA 7.1 in Appendix B RTS 2.2.1 AQIA 3.3.2 in Appendix B AQIA 7.2 in Appendix B
	Traffic		
P2	Future traffic levels on Euston Road/Sydney Park Road intersection in conjunction with the New M5 predicted levels (Table 6, TIA), indicating operation of LoS category F or at best D level in 2023/2033. These correspond to "unsatisfactory and require additional capacity" and "operating near capacity" respectively.	TIA Table 6 shows future intersection performance for Euston Road/Sydney Park Road in 2033 AM peak as LoS category F with NO WestConnex and improving to LoS category D WITH WestConnex. In 2023 there is no change in the LoS for this intersection with or without WestConnex. The TIA noted that most intersections will perform with the same or better Level of Service with the introduction of the WestConnex for both 2023 and 2033 scenarios. It also noted that the WestConnex projects and associated improvements in local roads will result in significant changes to traffic conditions in the local and regional road network. These major upgrades are designed to facilitate future growth in traffic predicted in the year 2023 and 2033. The TIA determined that the net traffic generation (trucks and cars) for the proposed facility compared with the existing approved use as a warehouse is ● 13 vehicle trips per hour during the AM peak and	TIA 6.5 TIA 6.4 and 6.5 TIA 6.2.4

Item	Specific Issue	Response	Reference
		• 16 vehicle trips per hour during the PM peak. which equates to no more than an additional vehicle trip every four minutes during peak periods.	
P3	Question accuracy of predicted road traffic noise generation for the facility (page 24, NVIA), as they show similar noise increase values for two vastly different source sizes, in particular: • Additional 37 heavy vehicle movements on 105-155 Euston Road contribute 0.3dB increase in road traffic noise during the day and 0.4dB at night Additional 185 heavy vehicle movements on Sydney Park Road contribute 0.3dB increase in road traffic noise during the day and 0.5dB at night.	The NVIA was conducted in accordance with the approved method (NSW Road Noise Policy) which requires the average road traffic noise be assessed for the daytime period (7.00am to 10.00pm) and the night period (10.00pm to 7.00am). The predicted noise increase for the worst affected receivers is for the average road traffic noise throughout the day and night period. Section 6.2 presents existing road traffic data. The daily heavy vehicle traffic for the roads near the proposed facility are over 3,000 on Sydney Park Road, over 5,000 on Campbell Road and over 2,000 heavy vehicles on Euston Road north of Sydney Park Road. The additional heavy vehicle movements for the proposed facility for each of these roads is less than 5.5% (i.e. Sydney Park Road 185/3420=5.4% and 37/2240=1.6% Euston Road). Therefore, the contribution in the day and night-time road traffic noise level is predicted to be minor and similar.	NVIA 6.2 and 6.3
P4	Noise of 220 heavy vehicles during the day decelerating to stop and accelerating from stationary on traffic lights at Sydney Park Road/Euston Road intersection, in the perception of a reasonable person, must be significantly larger than predicted increases.	The NVIA determined whether increased traffic associated with the proposed facility will impact residential receivers along Sydney Park Road, Campbell Road and Euston Road north of Sydney Road in accordance with the approved method (NSW Road Noise Policy). As described at row P3, the contribution in the day and night-time road traffic noise level is predicted to be between 0.3dB-0.5dB. Noise increase less than 1dB is barely perceptible and is considered negligible.	NVIA 6.2 and 6.3
P5	Suggests concerns can be effectively addressed by relocating access to/from facility from Burrows Road to Euston Road with traffic light control to facilitate entry/exit from the facility. This	The EIS identifies that during design scoping for the proposed facility, Visy discussed with RMS the option of a layout where trucks could enter the site from Euston Road and exit to Burrows Road (or Euston Road). However, RMS advised that Euston Road will be a classified road following its upgrade and that they did not support trucks accessing the site from Euston Road.	EIS 4.2

Item	Specific Issue	Response	Reference
	would enable routing of heavy traffic from/towards Princes Hwy through non-residential areas of Euston Road (south) and Campbell Street, avoiding overbearing traffic in residential areas in Euston Road (north) and creating traffic gridlock at the Burrows Road and Huntley Street intersections.	The TIA demonstrates through modelling of the intersection of Huntley Street and Burrows Road that the maximum vehicle trips from the proposal will cause insignificant increases in delays with a level of service of B maintained during peak periods. Notwithstanding the intersection will be upgraded to facilitate the WestConnex and Burrows Road will no longer perform a collector road function.	TIA 6.4
	John Mitchell		
P6	Comments identical to rows 1-5 above.	As per items P1-P5 above.	
P7	Plans show outdated version of new West Connex intersection at 5 Sydney Park Road and Euston Road, they have removed the southbound right turn bus lane.	Noted. This does not affect the TIA.	TIA Figure 6
P8	Pollution levels have not been adjusted to take into account the forecasted extra traffic from the soon to open West Connex link.	The AQIA and Greenhouse Gas assessments were prepared in accordance with the SEARs and approved methods. The AQIA worst-case scenario dispersion modelling basis is that all mobile plant is operating continuously and that no trucks are idling inside the building. When trucks are operating inside the building, the loader is shut down due to safety reasons. This is because pollutant emissions from the loader are higher than the trucks, therefore worst-case hourly emissions will occur when the loader and forklifts are being used exclusively. The Greenhouse Gas Assessment included Scope 1 direct emissions from all facility owned plant and equipment along with outgoing trucks (i.e. bulk haul trucks and semi-trailers) and Scope 3 various emissions from all incoming trucks (i.e. kerbside and commercial recycling collection trucks) and employee car travel to and from work. Assessment of emissions resulting from WestConnex is not in the SEARs for the proposed	AQIA 3 in Appendix B and GGA 3 AQIA 6.2 and 6.2.1 in Appendix B GGA 3

Item	Specific Issue	Response	Reference
		facility.	
	Name Withheld		
	Air Quality		
P9	Health concerns regarding existing toxic air quality from existing surrounding operations, including building material waste dust. Toxic dust found inside our premises, on walkways and roads and is corroding our building - what is it doing to our health.	The AQIA is prepared in accordance with the SEARs and approved methods and provides dispersion modelling for worst-case air pollutant emissions from the proposed facility. Concern about air emissions from existing operations is noted, however assessment of these existing operation emissions is beyond the scope of the SEARs. The proposed facility differs significantly from current plants in the local area with regard to waste material received and emission control. It is located in an IN1 General Industrial zone and designed to be a modern fully enclosed recycling facility with all vehicles and waste fully contained within the building and a ventilation system to provide point source air emission through roof vents with rapid open/close doors to prevent fugitive emissions. In addition, the proposed facility will only accept kerbside recyclables comprising paper, glass, plastics, steel and aluminium and commercial source separated paper/cardboard. The amount of dust contained within these waste streams is inherently low and compared with materials processed at current nearby plants, the dust generation will be very low.	AQIA 3 and 6.2 in Appendix B EIS 2.2.7 and 4.1 EIS 2.2.1
P10	Air quality air monitoring in Earlwood used - why don't they take samples outside facility to give us true reading.	The AQIA used the nearest OEH air quality monitoring station at Earlwood which is approximately 5 kilometers west of the proposed site. Air sampling at the site is not is not in the SEARs for the proposed facility.	AQIA 4.2 in Appendix B EIS 9.1
P11	What is toxic dust doing to the child-care centre next door?	See response at items P1, P3 and P4.	
P12	Facility proposes ventilation system on roof, which is in line with top floor of neighbouring premises with high wind corridor from south directly into our factory complex. Odours and toxic	See response at items P1, P3 and P4. The AQIA identifies that controlled point source emissions at elevated locations results in better dispersion of pollutants and reduced air quality impacts compared to fugitive emission sources.	AQIA 6.1 in Appendix B and RTS 2.2

Item	Specific Issue	Response	Reference
	particles are of concern to our health and wellbeing from this ventilation exposure.	The proposed facility design has increased the exhaust vent height from 13 metres to 15.9 metres above ground level which is an additional control to mitigate air quality impacts. The roof ventilation and enclosed building are key air emission design engineering controls. Engineering controls are a preferred higher hierarchy control over administrative controls such as a management plan. In addition, the proposed facility includes various other design and operational aspects that support air emission control. For example these include: ● One way traffic flow and receival bay design that facilitates efficient truck flow and unloading time; ● Rapid doors at entry and exit to minimise fugitive air emissions; ● Loader shut down when trucks unloading to receival bay and when not engaged in operation activity; and ● Forklifts shut down when not engaged in operation activity.	RTS 2.2.1 RTS 4.1
	Traffic		
P13	Traffic congestion for a number of years caused issues with entry and exit into Burrows Road from many premises and for surrounding streets and Alexandria in general.	The TIA provides trip generation assessment for worst-case vehicle numbers (trucks plus cars). The proposal will result in a maximum net increase over the current approval use of the site as a warehouse building of 13 vehicles trips per hour during the AM peak period and 16 vehicle trips per hour during the PM peak period. The TIA demonstrates through modelling of the intersection of Huntley Street and Burrows Road that the maximum vehicle trips from the proposal will cause insignificant increases in delays with a level of service of B maintained during peak periods. Notwithstanding the intersection will be upgraded to facilitate the WestConnex and Burrows Road will no longer perform a collector road function.	TIA 6.2.4 TIA 6.4
P14	Already too many trucks near facility with nearly daily illegal parking in no stopping area or even footpath facing the wrong way - obstructing traffic and visibility. How can even more trucks be sustained? Access for emergency	See item P13. The EIS describes the proposed facility will have one-way internal traffic flow with entry and exit doors fitted with a rapid door, which will remain closed and open only to permit passage of a truck and then immediately close. The TIA demonstrates the development has sufficient capacity that trucks will not be delayed entering the facility and will not queue on Burrows Road.	EIS 2.2.5 TIA 7.2

Item	Specific Issue	Response	Reference
	service will become even more difficult.	The fire system design process includes ongoing consultation with FRNSW to ensure all relevant emergency management measures are addressed including access for emergency services.	EIS 13 RTS 2.5
	Noise and Vibration		
P15	Noise and vibration from machinery, trucks & large forklifts is already high. Noise measurements from another part of the suburb are not realistic for the area around facility. Our factory complex shakes when large trucks and machinery being used and not a comfortable workplace which will get worse with increased activity, especially with 24/7 operation and more trucks and processing.	The NVIA identified that heavy vehicle movements for the proposed facility is less than 5.5% of the existing heavy vehicle traffic (i.e. 185 additional compared with 3,420 existing on Sydney Road). The predicted noise increase in the day and night-time road traffic noise level is between 0.3dB-0.5dB. Noise increase less than 1dB is barely perceptible and is considered negligible. The NVIA included noise measurements both attended and unattended to determine background noise measurements at receivers including the neighbouring 95 Burrows Road multi tenant development in order to derive the Project Noise Trigger Level (PNTL). The PNTL considers both intrusiveness and amenity criteria and incorporates cumulative noise impacts of other industrial sites. It represents the level that, if exceeded, may indicate potential noise impact upon a community. PTNL are derived for 11 separate surrounding receivers across relevant times of the day and night, including for 3 locations at 95 Burrows Road. The NVIA also include attended noise measurements of Visy's existing St Peters operation to collect Sound Power Level of the noise sources on site, in particular the baling plant and mobile plant (i.e. loader and forklifts) which will be relocated to the proposed facility. The operational noise from the proposed facility is predicted to comply with the noise criteria at all receivers at all times of the day and night. The NVIA identifies that during construction the use of a hydraulic hammer for short periods may produce vibration impact on the nearest receive that could cause minor annoyance. A The recommended noise management and mitigation measures will be implemented.	NVIA 6 NVIA 3 and 4 NVIA 5.2 NVIA 5.6 NVIA 8.2
	Use		
P16	What will be the effect of another recycling facility?	The EIS identifies the project need is fundamentally to replace Visy's existing recyclable materials operation at St Peters, in particular, to ensure continuity of recycling services	EIS 1.4

Item	Specific Issue	Response	Reference
		for eastern Sydney. Beyond this, the proposed facility will allow for future growth in Visy's capacity to receive and process kerbside recyclables and commercial source-separated paper/cardboard which is in line with anticipated future growth in population volumes for recycling.	
P17	Alexandria has changed and Burrows Road too. There are new buildings built and being built both residential and commercial. We have a child-care centre, brewery/restaurant, fitness studio, high tech businesses. Does a recycling plan of building waste plant fit into the current changing demographics?	The EIS identified key factors in selecting including that it is zoned IN1 General Industrial zoning which permits the development of a 'waste or resource management facility' with consent and the existing large building allows development of modern fully enclosed dry recycling facility. It is noted that child care centres are no longer permissible in the IN1 General Industrial zone in the Sydney LGA.	EIS 4.1
		The external facade of the existing building on Burrows Road will not change significantly and the landscape plan is intended to fit in and enhance the visual appeal of the street frontage. All operations, including trucks, waste and processing will be fully contained within the building.	EIS 17
		The EIS also identifies the need for the proposed facility (see item P16) and details the statutory and strategic context for both the planning process and recycling drivers. The proposed facility will only accept kerbside recyclables comprising paper, glass, plastics, steel and aluminium and commercial source separated paper/cardboard.	EIS 4.3 and 5
		The AQIA and NVIA identified the surrounding land uses and sensitive receptors, including the future residential development at 205-225 Euston Road and the neighbouring child care centre.	AQIA 2.2 in Appendix B and NVIA 2
	Hazard		
P18	Facility will be a major fire hazard.	The EIS identifies the proposed facility is subject to the new FRNSW *Fire Safety in Waste Facilities Guideline* issued in August 2019. As such, extensive consultation with FRNSW and consideration of an effective fire system for the site has driven the design of the facility. An FEBQ has been lodged and there has been continuous consultation with FRNSW. This process includes various fire modelling scenarios to refine the fire system design.	EIS 5.4.7 and 13
		The PHA for the proposed facility includes identification and risk assessment of various hazardous events including fire in accordance with approved method (HIPAP 6) and fire modelling for a warehouse building. A key determination is that the risk criteria for	PHA 5 in Appendix F

Item	Specific Issue	Response	Reference
		fatality and injury in residential and other sensitive areas are satisfied for radiant heat from fires.	

4 Revised Mitigation Measures

4.1 Mitigation Measures

The mitigation and management measures are summarised in **Table 4.1**.

Table 4.1 – Mitigation and management measures for key environmental issues

Mitigation and management measures
Suitability of the site
The site selection process which identified the site as the preferred option and suitable for the intended use, acknowledged that it would be necessary to include mitigation measures in the proposal to ensure all relevant environmental impacts likely to be generated by the facility were addressed. This EIS has identified the potential environmental impacts in relation to air quality and odour, soil and water, noise and vibration, traffic and transport, flooding, soils, fire and incident management, hazards, biodiversity, waste management, heritage and Aboriginal cultural heritage, and visual amenity. Appropriate mitigation and management measures for each of the potential impacts described in the EIS sections 8-19 and additional measures described in the RTS are summarised below.
Noise and vibration
Construction Management and mitigation measures to control against potential noise and vibration impacts during construction include: • Limit construction hours to 7am to 6pm Monday to Friday and 8am to 5pm Saturday and Sunday and no work on public holidays; • Ensure roller doors remain closed as much as practicable; • Consult with neighbours to inform them of construction activities and timeframes and scheduling to minimise impact as practicable; and • Display site contact details and establish complaints register and protocol. **Operation** Management and mitigation measures to control against potential noise and vibration impacts during operation include: • Contain all operation activities within fully enclosed building; • Install rapid doors with acoustic shielding as required to open only to permit vehicle passage; • Install weatherproof acoustic louvres on 3 unused doorways to permit required ventilation air intake while minimising noise emissions; • Install acoustic shielding for ventilation fan ductwork; • Install acoustic shielding on unused roller door on the north side of the building as required for stage 2; • Review location of glass silo to ensure facility noise emissions satisfy noise standards; • Implement operation procedures to minimise noise from mobile plant as far as practicable, i.e. turn off mobile plant when not in use; • Investigate use of non-audible mobile plant warning system, i.e. visual blue light identifying 3m zone rather than audible reversing beeper; • Display site contact details and establish complaints register and protocol; and • Undertake noise compliance monitoring to verify noise performance against impact assessment.

Mitigation and management measures

Air Quality and Odour

Construction
Management and mitigation measures to control against potential air quality impacts during construction, in addition to those identified for noise and vibration impacts, include:

- Where practicable, restrict dust-generating outdoor construction activities during hot, dry and windy weather conditions;
- Cover the loads of trucks removing earth or other dust-generating material from the site.

Operation
Management and mitigation measures to control against potential air quality impacts during construction include:

- Contain all operations activities and waste material within the fully enclosed building;
- Install vehicle exhaust system for the facility that provides point source air emissions via three roof vents with exhaust stacks at approximately roof ridge height and no fugitive emissions from the facility;
- Refuse putrescible waste onto the site and if any such contamination is found, promptly remove the putrescible in accordance with Visy's materials handling processes set out in section 2 of this EIS;
- Accept only dry recyclable waste material onto the site with no onsite stockpiling other than in accordance with Visy's materials handling processes set out in section 2 of this EIS;
- Signage directing to turn off engines for stationary bulk haul trucks during loading and mobile plant when not in use;
- Signage directing to turn off engines for recyclable collection trucks if expecting to be stationary longer than 1 minute;
- Signage directing trucks directed to the staging area inside the building to turn off their engines;
- Minimise the time recyclable collection trucks take to unload and exit the facility;
- Provide facilities that encourage employees to use alternative to and from work options including bicycles;
- Maintain the throughput of the product and ensure the product is removed from site as soon as possible to minimise potential odours; and
- Install rapid doors to help any odour from escaping outside the building.

Stormwater, Water Quality and Flooding

Construction
Management and mitigation measures to control against potential stormwater and water quality impacts during construction include:

Erosion and sediment control

- Prepare an erosion and sediment control plan for the external works as part of the Construction Environmental Management Plan incorporating:
    - An upslope catchment length of below 80 metres unless a berm is installed;
    - Disturbed lands to be rapidly rehabilitated; and
    - Diversion berms to divert clean water away from construction areas with discharges either to a stabilised well vegetated area of the existing stormwater system.
- Ensure construction waste is contained onsite and removed for appropriate disposal; and
- Undertake contractor induction and provide amenity facilities to ensure all waste is appropriately disposed of and work site housekeeping is ongoing.

Operation
Management and mitigation measures to control against potential stormwater, water quality and flooding impacts during operation include:

- Contain all waste material within fully enclosed operations building in designated material type areas only;
- Seal drainage pits within the operations building to eliminate connection with stormwater drainage system;
- Install impermeable bunding of operations building to contain any fire water;

Mitigation and management measures

- Test fire water to determine any contamination levels prior to appropriate disposal to sewer or licensed facility;
- Install weighbridge sump pumps to enable contained fire water to be removed;
- Store any hazardous waste brought into the facility as unacceptable waste in a designated area appropriately raised above the 1% AEP level plus 0.5m freeboard and with additional containment suitable to the type of waste;
- Raise all electrical equipment/machinery which cannot withstand water inundation within the warehouse above the 1% AEP flood level;
- Implement regular site housekeeping and inspections including operations area floor sweeping to ensure loose litter items are collected and any sediment in operations area is removed;
- Locate spill kits strategically throughout the building for use in the event of any minor spills; and
- Use self bunded diesel storage tank with integrated dispenser for refuelling mobile plant;
- Store hydraulic oil for stationary and mobile plant on bunded pallet and use in accordance with site procedure;
- Store cleaning fluids and flammable liquid in appropriate cabinets; and
- Implement the Flood Evacuation and Emergency Plan for the site (EIS Appendix K).

Waste Management

Construction

Management and mitigation measures for waste management during construction include:

- Implement waste management to ensure construction waste is contained onsite and removed for appropriate disposal;
- Undertake contractor induction and amenity facilities to ensure all waste is appropriately disposed and work site housekeeping is ongoing;
- Separate storage receptacles for general waste, the main streams of recyclables and vegetation;
- Implement stop work procedures if asbestos is found during the demolition phase and remove the asbestos in accordance with Australian Standards and the NSW Code of Practice - How to Manage and Control Asbestos in the Workplace, the Code of Practice - How to Safely Remove Asbestos and WorkCover NSW Guide - Working with Asbestos;
- Test, classify and dispose of spoil in accordance with *EPA's Waste Classification Guidelines 2014* and the requirements of the *Protection of the Environment Operations Act* 1997; and
- If spoil contains Potential Acid Sulfate Soils treat the spoil in accordance with the Acid Sulfate Soil Management Plan.

Operation

Management and mitigation measures for waste management during operation include:

- Contain all waste material within fully enclosed operations building in designated material type areas only;
- Provide information on acceptable and unacceptable wastes for recyclable material collections to Councils and businesses;
- Prepare a Contingency Waste Management Plan (CWMP) as part of the OEMP to include procedures in the event of processing down-time;
- Provide rat and mouse bait stations for vermin control;
- Store any hazardous waste brought into the facility as unacceptable waste in a designated area appropriately raised above the 1% AEP level plus 0.5m freeboard and with additional containment suitable to the type of waste;
- Keep the quantity of recyclable materials to a minimum by maintaining the throughput of the product and ensuring the product is removed from site as soon as possible; and
- Undertake regular site housekeeping and inspection including operations area floor sweeping to ensure loose litter items are collected and any sediment in operations area is removed.

Mitigation and management measures

Hazards and Risks

The PHA recommendations for hazard management and mitigation will be followed including to include in the emergency response plan contact numbers for potentially impacted neighbouring businesses in the adjacent developments to the north and south and the child care centre to provide warning if a fire occurs.

Other management techniques designed to mitigate hazard risks include:

- Install fire management system which is discussed in Section 13;
- Implement waste management measures identified previously, in particular for hazardous waste such as gas cylinders and flares;
- Locate spill kits strategically throughout the building for use in the event of any minor spills;
- Install Self bunded diesel storage tank with integrated dispenser for refuelling mobile plant;
- Store hydraulic oil for stationary and mobile plant on bunded pallet and used in accordance with site procedure;
- Store cleaning fluids and flammable liquid stored in appropriate cabinets;
- Implement regular site housekeeping and inspections;
- Implement emergency response training for site employees as part of the site's emergency response plan;
- Prohibit smoking in operations building and smoking only permitted on the site is designated areas; and
- Secure site with access by authorised persons only.

Fire and incident management

Visy will undertake the management and mitigation measures determined through the Fire Engineering Brief Questionnaire (FEBQ) consultation process with FRNSW, which will be incorporated into the final design. These may be the various matters set out in the FEBQ as fire safety measures and alternative solutions to address fire and incident management impacts.

Traffic and transport

Construction

Management and mitigation measures for traffic and transport impacts during construction include:

- Prepare a Construction Traffic Management Plan (CTMP) as part of the CEMP to include:
  - Signage to identify the Visy site and direct traffic as required;
  - A 13 km/h speed limit for construction traffic within the site;
  - Use of temporary fencing and signage as required to define work areas, traffic flow and parking; and
  - Pedestrian routes to minimise interactions between pedestrians, plant and vehicles; and
  - Any temporary road impacts outside the site as applicable, i.e. partial lane closure for driveway works if required.

Operation

Management and mitigation measures for traffic and transport impacts during operation include:

- Prepare an Operational Traffic Management Plan (OTMP) as part of the OEMP to include:
  - Signage to identify the Visy site and direct traffic as required;
  - A 13 km/h speed limit for construction traffic within the site;
  - Designated pedestrian walkway within the operation building with physical barriers providing separation to the AAA (authorised access only) operation area;
  - Site induction for all workers and contractors including Visy's strict HSE controls for pedestrian and powered mobile plant interactions; and
- Provide bicycle parking and end of trip facilities and develop a Workplace Travel Plan to encourage employees to utilise more sustainable forms of commuting to and from the facility;
- Site design, traffic flow and management are aimed at minimising time onsite for recyclable collection trucks to unload and exit the facility;
- Bulk haul truck movements will be concentrated at efficient travel times, within Council constraints for kerbside recycling collection times;
- Provide internal staging area for use in extreme cases with signage directing engines be turned off in the staging area; and

Mitigation and management measures

- As a last resort, divert trucks to Visy's other waste processing sites such as those at Taren Point or Smithfield if there is insufficient capacity onsite and as part of the CWMP.

Biodiversity

Management and mitigation measures for potential biodiversity impacts:

- Retain all substantial existing plantings along Euston Road and ensure not greater than 'low impact' on the TPZs;
- Retain two substantial trees and other existing landscaping within the Burrows Road car park area;
- Introduce new landscaping along the Burrows Road building setback area, including lawn, shrubs and new trees to compensate for the removal of four Casuarina trees to facilitate vehicular access;
- Introduce new landscaping trees in the north-western corner of the site to replace three *Celtis sp* trees to be removed;
- Tree protection zones be included for relevant trees during construction as set out in the Arboricultural report; and
- Maintain all existing and new landscaping to a high standard.

Visual amenity

Construction

Management and mitigation measures for potential visual impacts during construction include:

- Contain all works equipment and materials within designated boundaries of the site;
- Minimise vehicle parking for workers through the use of existing site car parking areas;
- Leave external works areas left tidy at the end of each day;
- Orientate external lighting so that it minimises glare and light spill impact on adjacent receivers; and
- Install tree protection around the trees to be retained on Euston Road in accordance with AS 4970-2009.

Operation

Management and mitigation measures for potential visual impacts during operation include:

- Maintain new and existing landscaping along Euston Road and Burrows Road in good condition;
- Construct the new roof of a material to complement the existing building and have a light colour with low reflectivity;
- Construct new roof exhaust vents to not exceed ridge line height to provide air pollution control while minimising visual impacts;
- Use recessive colour and materials to minimise visual impacts of new rapid roller doors and acoustic louvres; and
- Install new external light fittings in such a way that directs light downwards to minimise impacts on adjacent uses and in accordance with AS/NZS 4282:2019.

Socio-economic Impact

Construction

Management and mitigation measures for potential socio-economic impacts during construction include:

- Implement the consultation strategy described in Section 6 of the EIS throughout the construction period for both stages of construction; and
- Include community information and awareness strategy in the CEMP and outline measures to maintain communication with the community and all relevant stakeholders throughout the construction process.

Operation

Management and mitigation measures for potential socio-economic impacts during operation include:

- Display site contact details and establish complaints register and protocol.

Mitigation and management measures

Contaminated soils and asbestos

Construction

Management and mitigation measures for potential contaminated soils and asbestos during construction include:

- Prepare an erosion and sediment control plan as part of the CEMP as described in Section 10 of the EIS;
- Prepare a Construction Acid Sulphate Soil Management Plan (ASSMP) to include detail on how ASS is to be managed, treated and disposed of or re-used on-site;
- If demolition involves suspected asbestos containing material, engage a licensed asbestos assessor to test for asbestos in the materials that will be removed and/or modified, establish the level of risk, and develop an appropriate response and management plan;
- Retain in-situ any asbestos material not proposed to be disturbed and record the location on the site's asbestos register for future reference; and
- Engage a licensed removal contractor to remove and dispose of any asbestos that requires removal in accordance with appropriate standards, codes and guidelines.

Operation

Management and mitigation measures for potential contaminated soils and asbestos during operation include:

- Prepare a site hazard and environmental risk register in line with Visy HSE requirements that includes the management of unacceptable waste, as presented in Section 2 and Section 12.
- Develop procedures for any onsite activity involving risk of contaminant spill, i.e. mobile plant refuelling; and
- Implement Visy HSE procedure for minor spills, including location spill kits strategically throughout the facility and providing staff training on their use, disposal of used materials, and replenishment of the kit;
- Prepare a Pollution Incident Response Management Plan (PIRMP) for the operation of the facility.

Aboriginal Heritage

The following measures will be undertaken prior to any potential impacts occurring on the site:

- Prepare an Aboriginal objects and suspected human remains unexpected finds procedure as part of the CEMP as described in section 2.3 of the RTS.

5 Conclusion

5.1 Final remarks

This RTS identifies a number of amendments to the proposed facility design as a result of ongoing design engineering in Section 2.1 and set out in the amended plans in **Appendix A** and in **Sections 2.5, 2.9 and 2.10**.

Additional information for the proposed facility as required from mitigation and management measures in the EIS is presented in **Appendix B**, **Appendix D** and **Appendix E** and **Sections 2.2, 2.3 and 2.4**.

A response to all matters raised in submissions to the EIS from the public authorities, organisations and local public is presented in **Section 3**. References are given with each response to additional information within this RTS and its Appendices as well as the EIS and its appended assessment reports.

An updated mitigation and management measures summary for the proposed facility that reflects the additional information set out in this RTS is provided in **Section 4.1**. This supersedes measures presented in the EIS.