Waste Management Facility, Botany

SUBMISSIONS REPORT

Prepared for Coombes Property Group | 23 April 2025

element.

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SSD 62855708 | SUBMISSIONS REPORT

Prepared for Coombes Property Group
23 April 2025

PR397

	Prepared by	Reviewed by
Name	Victoria Hale	Luke Farrell
Company	Element Environment	Element Environment
Position	Senior Environmental Consultant	Principal Environmental Consultant
Project Role	Project Manager	Project Director
Signature		
Date	23 April 2025	23 April 2025

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0	15 January 2025	For review	Element Environment	Coombes Property Group
1	21 January 2025	For review	Element Environment	DPHI
2	23 April 2025	For submission	Element Environment	Coombes Property Group

Executive summary

Background

Coombes Property Group (CPG) and KLF Group (KLF) are proposing to develop a construction and demolition (C&D) waste management facility (the 'project') at 2-4 Hale Street, Botany in the Bayside local government area (LGA).

The facility will accept up to 300,000 tonnes per annum (tpa) of C&D waste and will operate as a waste transfer station receiving, sorting and storing C&D wasteprior to bulk transportation to resource recovery facilities within the KLF group, where more advanced sorting and recycling will be undertaken.

The project is considered State significant development (SSD) under clause 23(2) of Schedule 1 of State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP).

An environmental impact statement (EIS) was prepared to provide an assessment of the economic, environmental and social impacts of the project and identify measures to mitigate impacts where required. It intended to assist the community, Councils, State government agencies and the consent authority to gain a clear understanding of the project and its impacts so they could make an informed submission or decisions on the merits of the project.

This report provides a response to submissions (RTS) received on the EIS.

The NSW Department of Planning, Housing and Infrastructure (DPHI) subsequently published the EIS on the Major Projects portal between 7 August – 3 September 2024 and notified relevant government agencies with an invitation to review.

Submissions were received from the following government agencies:

- Air Services Australia.
- Ausgrid.
- Bayside Council (Council).
- Civil Aviation Safety Authority (CASA).
- NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW).
- DCCEEW – Biodiversity, Conservation and Science Division (BCS).
- NSW Environment Protection Authority (EPA).
- Fire and Rescue NSW (FRNSW).
- Heritage NSW.
- Jemena.
- NSW Ports.
- NSW State Emergency Service (SES).
- Sydney Airport.
- Sydney Water.
- Transport for NSW (TfNSW).
- Water NSW.

A total of 29 community submissions were also received which include 28 objections and one comment. 26 submissions were individuals and three were special interest groups.

DPHI requested a submissions report be prepared in accordance with DPIE's (2022) State Significant Development Guidelines: Preparing a Submissions Report.

This submissions report has been prepared to consider and respond to government agency and community submissions and provide clarification on components of the proposed development where relevant.

Analysis of submissions

A total of 29 community submissions and 16 government agency submissions were received.

The key themes of the submissions include the economic, environmental and social impacts of the project, particularly traffic, air quality, biodiversity, waste, surface water, hazard and risk. Submissions also requested clarification on the assessment of surface water, traffic and noise in accordance with relevant guidelines and policies.

Actions since receipt of submissions

In the time since the receipt of submissions on the EIS, the scope of the project has been refined.

Submissions were received from Council regarding potential concerns around inadequate parking spaces, suggesting one car parking space should be provided for each staff member in addition to four visitor spaces. As there are 11 proposed full-time employed (FTE) staff this would be a total of 15 car parking spaces. CPG has amended the design of the site to push the cantilevered office back into the warehouse building's footprint on the second floor to allow for the two additional car parking spaces outside. In doing so, there are now three car parking spaces perpendicular to the car entry/exit on the eastern side.

The aforementioned refinement to the concept design will result in environmental and social benefits, including:

- More parking spaces to accommodate all employees being on-site at any one time.
- Additional space for soft landscaping and increased tree canopy in the car parking area.
- No requirement to utilise street carparking.

Response to submissions

Since the receipt of submissions of the EIS, technical investigations have been updated, including:

- Traffic impact assessment (TIA).
- Flood impact assessment.
- Infrastructure assessment.
- Integrated water management strategy (including MUSIC modelling).
- Noise and vibration impact assessment (NVIA).
- Social impact assessment (SIA).
- Air quality impact assessment (AQIA).
- Detailed site investigation (DSI).
- Remedial action plan (RAP).
- Architectural plans.
- Test excavation methodology.

The revised assessments consider the refinements to the project and are included as appendices to this report.

Project justification

The EIS, this submissions report and technical investigations have concluded that with the implementation of proposed design, environmental management and mitigation measures, the project will not significantly impact the local biophysical and social environments.

Based upon the predicted environmental impacts of the project and the ability to manage these impacts to minimise harm to the environment, the project is unlikely to create any significant adverse environmental impacts on adjoining properties or prejudice the future use of land in the locality.

Given the need for the project, suitability of the site, consistency with plans and policies and minor environmental impacts, the proposed development is in the public interest and is recommended for approval.

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CHAPTER 1

INTRODUCTION

1 INTRODUCTION

1.1 Overview

Coombes Property Group (CPG) and KLF Group (KLF) are proposing to develop a construction and demolition (C&D) waste management facility (the 'project') at 2-4 Hale Street, Botany in the Bayside local government area (LGA).

The facility will accept up to 300,000 tonnes per annum (tpa) of C&D waste and will operate as a waste transfer station receiving, sorting and storing C&D waste prior to bulk transportation to resource recovery facilities within the KLF group, where more advanced sorting and recycling will be undertaken.

The project is considered State Significant Development (SSD) under clause 23(2) of Schedule 1 of State Environmental Planning Policy (Planning Systems) 2021 (Planning Systems SEPP).

An environmental impact statement (EIS) was prepared to:

- Provide an assessment of the economic, environmental and social impacts of the project.
- Identify measures to mitigate impacts where required.
- Assist the community, State and local government agencies and the consent authority to gain a clear understanding of the project and its impacts so they could make an informed submission or decisions on the merits of the project.

This report provides a response to submissions (RTS) received on the EIS.

1.2 Assessment and review of the proposed development

An EIS was prepared for the proposed development by EME Advisory Pty Ltd (EME) on behalf of CPG and KLF (EME, 2024). The EIS addressed the requirements of:

- Section 4.12 of the NSW Environmental Planning and Assessment Act 1979 (EP&A Act).
- Schedule 2 of the NSW Environmental Planning and Assessment Regulation 2021 (EP&A Regulation).
- The Secretary's environmental assessment requirements (SEARs) issued for the project on 25 October 2023 (being SSD-62855708).
- The State Significant Development Guidelines – Preparing an Environmental Impact Statement (DPE, 2021).

The EIS was submitted to the NSW Department of Planning, Housing and Infrastructure (DPHI), who subsequently published the EIS on the Major Projects portal between 7 August – 3 September 2024 and notified relevant government agencies with an invitation to review.

Submissions were received from the following government agencies:

- Air Services Australia.
- Ausgrid.
- Bayside Council (Council).
- Civil Aviation Safety Authority (CASA).
- NSW Department of Climate Change, Energy, the Environment and Water - Water (DCCEEW).
- DCCEEW – Biodiversity, Conservation and Science Division (BCS).
- NSW Environment Protection Authority (EPA).
- Fire and Rescue NSW (FRNSW).
- Heritage NSW.
- Jemena.

- NSW Ports.
- NSW State Emergency Service (SES).
- Sydney Airport.
- Sydney Water.
- Transport for NSW (TfNSW).
- Water NSW.

A total of 29 community submissions were also received.

DPHI requested a submissions report be prepared in accordance with DPIE's (2022) State Significant Development Guidelines: Preparing a Submissions Report in a letter dated 4 September 2024 and requested information to be included in the submissions report in a letter dated 13 September 2024.

1.3 Purpose of the report

This submissions report has been prepared in accordance with the DPIE's (2022) State Significant Development Guidelines: Preparing a Submissions Report. The purpose of the document is to consider and respond to government agency and public submissions and provide clarification on components of the project where relevant.

1.4 The proposed development

The project is described in Chapter 3 of EME (2024) and will involve the demolition of the existing buildings on site and hardstand to make way for the proposed waste transfer station.

Site infrastructure for the waste management facility has been designed to allow for trucks to drive into the purpose-built warehouse where the waste can be tipped, spread, turned and inspected. Accepted waste will be sorted into indoor stockpiles for dispatch to other KLF advanced resource recovery facilities.

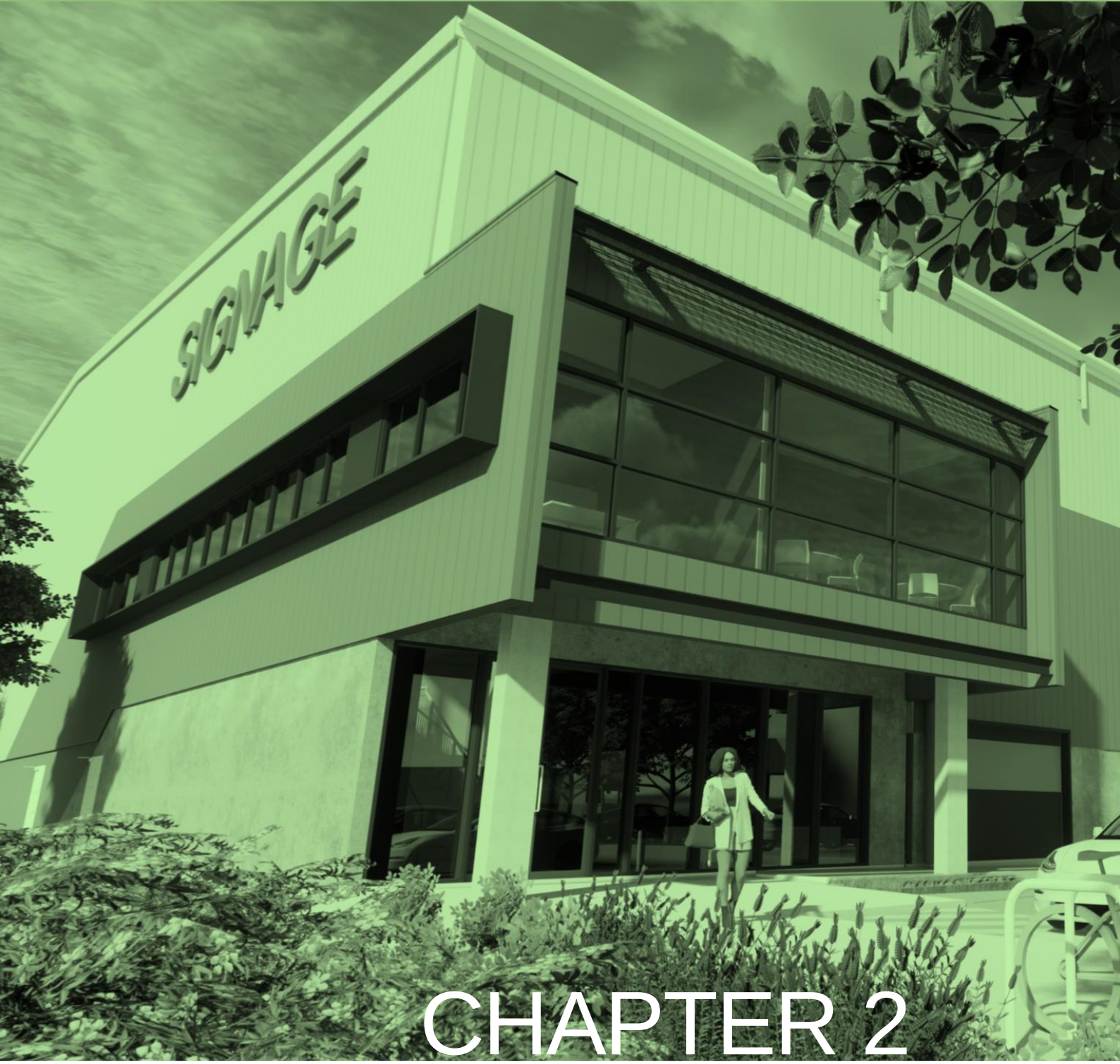
The key environmental assessments from the environmental impact assessment, EME (2024) is summarised in Table 1.1.

Table 1.1 Summary of key environmental assessments from the EIS

Environmental issue	Comments
Aviation	The height of the western side of the waste transfer building has been restricted to avoid intrusion into aviation protection surfaces above Sydney Airport. Site lighting has also been designed to minimise distraction to pilots during take-off and landing. Further work will be undertaken during detailed design to investigate how the design of the western façade can be treated to minimise potential interference with airport navigation and communications systems.
Waste strategy	The waste strategy assesses how waste generated by the facility during its construction and operation will be managed to promote recycling and resource recovery and to reduce the amount of waste disposed to landfill. It also provides an assessment of the proposed development against the NSW EPA *Standards for managing construction waste in NSW* (2018) showing compliance with each of the five standards. Information on the types and quantities of off-site waste that will be received during operation of the facility, and management procedures in relation to this waste, is provided in Chapter 3 of the EIS. Waste types, quantity and management associated with the construction and demolition process will be detailed as part of a construction environmental management plan (CEMP). The CEMP will be supported by a waste management plan (WMP) that will outline procedures for sorting, transporting and disposing of all waste. All waste for disposal will be classified in accordance with the Waste Classification Guidelines (EPA, 2014) before being transported off site for further processing or disposal at a suitable licenced facility. Mitigation for operational waste will be identified in an operational environmental management plan (OEMP) and include measures such as providing designated waste and recycling storage areas for the site office.
Air quality and odour	The air quality impact assessment considers the potential impact of the project on particulate matter concentrations, including total suspended particulates (TSP), PM_{10} and $PM_{2.5}$ (particulate matter less than 10 micrometres and 2.5 micrometres in diameter respectively). The assessment of operational air quality impacts concludes the project will achieve compliance with the relevant air quality criteria, with minor incremental impacts at all surrounding receptor locations. A risk assessment was undertaken for construction related dust impacts which concluded that impacts at receptor locations will be negligible.
Traffic and access	The traffic impact assessment considers the impact of the project on the performance of the surrounding road network. The assessment concludes that the intersection of Hale Street and Foreshore Road is expected to operate at Level of Service A (or 'good operation') under the base case and development scenario for both the morning and afternoon peak period. No external infrastructure improvements (intersection upgrades) are required to accommodate the project. The project provides sufficient parking to cater for staff and visitor numbers and has demonstrated that vehicles can access the site and manoeuvre through the site safely.
Noise and vibration	The operational noise impact assessment considered the potential impact of plant and equipment operating on site on nearby receptors such as residences and schools. The assessment results indicate that noise levels comply with the project trigger noise level for each receiver catchment for each time of the day.
Flood risk	The flood impact assessment identified that in the 1% annual exceedance probability (AEP) flood event, the entire site becomes surrounded by floodwaters and Hale Street become untrafficable in parts.

Environmental issue	Comments
	The main recommendation of the flood risk assessment is raising of the finished floor levels of buildings to 0.5 m above the 1% AEP flood level to reduce the risk of flood water ingress to buildings. This has been incorporated into the site and building design. In addition, the building will be designed to withstand inundation to the probable maximum flood (PMF) flood level and be constructed from flood compatible materials. This will support the use of the building for a shelter in place strategy as part of the emergency response.
Surface water	A new stormwater discharge point will be installed at the front of the site on Hale Street, with a proposed extension to Council's stormwater drainage system on Hale Street. The stormwater drainage and treatment system for the developed site will comprise roof drainage to a 60 cubic metre rainwater tank, a pit and pipe drainage system for stormwater, treatment of stormwater through a rain garden at the Hale Street frontage, and flood storage. Surface water quality assessment demonstrates compliance with Council requirements for all criteria including gross pollutants, suspended solids, total phosphorous and total nitrogen.
Soils and contamination	The soils and contamination assessment involved a detailed site investigation, remediation action plan and acid sulfate soils management plan. While no significant or gross contamination impacts associated with the site have been identified during the assessment, there are contamination issues to be addressed such that the site can be considered suitable for the proposed land use. Requirements to make the site suitable for the proposed use from a contamination perspective include: ▪ Decommissioning of two disused underground service tanks (USTs). ▪ Further assessment and/or remediation of elevated Trichloroethene (TCE) in soil vapour, binded asbestos and heavy metals in soils. The objective of the remediation is to remove/manage potential risks posed by the identified contamination issues, such that the site is made suitable for the proposed development.
Hazard and risks	The screening test of quantities of the hazardous materials and chemicals to be stored onsite do not exceed the screening thresholds of Applying SEPP 33 (DoP, 2011a) and therefore does not fit the definition of 'potentially hazardous industry' or 'hazardous storage establishment'. Therefore, a preliminary hazard analysis (PHA) is not required. In addition, the weekly and annual delivery quantities, as well as the approximate quantity per load to the site will be well below the transport screening thresholds specified in Table 2 of Applying SEPP 33 (DoP, 2011a). There are no additional hazards/risk factors associated with the proposed development outside the scope of Applying SEPP 33 (DoP 2011a) risk screening method. The project is not expected to generate pollution at levels deemed unacceptable, thereby avoiding impact on the amenity of the area. Consequently, it is determined that the project is not a potentially offensive industry.
Fire and incident management	The findings from the assessment indicate that the proposed development will be capable of satisfying the requirements identified under the FRNSW Guidelines with respect to the majority of requirements with the incorporation of mitigation measures identified in Section 6.10.4 of the EIS. Deviations from the FRNSW guidelines have been identified for three areas, namely: ▪ Requirement for an automated smoke hazard management system. ▪ Requirement for stockpiles to not exceed 4 m in height. ▪ Requirement that the fire sprinkler system delivers not less than the total hydraulic demand for a minimum of two hours duration.

Environmental issue	Comments
	Based on the assessment and the rationale for deviations from the FRNSW Guidelines, it is demonstrated that the overall design supports adequate provision for fire safety and facilitates safe fire brigade intervention to protect life, property and the environment with the incorporation of the measures identified in Section 6.10.4 of the EIS.
Aboriginal heritage	An Aboriginal cultural heritage assessment report (ACHAR) has been prepared which considers the impacts the construction of the proposed development might have on Aboriginal cultural heritage and the potential archaeological resources within the study area. The depth of the modern fill on site varies substantially across the site ranging from 0.2 – 3 m, as established by preliminary investigations. Based on preliminary designs, impacts will not exceed the depth of the modern fill identified during preliminary investigations. The '2-4 Hale Street Potential Aboriginal Deposit (PAD) 01' covers the entirety of the site and comprises buried natural sands within an estuarine environment subject to extensive sea level variation during the Holocene. In the case of 2-4 Hale Street PAD 01 the deposits are covered by a layer of modern fill that acts to provide a protective layer above the sensitive deposit. Impacts to the PAD will only take place where this protective modern fill layer is removed. Works that do not exceed the depth of modern fill are unlikely to result in harm to 2-4 Hale Street PAD 01. Remediation of the USTs may result in disturbance to the surrounding deposits and therefore may result in direct partial impacts to 2-4 Hale Street PAD 01. The ACHAR recommends that should the need for further archaeological investigation be triggered, an assessment should be undertaken to confirm the presence of Aboriginal objects and update the significance assessment and potential for harm from the proposed development. Based on the findings of the ACHAR, an Aboriginal cultural heritage management plan (ACHMP) has been recommended.
Other issues	Other issues that were assessed include: ▪ Non-aboriginal heritage ▪ Social. ▪ Visual. ▪ Ecologically sustainable development. ▪ Utilities. ▪ Biodiversity. For each of these issues, the potential for impact is considered to be low or has been addressed through the site layout, design or construction and operational strategies.



CHAPTER 2

ANALYSIS OF SUBMISSIONS

2 ANALYSIS OF ADVICE

Advice was received from the following 17 government agencies:

- Air Services Australia.
- Ausgrid.
- Council.
- BCS.
- CASA.
- DCCEEW – Water.
- EPA.
- FRNSW.
- Heritage NSW (cultural and aboriginal heritage).
- Jemena.
- NSW Ports.
- SES.
- Sydney Airport.
- Sydney Water.
- TfNSW.
- Water NSW.

DPHI concerns were listed in a request for information in submissions report letter dated 13 September 2024 and have also been addressed.

It is noted that the following agencies did not raise any specific issues or objections relating to the EIS that required addressing:

- Air Services Australia.
- Ausgrid.
- CASA.
- FRNSW.
- Jemena.
- Sydney Airport.
- Sydney Water.
- TfNSW.
- Water NSW.

2.1 Summary of submissions

A summary of the number of comments, objections and support are in Table 2.1.

Table 2.1 Overview of submissions

Position	Community	Government agency	Public organisation
Comment	1	17	0
Recommendation	0	0	0
Objection	28	0	3

2.2 Submission categories

The key themes of the matters raised in the submissions are summarised in Table 2.2. Many submissions commented on multiple themes. The themes are grouped into categories as shown in Table 2.2.

Each individual government agency submission is addressed in Chapter 4, while public submissions are addressed in Chapter 5.

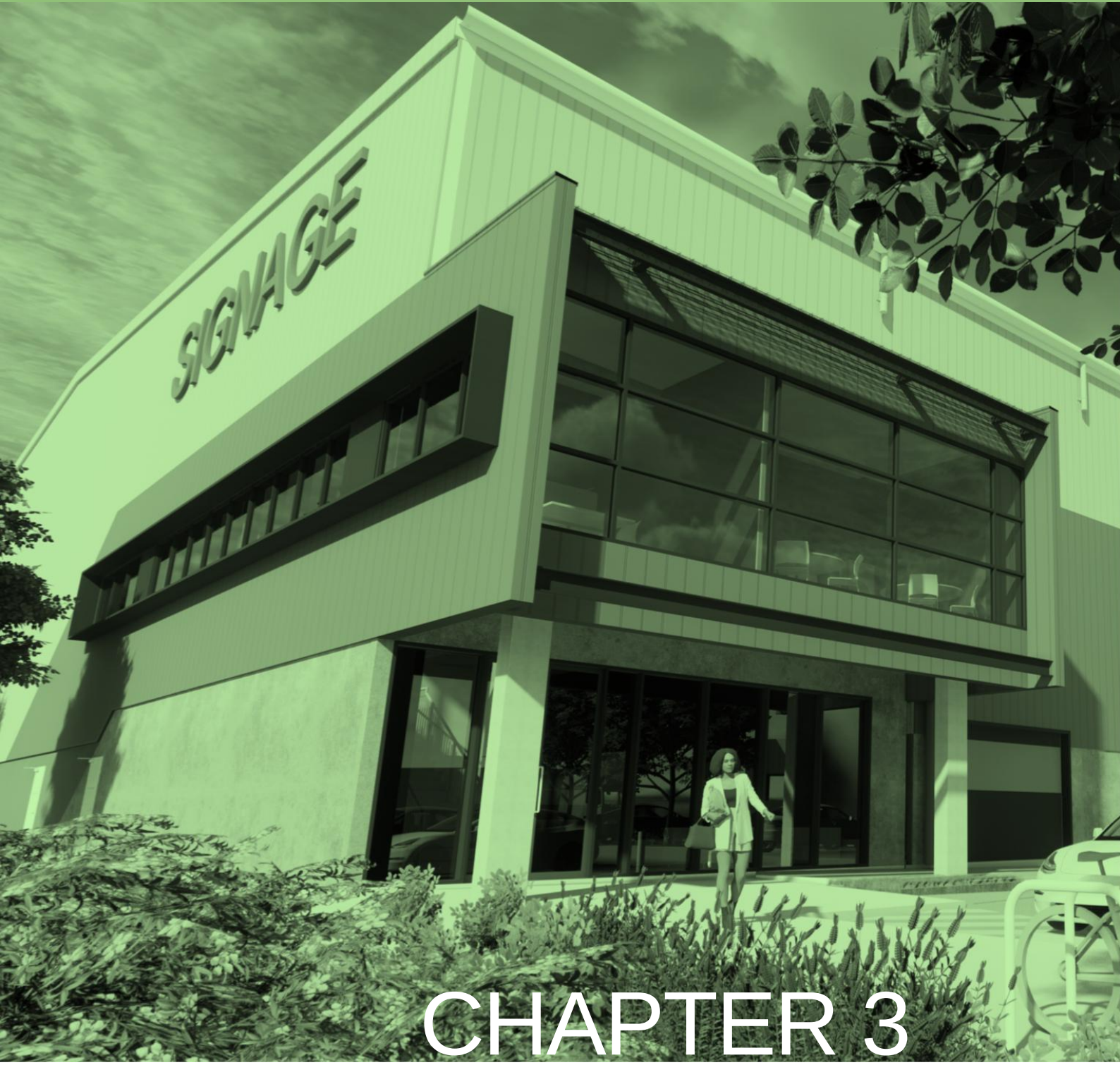
Submissions often included multiple comments with issues in different categories which have been captured in Table 2.2.

Table 2.2 Key submission categories

Submission					
Category	**Sub-category**	**Aspect**	**Total agency comments or recommendations**	**Total public comments or recommendations**	**Total comments or recommendations**
The project	Construction	Dial before you dig	2	0	2
	Fire Safety	Operations	1	0	1
	Project location	Nearby residential area	0	6	6
	Project area	Limited space	0	2	2
	Airport safety	Construction	2		2
Procedural matters	Stakeholder engagement	Community consultation	1	6	7
	Airport	Federal airport regulations	1	0	1
The economic, environmental and social impacts of the project	Groundwater	Policy and framework	3	0	3
	Heritage	Aboriginal cultural heritage management	2	0	2
		Cultural heritage significance	0	3	3
	Water management	Water and wastewater services	3	0	3
		Water access licence (WAL)	4	0	4
		Site water demand construction phase	2	0	2
	Stormwater	Critical asset stormwater	1	0	1
		Stormwater management	18	0	15
	Traffic	Traffic generation	4	21	23
		Parking	4	3	6
		Local	1	14	14
		Queuing	6	9	15
		Traffic management	1	3	3
		Road safety	1	0	0
		Site movements	3	0	2
		Swept paths	4	0	4
		Access	1	6	6
	Waste	Waste types	0	8	8
	Hazards and risks	Health and safety concerns	0	18	18
	Flooding	Floodplain management	28	3	31
	Contamination	Land contamination	2	0	2

Submission					
		Safety and hazard	0	11	11
	Landscape	Landscape	8	0	8
	Biodiversity	Biodiversity development assessment report (BDAR)	0	2	2
		Flora and fauna	0	7	7
		Joseph Banks Park	0	4	4
		Mill Pond	0	5	5
	Air quality and odour	Sensitive receptors	0	3	3
		Air quality assessment	2	0	0
		Air quality	0	11	11
	Noise and vibration	Noise and vibration impact assessment (NVIA)	14	0	13
		Noise pollution	0	10	10
The justification and evaluation of the project	Data	NSW EPA waste management facilities	0	2	2
	Land use	Alternative option	0	1	1
Issues beyond the scope	Waste management facilities	Contamination	0	1	1
		Existing waste facility	0	4	4
	Botany area	Development	0	2	2

Table 2.2 indicates that the key themes of the submissions include the economic, environmental and social impacts of the project particularly traffic, air quality, biodiversity, waste, surface water, hazard and risk. Submissions also requested clarification on the assessment of surface water, traffic and noise in accordance with relevant guidelines and policies.



CHAPTER 3

ACTIONS TAKEN SINCE RECIEPT OF SUBMISSIONS

3 ACTIONS TAKEN SINCE RECEIPT OF SUBMISSIONS

In the time since submissions were received on the EIS, the scope of the project has been refined in consultation with key stakeholders and revised environmental impact assessment carried out in response to received submissions, which are further described in the following section.

3.1 Refinements

3.1.1 Engineering design

Concept design

As described in Chapter 3 of the EIS, CPG initially sought to:

- Construct a warehouse on the western side of the site with an office and amenities.
- Construct a car park with a total of 13 car parking spaces comprising of 9 staff car park parking spaces and 4 visitor spaces.

As further detailed in Chapter 4, submissions were received from Council regarding potential concerns around inadequate parking spaces. Council suggested one car parking space should be provided for each staff member in addition to the four visitor spaces. As there are 11 proposed full-time employees (FTE) this would be a total of 15 car parking spaces.

As outlined in Appendix B, CPG has amended the design of the site to push the cantilevered office back into the warehouse building's footprint on the second floor to allow for the two additional car parking spaces outside. In doing so, there are now three car parking spaces perpendicular to the car entry/exit on the eastern side.

The proposed concept design refinement is anticipated to result in several environmental and social benefits, including:

- More onsite parking in the event that all FTE will be onsite at any one time.
- Additional space for soft landscaping and increased tree canopy in the car parking area.
- No requirement to utilise on street car parking.

The DPIE (2022) State Significant Development Guidelines: Preparing a Submissions Report require a proponent to:

Summarise the actions the applicant has taken since the public exhibition to address the issues raised in submissions, including:

- *refining or amending the project*
- *undertaking further engagement with the community*
- *undertaking further assessment of the impacts of the project.*

A refinement is defined as 'a change that fits within the limits set by the project description and does not change what the applicant is seeking consent for or require an amendment to the DA for the project'.

With the above considered, the proposed refinement to design will not alter the core function and objective of the proposed development as previously described in the EIS and exhibited.

The refinement to design will be confined to the same site footprint that was initially assessed in the EIS and has come about in direct response to submissions raised on potential concerns around inadequate parking spaces.

Given the anticipated benefits of the change and no risk of compounded environmental or social impact, the change in design qualifies as a project refinement and is subsequently described in and further assessed in this submissions report.

3.2 Additional environmental impact assessment

Since the receipt of submissions on the EIS, additional clarification has been provided in relation to submissions received on traffic and access, flood risk, surface water, landscaping, noise and vibration, social impact, air quality, and soils and contamination.

Where required, additional environmental impact assessment was carried out in response to received submissions, as further detailed below.

The revised assessments considered the refinements to the project outlined above, where relevant, and are included as appendices to this report.

3.2.1 Traffic impact assessment

Traffix Group Pty Ltd (Traffix) prepared the traffic impact assessment (TIA) submitted with the EIS.

TfNSW raised no objections or concerns in relation to the EIS. However, in response to issues/concerns raised by DPHI and Council, Traffix was engaged to provide additional specialist input and assessment in relation to potential impacts on traffic and the surrounding road network.

Traffix's updated report is attached as Appendix C and Traffix's responses to the specific traffic and parking issues/concerns are summarised in Sections 4.2.1 and 4.5.1.

The revised TIA has reaffirmed that the project will contribute to a net reduction in on-street parking demand, the site can accommodate 26 m B-doubles and that all key intersections will operate satisfactorily and there will be a net reduction in vehicle generation in comparison to the existing development. The TIA provides updates to onsite parking, traffic modelling, swept path analysis and a crash data analysis in line with comments from Council and DPHI.

3.2.2 Flood impact assessment

CJ Arms Pty Ltd (CJA) prepared the flood impact assessment submitted with the EIS.

The EPA and DPHI raised no objections or concerns in relation to the EIS. However, in response to issues/concerns raised by Council, the SES and BCS, CJA provided additional specialist input and assessment in relation to flooding and flood emergency planning.

CJA's supplementary information on flooding and flood emergency planning is attached as Appendix D and responses to specific concerns are summarised in Section 4.2.3, 4.3 and 4.8.

CJA have updated the flood impact assessment and associated appendices to address government agency comments and reaffirm the proposed design planning levels show the site is free of flooding up to the 1% AEP without any undue impact of afflux on downstream properties.

3.2.3 Surface water

CJA prepared an infrastructure assessment and integrated water management strategy submitted with the EIS.

Water NSW raised no objections or concerns in relation to the EIS. However, in response to issues/concerns raised by Council, Sydney Water and DCCEEW – Water, CJA provided additional specialist input and assessment in relation to surface water.

CJA's supplementary information on infrastructure and integrated water management strategy is attached as Appendix E and F and responses to specific concerns are summarised in Section 4.2.2, 4.4 and 4.5.3. Appendix G provides the MUSIC modelling file.

3.2.4 Landscaping

CJA prepared a landscape concept report submitted with the EIS.

DPHI raised no objections or concerns in relation to the EIS. However, in response to issues/concerns raised by Council, CJA provided additional specialist input and assessment in relation to landscaping.

CJA's updated landscape concept report is attached as Appendix H and responses to specific concerns are summarised in Section 4.2.5 and 4.5.5.

3.2.5 Aboriginal heritage

Artefact Consulting Services Pty Ltd (Artefact) prepared an aboriginal cultural heritage assessment report (ACHAR) submitted with the EIS.

In response to issues/ concerns raised by Heritage NSW, Artefact were engaged to produce a test excavation methodology and register the PAD on the Aboriginal heritage information management system (AHIMS).

Artefact's test excavation methodology is attached as Appendix I and a summary of Artefact's responses to specific concerns are summarised in Section 4.7.1.

3.2.6 Noise and vibration

E-LAB Consulting Pty Ltd (E-LAB) prepared a noise and vibration impact assessment (NVIA) submitted with the EIS.

In response to issues/ concerns raised by EPA and DPHI, E-LAB provided additional specialist input and assessment in relation to noise impacts.

E-LAB's updated NVIA is attached as Appendix J and responses to specific concerns are summarised in Section 4.5.2and 4.6.1.

The revised NVIA has reaffirmed that the project is compliant with the relevant noise and vibration criteria and the waste management facility is expected to comply with the applicable regulations subject to mitigation measures outlined in the report.

3.2.7 Social impact

Astrolabe Group Pty Ltd (Astrolabe) prepared a social impact assessment (SIA) submitted with the EIS.

In response to comments raised by DPHI, Astrolabe provided an updated SIA.

Astrolabe's updated SIA is attached as Appendix K and responses to specific concerns are summarised in Section 4.5.6.

3.2.8 Air quality

Northstar prepared an air quality impact assessment (AQIA) submitted with the EIS.

NSW EPA raised no objections or concerns in relation to the EIS. However, in response to an incorrect reference raised by DPHI, Northstar updated their report.

The AQIA is attached as Appendix L and Northstar's responses to specific concerns are summarised in section 4.5.4.

3.2.9 Soil and contamination

JBS&G prepared a detailed site investigation (DSI) and remedial action plan (RAP) submitted with the EIS.

NSW EPA and DPHI raised no objections or concerns in relation to the EIS. However, in response to issues/ concerns raised by Council, JBS&G were engaged to provide additional specialist input and update their reports.

JBS&G's updated DSI and RAP are attached as Appendix M and Appendix N. JBS&G's responses to specific concerns are summarised in Section 4.2.4.

3.3 Additional stakeholder engagement

3.3.1 Bayside Council

Traffic

Representatives from Traffix, CPG, KLF and Element attended a meeting with Council on 7 November 2024 to clarify and discuss the response to Council's comments. Council's comments, concerns and the in-meeting response is detailed in Table 3.1. A detailed response to Council's comments is provided in Section 474.2.1.

Table 3.1 Council traffic meeting comments and response

Concern	Council comment	Response
Truck queuing	Will inbound and outbound waste occur at the same time?	KLF clarified that there are far less outgoing truck movements than incoming movements.
Truck queuing	Trucks come and go as they please, there could be any one number of trucks at one time.	KLF noted this is inherent with this type of facility. The assessment has also been undertaken in accordance with the RTA Guide to Traffic Generating Developments (2002).
Intersection performance	The intersection of Hale Street and Foreshore Road (East Hale Street Right turn) operates at intersection Level of Service F in the post development scenario which is not supported.	Traffix noted a previous error, and the intersection actually operates at Los A.
Internal maneuverability	Swept path analysis shows unrealistic turn	Traffix advised that the swept path analysis has been updated with recent near map aerial and has been undertaken with industry leading software AutoTURN Pro. Traffix can

Concern	Council comment	Response
		provide animated swept paths or perform a live demonstration to validate the integrity of the analysis if required.
	The swept paths indicate all turning movements (to allow trucks to enter and exit the site in a forward direction) will occur within the warehouse where waste is being sorted. More details need to be provided demonstrating why this is acceptable and, as to how a dedicated area will be kept clear for vehicle manoeuvring particularly when unloading/sorting is occurring. There is a conflict with storage and swept path in relation to overtake.	Traffix confirmed that the site will operate sequentially and that the need to overtake is statistically improbable.
Street parking	The loss of public parking needs to be supplemented by the development.	Clarification was provided that all employees can park on site, with no impact to street parking
Road upgrades	A slip lane needs to be investigated along the frontage of the site to allow room for truck queuing whilst allowing for other vehicles to pass and continue driving eastbound.	A slip lane will have conflicts with street parking and based on their assessment, Traffix have concluded it is not required. Slip lanes are only usually required from an arterial road, part of the classified road network. Hale Street is a local road servicing an industrial area.

Following the meeting, CPG had a phone conversation with Council and agreed to send Council an updated draft TIA for review and either convene another call or have Council provide written comments.

On 3 December 2024, Council provided the following comments:

The responses to the Bayside Council RFI are acceptable except for the issue raised regarding the LOS and queuing experienced at the intersection of Hale Street and Foreshore Road. Council disagrees with the applicant's argument that the average delay of all movements means the intersection is operating satisfactorily. The Hale Street approach experiences excessive queueing in peak hours which is reflected in the poor LOS experienced on the Hale Street approach. This issue is evidenced in aerial data and site observations where westbound queuing often extends well beyond the bridge.

The applicant needs to implement measures as part of this development to improve the LOS, queue length, degree of saturation etc. experienced on the Hale Street approach.

Additionally, the applicant should investigate having the car entry/exit driveway revised to be in a location that reduces the loss of on-street parking.

Traffix and CPG responded to Council with the following email on 4 December 2024:

Thank you for passing on the comments from your engineers in relation to our updated TIA. We are pleased to hear that the engineers have accepted the majority of our proposed responses.

In relation to their ongoing comments on the LOS at the intersection of Hale Street and Foreshore Road, we would like to reiterate:

- *Traffic modelling has been undertaken and interpreted in accordance with TfNSW Guide to Traffic Impact Assessment (TS 00085, Ver 1.1) and TfNSW Traffic Modelling Guidelines (Ver 1.0).*
- *Our proposed development results in a net reduction in the vehicle generation potential of the site compared to the existing site conditions which aligns with Council's objective of alleviating road network capacity and street parking concerns.*
- *Moving the truck entry / exit point East is beneficial from a road safety perspective (as supported by the aerial photograph provided by the engineers).*

Thank you again for following up with the engineers and the additional feedback will be addressed in our final TIA.

Flooding

Representatives from CJ Arms, CPG, KLF and Element attended a meeting with Council on 7 November 2024 to clarify and discuss the response to Council's comments on flooding matters. Council's comments, concerns and the meeting notes are detailed in Table 3.2. A detailed response to Council's comments is provided in Section 4.2.3.

Table 3.2 Council flooding meeting comments and response

Council comment	Response	Meeting notes
The flood impact assessment does not address the requirements of section 9.5.4 of the Bayside DCP and the NSW Flood Risk Management Manual which is not supported. Therefore, a full assessment of the developments flood impacts cannot be undertaken given the information submitted. The following issues are identified in the flood impact assessment:	Refer to Appendix D for updated FIA.	
The presentation of the flood data is not to industry standard and excessively lengthens and confuses the flood report. All storm durations, temporal patterns and blockage scenarios for each AEP storm event and development scenario need to be combined into maximum results grids. All flood modelling outputs need to be re-done. Currently Council cannot make an informed assessment due to how the flood mapping has been presented.	Due to the excessive model run time (>30 hours each), modelling all storm durations, temporal patterns and blockage scenarios for each AEP storm event and development scenario is not practical. We believe the data and mapping we have provided to date is appropriate for this stage of development. The NSW Flood Risk Management Manual (FRMM) notes that full ensemble modelling (as required to prepared composite maps of median storm events) is generally only done for models that run in relatively short time frame, which this model does not. The FRMM also notes that, most commonly, ensemble modelling is done for hydrology to identify critical storm (duration and temporal pattern) and then the pattern closest to the mean (the Critical Storm pattern) is used in hydraulic studies (refer NSW FRM manual section 3.6.4) and this has been our approach. The flood data was presented this way in the pre-application meeting with Council (21 February2024) with no feedback received from Council that this was not appropriate or acceptable at that time. We also note we have done a number of studies for other Councils (including City of Sydney and Penrith City Council) where this has been acceptable and in one case requested by Council. If additional clarification is required, we can remove data not relevant for each critical storm or provide composite maps using the two critical storms (TP08 and TP10) that cover Hale Street and the rear stormwater drain.	Council noted presentation of the data was confusing and hard to interpret. It was agreed that CJA would produce a composite map of the critical storms patterns (TPs) to have one map for each event.

Council comment	Response	Meeting notes
It's unclear how the site has been modelled outside of the building footprint. The architectural plans do not provide sufficient information of design levels outside of the building footprint. There are no civil engineering (stormwater) plans accompanying the development. Given there is a lack of details with the SSD supporting documentation, the flood modelling results cannot be confirmed to be accurate. For example, it's clear that the internal driveway will start at approx. RL 1.3m AHD at the Hale Street entry and will need to ramp up to RL 2.50m AHD at compliant gradients with AS2890.2. This inevitably means the site will be filled to different extents across the entire driveway. This fill needs to be modelled in the flood model as it will impact and displace floodwaters. A civil grading plan needs to be prepared for the site and the cut/fill across the site needs to be reflected in the flood modelling.	Surfaces in the model for the design scenario were updated with civil design surfaces (as noted in Section 9.12 of the report) as reflected in the design flood results. Civil engineering plans can be provided as an appendix. Flood storage volumes will be calculated using the flood model results.	Council requested to review plans (architectural and civil) with site levels, survey, cut/fill and grading plans. It was agreed that this will be provided.
The flood modelling is not undertaken to the requirements of section 9.5.4 of the Bayside DCP.	Council did not identify any specific sections of DCP that were not complied with. Items identified by CJA as not compliant with DCP section 9.5.4 include: ▪ Engineering qualifications – to be provided. ▪ Survey plan – to be provided. ▪ PMF afflux – to be provided. ▪ Blockage conditions – blockage scenarios a per council model provided and advice from Aaron Biffin (via Robert McKinlay) email 22 February2024. ▪ Climate change – modelling has now been done and maps will be included in updated report.	It was agreed that missing information will be provided. It was also agreed that modelling scenario ARRBLK scenario (departure from DCP) was acceptable and Council requested a section in the revised report to explain and justify this choice of blockage scenario.
The assessment in section 5.4 and the flood hazard shown in figure 7 is incorrect. This figure is inconsistent with Council's flood advice letter issued for the site. This assessment does not present a true description of the existing flood hazard which is H3 high hazard.	H3 and H4 hazard zones are not showing on Councils online interactive map (https://maps.bayside.nsw.gov.au/Intramaps98/?module=Flood) which is where the image in the initial report came from. Report will be updated with the hazard map provided in Council's flood advice letter and noting small area of H3 hazard located in the existing driveway (area circled in image below).	Hazard map will be updated with Council advice map as provided.

Council comment	Response	Meeting notes
The third paragraph in section 7.1.1 and section of 7.4.3 is incorrect. Council has provided the applicant with the 0.2% & 0.5% flood event. The 0.2% and 0.5% storm events need to be modelled as a proxy for increased rainfall and sea level rise with 0.9m tailwater condition. All flood mapping (maximums) need to be provided for climate change and sea level rise to enable a full assessment of the proposal as per the Bayside DCP section 9.5.4. 1% AEP + sea level rise/climate change afflux shall not exceed 10mm.	Based on Council's advice additional modelling for 2050 and 2100 climate change scenarios has been undertaken as per the DCP requirements using the endorsed model provided. Results indicate that proposed design floor level is above all scenarios of climate change (i.e. the freeboard is sufficient to allow for change in flood levels due to climate change). Affluxes above 10 millimetres (mm) were observed for the more extreme events and we are currently working through potential pathways to address these.	Agreed that CJA will provide this data and mapping with tidal change and rainfall for 2050 and 2100.
The PMF flood modelling in section 9.3 is incorrect as the warehouse level is set below the PMF flood level. This means the warehouse will become inundated by PMF floodwaters in a PMF flood event. This is not reflected in the modelling results.	The flood map was produced using the endorsed Council model as provided, which incorporates the buildings in the model as solid obstructions to flow (refer to Section 3.2.6 of Jacobs Floodplain Risk Study (Revision E, November 2020). This is a conservative modelling approach as it does not consider the flood storage within the building and a change to the building representation would fundamentally change the Council endorsed model as provided. We note that this is how the flood data and buildings are presented in the PMF event in the above-mentioned Jacobs report (refer to Mapping Figures B.4, B.8, B.12, B.14, B.16 and figure shown). And, also as presented in Councils flood advice letter dated 19 December 2023 (Council reference FA - 2023/233) Also, as presented in the Council interactive map (https://maps.bayside.nsw.gov.au/Intramaps98/?module=Flood). This is how the results were presented to Council in the pre-application meeting (21 February2024) and there was no request at that time from Council to present the data differently. We also note that it is fully understood by the development team (and the client) that in the PMF the building is inundated - this was noted in the text but can be emphasised if required.	Council mapping was prepared for precinct level and this presentation of buildings is acceptable. For site level studies Council expect more detail in the model and are concerned that data may be misinterpreted that the building is not inundated. CJA agreed to update the presentation of the data and accompanying text in the report to ensure it is clear that the building (and contents) are inundated.
A Manning's value map needs to be provided.	As noted in the report Section 9.1.3., the material layer in the model which represents surface roughness was unchanged from the original model as provided by council. A material layer map and table of roughness values used will be provided in the report update.	It was agreed that CJA would incorporate this map into the report

Council comment	Response	Meeting notes
Hydraulic category mapping was not provided in the pre and post development flood modelling for the full range of flood events. This shall be provided.	These additional maps can be provided for the results presented (although not a specific DCP requirement).	It was agreed that CJA will provide this mapping
Section 9.6.1 shows non-compliant flood afflux and doesn't provide a full picture of the flood afflux and wet/dry mapping. The afflux mapping doesn't correlate to the pre vs post flood mapping where large areas of flood are displaced by the redevelopment of the site. The 1% AEP flood afflux needs to be less than 10mm.	CJA will include wet/dry mapping in the updated report. The minor affluxes are observed due to increases in surface slopes in the design scenario. These areas are generally less than 1 m^2 for each pixel and do not impact neighbouring properties.	The reasons for the small areas of afflux were presented. It was agreed that maps will be updated to include wet/dry mapping.
PMF flood afflux mapping needs to be provided. PMF flood afflux needs to be less than 50mm.	Afflux maps will be provided. It is noted that modelling scenario 000BLK (unblocked) shows negative afflux (lower levels), while modelling scenario ARRBLK shows positive afflux of >300 mm (very small area that is a likely local effect of water flowing over the sewer culvert).	Council noted that despite the negligible impact of this afflux it is not acceptable to Council (i.e. doesn't meet requirements of DCP) and CJA need to investigate cause and provide mitigation.
Table 6 is incorrect; the 1% AEP flood level is shown to be RL 2.01 in figure 40.	Figure 40 is not the critical storm event for Hale Street, which is the controlling location for setting flood planning floor levels. The levels which are not relevant can be removed from these maps to avoid confusion.	It was agreed that composite maps representing the critical storms for each event will be presented to avoid confusion.
The types of fencing proposed to be utilised on the site must be clearly detailed. All fencing must be entirely flow through open form fencing.	A section in the report on fencing requirements will be included. Fencing will be detailed in appropriate drawing pack.	This was agreed with Council
It's not clear how the building is set at or above the flood planning level (1% AEP flood level + 500mm freeboard) given Council's flood model indicates flood levels of RL 2.92m directly to the west of the proposed building.	As discussed in the Council pre-application meeting, the spurious data along the western boundary is due to the LIDAR data in the Council model which is slightly different than the actual topography in this location, largely resulting from issues with LIDAR representation in the model. This was addressed through updates to the model surface, supported by survey levels in this location, as described in Section 5.4 of the report and shown in the data presented in Figure 15, 16, 17 and 18. There is no flood water >50 mm depth in this location for the 1% AEP.	CJA explained to Council that this was water trapped in the model due to misrepresentation of the ground level on this boundary. CJA will provide survey and photos and show the update surface does not result in water at these levels. A table comparing Council and updated results will be provided.
The development should investigate the feasibility of having warehouse levels set above the sea level rise/climate change 1% AEP flood level to future proof the building. The commentary in section 10.1.3 is not supported. It is not feasible for the development to rely on drainage upgrades in	Additional modelling as requested shows the proposed floor level (2.50 m AHD) of the building is already set above the 2100 climate change scenario.	Council will meet internally to provide response in terms of requiring freeboard above the 2100 climate change scenario. Council also queried compliance with

Council comment	Response	Meeting notes
the surrounding area to mitigate flood level impacts due to climate change/sea level rise.	The 500 mm freeboard provides sufficient protection for climate change scenarios. 000_BLK Design scenario 2050 CC - rainfall (0.5% AEP) and tidal increase of 0.4 m – FL 2.00 m AHD 2100 CC - rainfall (0.2% AEP) and tidal increase of 0.9 m – FL 2.37 m AHD ARR_BLK Design scenario 2050 CC - rainfall (0.5% AEP) and tidal increase of 0.4 m – FL 2.14 m AHD 2100 CC - rainfall (0.2% AEP) and tidal increase of 0.9 m – FL 2.44 m AHD. Raising the floor level above what is proposed is not considered feasible due to the following reasons: ▪ Increases in flood afflux for events >1% AEP due to filling of the site. ▪ Building height restrictions as a result of prescribed airspace limits ▪ Excessive driveway gradients for vehicular access to the site.	FRMM guidelines and BCS in relation to a waste facility in a flood plain and climate change.
The flood impact assessment does not address the flood mitigation measures.	Flood mitigation section to be included in the report to specifically address flood mitigation measures. These include: ▪ Adjustment of site levels to protect building and assets (1%+500 mm freeboard). ▪ 1% AEP flood storage volume maintained on site (in truck driveway entrance). ▪ Flow-through perimeter fencing to not impede flood flows. ▪ Substation location above 1% AEP plus freeboard.	This was agreed with Council.
The substation is to be flood proofed to the 1% AEP + 500mm level.	Section to be included in the report to ensure adequate flood protection of electrical substation to the 1% AEP + 500 mm freeboard. This will require coordination and discussion with the Electrical Engineers.	This was agreed with Council.
The emergency management strategy is not suitable for the area and insufficient measures are proposed to manage flood risk in the site operations. Flash flooding cuts off site access for a long flood duration. Early evacuation is not possible	This is not an issue that this development can mitigate. The main habitable areas of the building are set above the PMF (not at ground floor) and there are few options to escape the PMF given its extent	Council were unable to provide additional guidance as to what is an acceptable approach to emergency management in this situation.

Council comment	Response	Meeting notes
given the nature of the flooding as flash flooding and little to no warning times preceding flood events. The flood hazard in the road fronting the site is not compatible with off-site evacuation. It is not feasible to cease operations on site at the announcement of a BOM (Bureau of Meteorology) flooding severe weather warning given the site has a heavy influx of transient community (truck drivers) who are customers of the site and not employed as part of the business. There is no ability for pedestrians to evacuate the site. Hale Street floods very frequently directly in front of the primary access point which can significantly inhibit site operations.	and severity. What development IS considered appropriate in this catchment?	Council noted a development application for a logistics warehouse in Lord Street (with similar flood issues) was knocked back (did not proceed), not just by Council but also by BCS (Biodiversity Conservation and Science Group of the NSW Department of Climate Change, Energy, the Environment and Water). When asked if Council had flood mitigation works planned for this area it was noted that there was nothing planned for this area in the near future.
The proposal to shelter in place is not acceptable given the significant duration of flooding which completely isolates the site for 22 hours in the 1% AEP and 7-10 days in the PMF event. Further, there is no accessible path of travel to the mezzanine for people with a disability to evacuate to in a flood event. There is no confirmation that the mezzanine office can accommodate all people.	CJA engaged with the SES prior to lodgement to seek their feedback on our proposed flood emergency management plan. The SESwere not opposed to shelter in place, however were concerned about the transfer of risk. The applicant also notes that the requirement for a shelter in place strategy is not as a result of this proposed development and Council has acknowledged that Hale Street floods very frequently directly. CJA would welcome any suggested alternative strategies that the Council knows have been successfully adopted at other developments in similar flood conditions in this flood plain. Appendix G - Flood Emergency Management Plan, Section 4.2.2, Text and Figures 23 and 24 were referred to and clearly show the office layout and the area and peak number of people which confirms they can be accommodated.	Council admitted they may have missed the information regarding the office space and number of people. They are not aware of other developments in the area that have acceptable plans - refer previous comments about Lord Street Logistics Warehouse.
The emergency management plan is not fit for purpose as it is not prepared for the intended audience being the employees and visitors. References to the existing development are irrelevant. The information is overly technical and needs to be presented in layman's terms.	The purpose of the emergency management plan is to inform authorities how CPG intend to manage the risks and implement emergency management on the site and will be refined during detailed design. CJA also note that the format and information provided follows a previously approved EMP for another SSD project and guidance from the Flood Emergency Planning for Disaster Resilience Handbook (AIDR). CJA do not believe that making this technically simple is appropriate	It was agreed that commentary / discussion on flood risk and emergency management is provided within the flood report and that a simpler EMP intended for employees and visitors for implementation on site is also provided.

Council comment	Response	Meeting notes
	for referral authorities. The final documentation for implementation onsite is a different document and much more geared towards onsite staff operations (not statutory authorities). CJA can clarify the intended audience in the introduction of the report if required.	

Following the meeting, comments from Council's stormwater and floodplain engineer were provided via email on 20 November 2024:

As discussed, the floor level requirement of this development must be the 1% AEP Level including 0.9m sea level rise + 0.5m freeboard. This item was raised by the NSW Government Biodiversity, Conservation and Science division who advised this needs to be addressed to comply with the NSW Government's Flood Risk Management Manual. This is deemed necessary due to the significant flood risk posed to this development due to sea level rise, which will occur within the design life of the building. It will also assist in reducing the high risk to life due to the high hazard flood conditions of this area which pose a risk to life. There are also significant environmental impacts of the development being flooded and washing the waste stored on site into Botany Bay.

Note this control does not change the significant risk faced by this development and its occupant as it will still be subject to extreme flood conditions, high hazard flooding and significant isolation times during a flood event which are not consistent with the NSW Government's Floodplain Risk Management Manual.

CPG and CJA interpret the BCS submission differently to Council and undertook additional flood modelling which confirmed the designed freeboard is performing adequately for the climate change scenarios; they do not believe BCS is asking for 'the floor level requirement of this development must be at the 1% AEP level, including 0.9 m seal rise + 0.5 m freeboard', as BCS's statement is that 'the consent authority needs to be satisfied that the risks associated with rising sea levels in low lying areas around Foreshore Road are appropriately considered for flood risk management of the site' which has been achieved through the additional flood modelling and FEMP. A detailed response to BCS comments is provided in Section 4.3.

Landscaping

Representatives from CJA, CPG, KLF and Element attended a meeting with Council on 12 November 2024 to clarify and discuss the response to Council's comments. Overall Council had positive feedback to CJA's proposed response. Council's comments, concerns and the meeting notes are detailed in Table 3.3. A detailed response to Council's comments is provided in Section 4.2.5.

Table 3.3 Council landscape comments and response

Concern	Council comment	Response
Proposal should identify new plantings on plan	Council are satisfied with response.	CJA hope to achieve a minimum of 15 trees.
Improvements to public domain	Developer needs to improve the frontage of the site. It can be a condition of consent, prior to the occupation certificate. Prior to construction certificate, a frontage works application is required. It might be an opportunity to put street trees somewhere else along the frontage. Good to see how the landscape we are proposing and how it will look with the public interface.	CPG are willing to consider a planted nature strip but seek further guidance on what Council like to see in the public domain.
Tree removal	Council acknowledges and understands.	CPG are not proposing to remove trees in the south-east, despite recommendation from the arborist.
Tree species	What trees are we proposing in the front setback?	Vegetation proposed in the front setback is required to be below 8 m in height and as such CPG

Concern	Council comment	Response
		is looking to plant *Banksia integrifolia*. (Council were showed a 3D representation).
Parking landscaping and canopy	Happy with canopy in the parking area. In elevations it previously looked quite bare, but canopies will provide softening from the street.	Council were shown the proposed landscape plans.
DCP Deciduous tree requirement for shading	Deciduous tree requirement is probably not necessary. Any deciduous tree that can fit in the parking area they are fine with. There is a list in the landscape technical guide. It is not a requirement for a deciduous tree as we have a lot of other space, it will be up to us if we want to add one.	CPG prefer not to add a deciduous tree but can implement this if desired by Council.
10% DCP landscaping requirement	Can we reach the 10% landscaping requirement?	The crushed granite area is required to reach the 10% landscaping requirement. CJA will make it clear what the landscaped area to the west of the warehouse will be.

3.3.2 Department of Planning, Housing and Infrastructure

Representatives from CPG, KLF and Element attended a meeting with DPHI on 12 November 2024 to provide an update on the progress of the response to submissions. The following outcomes were noted in this meeting:

Table 3.4 DPHI discussion and response

Discussion point	Response section
CPG summarised the refinements to design and the outcomes of the Council meetings.	See section 3.1.1 and 3.3.1.
Traffix had previously suggested that consultation with the local traffic committee was not relevant for the project. DPHI agreed that if CPG have the evidence that the local traffic committee did not operate in a relevant way, by having a concurrence role on removal of on-street parking in the Bayside LGA, that they could not argue with this approach.	See Table 4.7 of this report and Table 1 of the TIA.
DPHI requested confirmation that the swept path analysis had been resolved, which CPG relayed there should be no issues.	Updated swept path analyses have been provided in Appendix E of the TIA.
DPHI requested that Traffix look at the roundabout near the site that is associated with congestion and can cause queuing. DPHI would like to ensure that road safety and performance have been considered when trucks are exiting right out of the site and if there is any conflict with queuing traffic from the roundabout, as the trucks will have to cross this lane.	See Table 4.7 of this report and Table 1 of the TIA.
Following a summary of flood submission responses, CPG reiterated that flooding is generally an issue in this area. DPHI will take into account that the area has a flooding issue and that	See Section 2 and 11.1 of the flood impact assessment.

Discussion point	Response section
the project is reducing the level of risk. DPHI advised that consultation will be carried out with Council and BCS when the submissions report is finalised and following this advice will make a final determination on the application.	

Element and CPG received an email from DPHI on 21 February 2025 providing general feedback from the merit review of the submissions report and associated appendices detailed in the table below.

Table 3.5 DPHI merit review comment and response

Concern	DPHI comment	Response
General	Submission and government agency number incorrect	This has been updated in Section 1 and 2.
	Government agencies provide 'advice' rather than 'submissions'.	This has been updated in Section 2 and 4.
	Clarify if Table 1.1 regards the outcomes of the updated report or a review of the original assessments.	Table 1.1 provides a summary of key environmental assessments from the EIS. The caption and reference to the table in Section 1.4 has been updated.
	A cross-reference table should be provided in section 3.3.2 to clarify where in the SR and/or technical reports the issues raised by DPHI have been addressed.	Table 3.4 has been provided.
Flooding	The response regarding the proposed shelter in place strategy should have consideration for the new Shelter-in-Place guideline for flash flooding (DPHI, 2025)	This has been included in Section 4.2.2 - Appendix G: Flood Emergency Plan and Table 1.1.5 of Appendix D: flood impact assessment. It is acknowledged that the new guidelines provide clear and consistent guidance however it this guidance was only published in January 2025, and not available prior to merit review. It has been included in the updated FEMP – Appendix G of Appendix D. The proposed strategy largely complies with this guidance apart from the duration of shelter-in-place, which the guidelines require less than 12 hours from commencement of the rainfall and the hazard levels for the PMF which fall outside the guidelines. This area of Botany has a unique flood behaviour imposed on it due to the above ground sewers and restricted authority drainage resulting in fast water level rise and high water depths for extended periods for large storm events (in excess of 1% AEP).

Concern	DPHI comment	Response
		Evacuation is the primary response for this site. The shelter in place strategy is a last resort in the Hale Street FEMP and given the currently available technology used by the BOM to assess weather systems that sufficient notice of such extreme events will be given to enable evacuation of the site. This is the preferred option as per the FEMP. The proposed strategy is the only practical option in this part of Botany given the nature of existing flood conditions and resultant constraints. In most cases evacuation from the site is possible and the option of last resort is not likely to be used. The proposed ability to shelter in place for these rare events is a large improvement over current conditions for the site which provides no ability to shelter at all and is currently totally reliant on SES for rescue in a large flood event. It is also noted that this existing situation is not limited to the site but is true for a large portion of this area in Botany where the current emergency strategy is evacuation and there is no alternate option for when evacuation is not possible due to flash flooding, thereby leaving no escape and no place to go. The nature, severity and extent of the existing flood conditions in this part of Bayside is not something that can be addressed solely by this development.
	CJ Arms refers to another SEARs/SSD project in their response to Council's comments. Please confirm which project is being referenced here as a precedent.	The Manildra-Port Kembla Bulk Liquid Storage Facility was the project in question. This has been updated and expanded on in Table 1.1.5 of Appendix D: flood impact assessment.
Water take and licensing	The submissions report does not quantify the maximum potential groundwater take during removal of the UST tanks and construction works as recommended by DCCEEW-Water. The response must consider whether the approach proposed by the Applicant is consistent with the requirements of the NSW Groundwater Toolkit.	Groundwater take has been estimated by CPG and is provided in Table 4.6 and Appendix P.

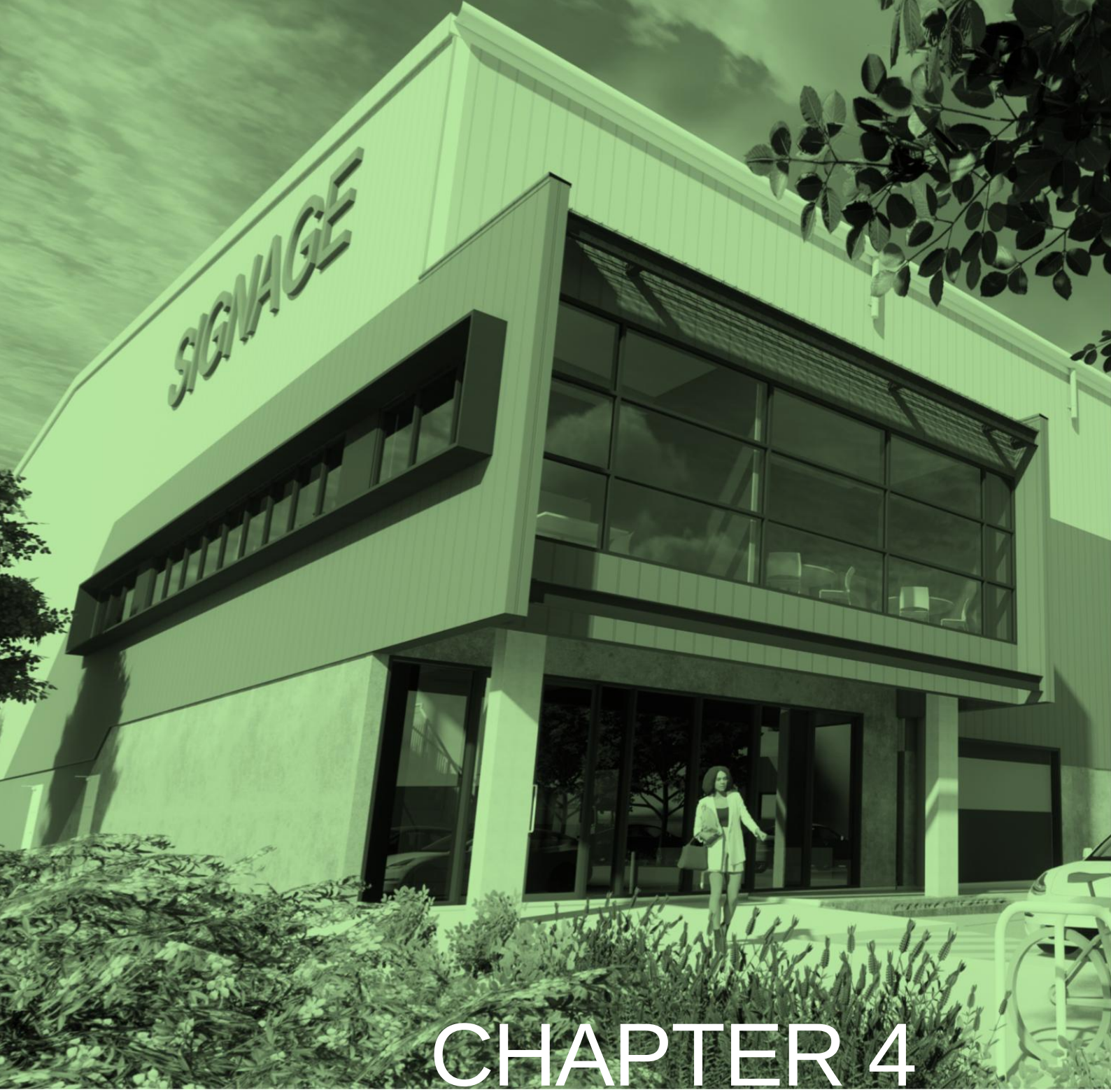
Concern	DPHI comment	Response
Traffic	Previous revisions of the TIA should be incorporated into the Document Verification table in the TIA.	This has been included in the updated traffic impact assessment – Appendix C.
Integrated water management strategy	The plans at Appendix B should be provided at a higher resolution as the details of the stormwater system are not legible.	Appendix B has been updated to include high resolution stormwater plans.
Aboriginal cultural heritage	Details of the final round of consultation with the RAPs must be included in the final submission report.	Details of consultation with the RAPs has been included in section 4.7.1 of this report and section 3.0 of Appendix I.
	The Test Excavation Methodology is still marked as draft and is undated.	The final, dated Test Excavation Methodology has been included as Appendix I.
DSI and RAP	Neither of these reports have a version / document table to confirm the updates. Please confirm where in the documents the updates have been made to enable these changes to be easily reviewed.	Section 573.8 of the DSI report – Appendix M and section 6.3.2 of the RAP – Appendix N have been updated to include SafeWork NSW dangerous goods records. Version/ document tables were provided at the end of both reports.

DPHI recommended that the response regarding the proposed shelter in place strategy should have consideration for the new Shelter-in-Place guideline for flash flooding (DPHI, 2025). A follow up meeting with DPHI, Element and CPG was held on 21 March 2025 to put forward the approach to the new guidelines by CPG. The following outcomes were noted in the meeting:

Table 3.6 DPHI Shelter-in-Place Guideline discussion and response

Discussion point	DPHI comment	Response
CPG emphasised that evacuation is the primary strategy not shelter-in-place and this will be reflected in the flood emergency response.	DPHI are satisfied with response.	For full response see section 4.3 of Appendix G: Flood Emergency Plan of Appendix D: flood impact assessment.
Staff will be evacuated in a timely manner.	The time taken to evacuate the site needs to be included.	This has been conservatively assumed as 20 minutes. See Section 4.2 – Appendix G of Appendix D.
CPG acknowledge the site may become isolated by flash flooding for shorter, more intense rainfall events, however the duration of isolation complies with the new guidelines and the building does not become inundated.	DPHI are satisfied with response. CPG should include contingencies if the requirements are not met.	See section 4.3.2 of Appendix G of Appendix D.
We are putting forward a much lower risk development than what is currently there.	DPHI agree that it is a good point to make	See Section 10.2 of Appendix D.

On 18 March 2025 DPHI received late advice from NSW Ports regarding the proposed development. A response has been included in section 4.8.



CHAPTER 4

RESPONSE TO GOVERNMENT AGENCIES

4 RESPONSE TO GOVERNMENT AGENCIES

The government agencies advice is addressed in this chapter. **Bold** text is an exact reproduction of the advice received, while normal text is the response to advice. A table has been utilised where government agency comments are extensive.

It is noted that the following agencies did not raise any specific issues or objections relating to the EIS that required addressing and have not been considered further in the RTS:

- Air Services Australia.
- CASA.
- FRNSW.
- Heritage NSW - cultural heritage
- Jemena.
- Sydney Airport.
- TfNSW.
- Water NSW.

4.1 Ausgrid

Ausgrid consents to the Waste Management Facility at Botany (SSD-62855708) development subject to the following conditions: -

The applicant/developer should note the following comments below regarding any proposal within the proximity of existing electrical network assets.

Ausgrid Underground Cables are in the vicinity of the development.

Special care should be taken to ensure that driveways and any other construction activities do not interfere with existing underground cables located in the footpath or adjacent roadways.

It is recommended that the developer locate and record the depth of all known underground services prior to any excavation in the area. Information regarding the position of cables along footpaths and roadways can be obtained by contacting Before You Dig Australia (BYDA).

In addition to BYDA the proponent should refer to the following documents to support safety in design and construction:

SafeWork Australia – Excavation Code of Practice. Ausgrid's Network Standard NS156 which outlines the minimum requirements for working around Ausgrid's underground cables.

The following points should also be taken into consideration.

Ausgrid cannot guarantee the depth of cables due to possible changes in ground levels from previous activities after the cables were installed.

Should ground levels change above Ausgrid's underground cables in areas such as footpaths and driveways, Ausgrid must be notified, and written approval provided prior to the works commencing.

Should ground anchors be required in the vicinity of Ausgrid underground cables, the anchors must not be installed within 300mm of any cable, and the anchors must not pass over the top of any cable.

Ausgrid Kiosk Substation in the vicinity of the development.

The substation ventilation openings, including substation duct openings and louvered panels, must be separated from building air intake and exhaust openings, natural ventilation openings and boundaries of adjacent allotments, by separation distances which meet the requirements of all relevant authorities, building regulations, BCA and Australian Standards including AS 1668.2: The use of ventilation and air-conditioning in buildings - Mechanical ventilation in buildings. In addition to above, Ausgrid requires the substation ventilation openings, including duct openings and louvered panels, to be separated from building ventilation system air intake and exhaust openings, including those on buildings on adjacent allotments, by not less than 6 metres.

Any portion of a building other than a BCA class 10a structure constructed from non-combustible materials, which is not sheltered by a non-ignitable blast-resisting barrier and is within 3 metres in any direction from the housing of a kiosk substation, is required to have a Fire Resistance Level (FRL) of not less than 120/120/120. Openable or fixed windows or glass blockwork or similar, irrespective of their fire rating, are not permitted within 3 metres in any direction from the housing of a kiosk substation, unless they are sheltered by a non-ignitable blast resisting barrier.

The development must comply with both the Reference Levels and the precautionary requirements of the ICNIRP Guidelines for Limiting Exposure to Time-varying Electric and Magnetic Fields (1 HZ – 100 kHZ) (ICNIRP 2010).

For further details on fire segregation requirements refer to Ausgrid's Network Standard 141.

Existing Ausgrid easements, leases and/or right of ways must be maintained at all times to ensure 24-hour access. No temporary or permanent alterations to this property tenure can occur without written approval from Ausgrid.

For further details refer to Ausgrid's Network Standard 143.

New Driveways - Proximity to Existing Poles
Proposed driveways shall be located to maintain a minimum clearance of 1.5m from the nearest face of the pole to any part of the driveway, including the layback, this is to allow room for future pole replacements. Ausgrid should be further consulted for any deviation to this distance.

New or modified connection
To apply to connect or modify a connection for a residential or commercial premises. Ausgrid recommends the existing substation on site remain in-situ until a replacement is commissioned if necessary.

Ausgrid recommends the proponent to engage an Accredited Service Provider and submit a connection application to Ausgrid as soon as practicable.

CPG have no concerns with the recommended conditions. CPG will engage BYDA services and an accredited service provider and submit a connection to Ausgrid.

4.2 Bayside Council

4.2.1 Traffic

Council's comments concerning the project as contained in a letter dated 9 September 2024 and email correspondence dated 3 December 2024 were addressed by Traffix as summarised in Table 4.1

Table 4.1 Bayside Council traffic comments response

Council comment	Response
Traffic, parking and access	
The intersection of Hale Street and Foreshore Road (East Hale Street Right turn) operates at intersection Level of Service (LOS) F in the post development scenario which is not supported. The intersection requires improvements to provide a satisfactory level of service.	▪ RTA Guide to Traffic Generating Developments (2002) specify that traffic modelling for signalised intersections should be based on the average delay over all movements, and not individual approaches. ▪ Updated SIDRA modelling results and findings in Section 9 of Appendix C, demonstrate the intersection of Hale Street and Foreshore Road operates satisfactorily at Level of Service (LoS) C or better under all assessment scenarios. ▪ There is subsequently no requirement to upgrade the intersection.
Council has significant concerns for vehicle and truck queueing on Hale Street both eastbound and westbound. This precinct has a single entry and exit point for large trucks being the intersection of Hale Street and Foreshore Road.	▪ All trucks will be required to enter the site from General Holmes Drive and there will be no queueing of trucks in the westbound direction. ▪ The commercial driveway will remain open at all times during operational hours to facilitate free flow for all truck ingress and egress movements such there will be no queuing of trucks in the eastbound direction ▪ Detailed queuing analysis has been undertaken in Section 9.8 of Appendix C and confirm it is statistically improbable for trucks to queue on the public road under extremely conservative operational assumptions, and sufficient space will be made available on site prior to any truck arrivals at all times. Therefore, the former assessment stating that traffic will be rerouted is no longer relevant nor required.
Hale Street westbound queues	
Hale Street at the intersection with Foreshore Road already experiences lengthy queues over the bridge in peak hours. The existing configuration of this intersection with limited queueing capacity results in queues building up quickly. Additionally, the large trucks proposed in this development (26m long B-doubles) will add significantly to these queues. There is a high likelihood that these westbound queues on Hale Street will extend in front of the driveway, resulting in queuing of trucks on-site.	▪ Refer to updated SIDRA modelling results and findings in Section 9 of Appendix C, which demonstrates the intersection of Hale Street and Foreshore Road operates satisfactorily at LoS C or better under all assessed scenarios. ▪ Any queuing extending to the site access driveway, which has been strategically positioned as far practicable from General Holmes Drive is not expected to impact site operations. In any event, any queueing internal to the site has no implications to the road network operations.
Hale Street eastbound queues	
Concerns are raised that if the site is at capacity, there is no possibility for trucks to turn around on Hale Street and hence trucks will be forced to queue on the road blocking traffic.	▪ Detailed queuing analysis has been undertaken in Section 9.8 of the TIA (Appendix C) and confirm it is statistically improbable for trucks to queue on the public road under extremely conservative operational assumptions, and sufficient space will be made available on site prior to any truck arrivals at all times. Therefore, the former assessment stating that traffic will be rerouted is no longer relevant nor required. ▪ Council's concerns can be satisfactorily addressed in a site operational management plan which can be prepared in response to a suitable condition of consent.

Council comment	Response
Section 6.12 states that queuing will be managed by staff who will re-direct trucks if the site becomes congested. This is not a feasible management measure. It's expected that many different types of trucks and drivers will be visiting this site and there is limited opportunity to control arrivals/departures to avoid congestion. A slip lane needs to be investigated along the frontage of the site to allow room for truck queuing whilst allowing for other vehicles to pass and continue driving eastbound. The development is proposing to remove the vast majority of on-street parking on the northern side of Hale Street given the driveways and swept paths. Some road widening will be necessary. There is also the ability for the Hale Street centreline to be better aligned with the bridge centreline as part of this upgrade.	▪ Detailed queuing analysis has been undertaken in Section 9.8 of the TIA and confirms it is statistically improbable trucks to queue on the public road under extremely conservative operational assumptions, and sufficient space will be made available on site prior to any truck arrivals at all times. Therefore, the former assessment stating that traffic will be rerouted is no longer relevant nor required.
It's not clear as to how the vehicle trips per day were determined using first principles in section 6.10 of the traffic report and this needs to be clarified. It should also be supplemented by traffic surveys of a similar sized facility.	▪ TIA has been updated in Appendix C to provide detailed calculations on how the anticipated heavy vehicle trip generation associated with the project has been estimated, including a breakdown of the vehicle types (refer to Section 9).
The duration that trucks will be present on site for sorting and unloading of waste, including loading/collection of materials, needs to be determined. A survey of similar developments shall be provided to understand the time necessary for trucks to be on site to undertake these activities.	▪ Refer to Section 9.8 of the TIA (Appendix C).
It's not clear how off-site removal of waste will be organised and how that will be managed with incoming deliveries.	▪ Council's concerns can be satisfactorily addressed in a site operational management plan which can be prepared in response to a suitable condition of consent.
Concerns are raised regarding the swept paths of 20m long AV and 26m B-Double conflicting with on-street parking on the southern side of Hale Street. The appendix D swept paths shall be revised with that southern on-street parking shown as minimum 2.4m wide from face of kerb. Swept paths can be undertaken on the assumption that parking on the northern side will be removed. Truck movements including 300mm clearance are not to impact on-street parking.	▪ Swept path analysis have been updated in Appendix C with recent Nearmap aerial georeferenced in the background and clearly demonstrates 26m B-double vehicles will be able to ingress and egress the site satisfactorily in accordance with AS 2890.2 (2018).
The appendix D swept path analysis details an unrealistic kink in the truck wheel movement near the car entry/exit. See figure below.	▪ All swept path analysis has been undertaken using the latest version of the industry leading software AutoTURN Pro. ▪ CPG would be pleased to facilitate animated swept paths in a video file or live demonstration to Council upon request to demonstrate the integrity of the analysis.
The swept path analysis shall be revised to better depict all line marking on Hale Street. Vehicles shall not cross over the road centreline.	▪ Swept path analysis have been updated in Appendix C with recent Nearmap aerial georeferenced in the background and clearly demonstrates 26m B-double vehicles will be able to ingress and egress the site satisfactorily in accordance with AS 2890.2 (2018).

Council comment	Response
The parking rate derived in section 7 of the traffic report is insufficient for this site. 1 car parking space shall be provided for each staff member in addition to the 4 visitor spaces. Additionally, given the swept paths and the two driveways proposed, the onstreet parking on the northern side of Hale Street is effectively entirely removed by this development. The loss of public parking needs to be supplemented by the development.	▪ The project design has been amended to provide a minimum of one car parking space per FTE staff in addition to the four visitor spaces in accordance with Council's request. ▪ There is subsequently no requirement to occupy street parking for the project. ▪ Refer to Section 8.6 of the TIA (Appendix C).
A longitudinal driveway profile is to be submitted for each driveway. The profiles shall start in the centre of the road and be along the critical edge (worst case) of the driveway. Gradients and transitions shall be in accordance with AS2890.1:2004 & AS2890.2:2018. The profile shall include all relevant levels, grades (%), headroom clearances and lengths. The existing boundary levels shall be clearly shown on the profile. Any change to the existing boundary levels requires approval from Bayside Council.	▪ A longitudinal driveway profile has been prepared demonstrating compliance with AS 2890.1 (2004) and AS 2890.2 (2018) and has been submitted as part of the updated design plans.
Internal driveway gradients shall be clearly shown on the plans complying with AS2890.1:2004 and AS2890.2:2018.	▪ Internal gradients have been clearly shown on the plans demonstrating compliance with AS 2890.1 (2004) and AS 2890.2 (2018) and has been submitted as part of the updated design plans.
The swept paths indicate all turning movements (to allow trucks to enter and exit the site in a forward direction) will occur within the warehouse where waste is being sorted. More details need to be provided demonstrating why this is acceptable and, as to how a dedicated area will be kept clear for vehicle manoeuvring particularly when unloading/sorting is occurring.	▪ The site will operate in a sequential arrangement meaning the likelihood of vehicles needing to overtake another truck is statistically improbable.
"Do not queue" marking signs need to be provided on the driveway entry/passing area and the turn around area.	▪ Council requirements noted. CPG are happy to comply with this requirement as a condition of consent.
The traffic modelling does not consider additional delays at the intersections from the follow issues: ▪ Delays from slow moving trucks are not considered in the SIDRA modelling. ▪ Delays from trucks occupying multiple travel lanes are not considered in the SIDRA modelling. ▪ Additional queue lengths from large vehicles (B-Doubles).	▪ Delays from slow moving trucks are in fact adequately considered in the SIDRA modelling by assigning respective volumes to appropriate vehicle classes. It is noted in this regard that the development related heavy vehicle trips has been assigned as 'Large Trucks'. ▪ Trucks do not need to occupy multiple lanes at the Foreshore Road/Hale Street intersection to perform any manoeuvres. The intersection is situated within a heavy industrial area along an existing national heavy vehicle register (NHVR) 25/26m B-double approved route in all directions and as such, can accommodate the movement of large trucks up to and including 25/26m B-double vehicles. ▪ Additional queue lengths from large vehicle have been adequately considered by assigning all development related heavy vehicle trips as 'Large Trucks'. ▪ Notwithstanding the above, the project results in a net traffic generation reduction during both the morning and afternoon peak periods. With this considered, no further traffic modelling would typically be warranted

Council comment	Response
	and the project is considered supportable from a traffic planning perspective and no external network improvements would be required.
Email comments dated 3 December 2024	
The responses to the Bayside Council RFI are acceptable except for the issue raised regarding the LOS and queuing experienced at the intersection of Hale Street and Foreshore Road. Council disagrees with the applicant's argument that the average delay of all movements means the intersection is operating satisfactorily. The Hale Street approach experiences excessive queueing in peak hours which is reflected in the poor LOS experienced on the Hale Street approach. This issue is evidenced in aerial data and site observations where westbound queuing often extends well beyond the bridge. The applicant needs to implement measures as part of this development to improve the LOS, queue length, degree of saturation etc. experienced on the Hale Street approach. Additionally, the applicant should investigate having the car entry/exit driveway revised to be in a location that reduces the loss of on-street parking.	▪ Traffic modelling has been undertaken and interpreted in accordance with TfNSW Guide to Traffic Impact Assessment (TS 00085, Ver 1.1) and TfNSW Traffic Modelling Guidelines (Ver 1.0) which demonstrates the Foreshore Road / Hale Street intersection will continue to operate at satisfactory LoS C or better. ▪ The project results in a net reduction in the vehicle generation potential of the site compared to the existing approved development, which aligns with Council's objective of alleviating road network capacity and street parking concerns. ▪ Given that the project results in a net reduction in the traffic generation of the site and SIDRA modelling undertaken in accordance with TfNSW guidelines demonstrates satisfactory operation of the key intersections, there is no requirement for any road infrastructure improvements. ▪ CPG has investigated alternate location of the entry/exit driveway and reaffirms the current proposed location is optimal in terms of operational efficiency and safety, as well as to minimise any impacts to the existing road network to address DPHI and Council concerns. It should also be noted the width of the driveway does not change with its location, and as a result modification of on-street parking is unlikely to be different for different driveway locations.

4.2.2 Surface water

Stormwater management comments from Council and CPG's response are detailed in Table 4.2

Table 4.2 Bayside Council stormwater management comments response

Council comment	Response
A set of stormwater plans prepared by a suitably qualified civil engineer were not provided. As a result, the development cannot be assessed to determine if it satisfies clause 6.3 and clause 5.21 of the Bayside LEP and the requirements of the Bayside DCP (section 3.9, 3.10 and 9.5). These plans need to be provided to enable the development to be fully assessed.	A revised and more detailed concept have been provided in Appendix B of the integrated water management strategy (Appendix F). The provision of a full set of detailed design plans is not typical at this stage of a development application, however the concept design information now included in Appendix B should facilitate merit review.
There is a limited number of plans accompanying the development proposal. In the architectural plans submitted there are no details of design surface levels across the site. Full details of design surface levels across the site are necessary to inform the assessment of the development (particularly the flood impact assessment). A civil grading plan and a cut/fill bulk earthworks plan needs to be provided to understand and assess the design surface levels across the site. The	Updated architectural plans with design surface levels across the site have been provided in Appendix A of the Integrated water management strategy (Appendix F).

<table>
<tr><th>Council comment</th><th>Response</th></tr>
<tr><td>gradients on the driveway to the warehouse need to comply with AS2890.2:2018. The levels in the civil grading shall be reflected in the architectural design.</td><td>The gradients from the street to the building are indicated on Appendix B of Appendix Fand are considered practical and compliant with AS2890.2.
A cut and fill plan has been prepared by comparing design versus existing surfaces and is appended in Appendix E of Appendix F.</td></tr>
<tr><td>The stormwater plans shall include the following details at minimum:
Site layout;
Surface and roof drainage plans;
Existing site contours and final design levels;
WSUD catchment plan;
Finished floor levels and footprints of the proposed development/ structures;
Location and size of the internal and external drainage systems, rainwater re-use system, flood storage tank systems;
Levels and location of discharge points for the stormwater system including design details of the Hale Street drainage extension;
Cross–sections details of the rainwater tanks and flood storage tank;
Maximum water surface levels in each storage;
Details of surcharge/overflow paths for the major storm;
Location and manufacturer spaces of stormwater quality improvement devices; and
Flood storage tank base plan is to be provided, showing all base levels and minimum 1% fall towards the outlet pipe;
A lid plan is to be submitted for the flood storage tank; showing the distance from pit centre to centre. The grates spacing of the access grates to be as per Section 6.6.2 of Bayside Technical Specification Stormwater Management.
Full details of the bioretention system including manufacturers details.
Construction and operational phase sediment and erosion control plan.</td><td>A revised and more detailed concept have been provided in Appendix B of the integrated water management strategy (Appendix F). The provision of a full set of detailed design plans is not typical at this stage of a development application, however the concept design information now included in Appendix B should facilitate adequacy review.</td></tr>
<tr><td>Engineering design certification shall be submitted for the stormwater design.</td><td>As mentioned above, the design certification will be submitted with detail designs.</td></tr>
<tr><td>Council raises no objection to not having an OSD for the development. However, the approach to designing the flood storage tank in section 5.6 is incorrect. It needs to be designed as a flood mitigation measure (e.g., to offset proposed fill on the site) and be calculated through the flood modelling.</td><td>Section 5.6 of Appendix F has been updated to provide additional context to the flood modelling processes.</td></tr>
<tr><td>The water quality improvement targets quoted in sections 5.8 & 5.9 of the “Integrated Water Management Report” are incorrect. The correct targets are as per section 7.1.1 table 5 of Bayside Technical Specification Stormwater Management shown below:<table><tr><th>Stormwater Pollutant</th><th>Pollutant Reduction</th></tr><tr><td>Gross pollutants</td><td>90%</td></tr><tr><td>Total suspended solids (TSS)</td><td>85%</td></tr><tr><td>Total phosphorous (TP)</td><td>60%</td></tr><tr><td>Total nitrogen (TN)</td><td>45%</td></tr></table></td><td>The stormwater treatment train has been updated in Section 5.8 and 5.9 of Appendix F to achieve council treatment targets.</td></tr>
</table>

Council comment	Response
The MUSIC modelling undertaken is consequently incorrect. The MUSIC modelling must be revised to demonstrate the abovementioned pollutant reduction targets are met or exceeded.	
Furthermore, figure 5 of this report cannot be assessed as it does not include the areas of each catchment and is not supplemented by stormwater plans verifying the catchment areas and demonstrating the treatment train is feasible.	Refer to Table 4 in Section 5.8 of and the catchment area plan in Appendix C of Appendix F
The parameters of the bioretention system in the MUSIC model shall be shown. The bioretention system appears to be overperforming and it's not clear how the site will effectively capture gross pollutants from impervious areas. Furthermore, it needs to be detailed how this system will work given the substation and trees proposed in this area.	A copy of the MUSIC file is provided in Appendix G of Appendix F for Council review.
A soft copy of the amended MUSIC modelling shall be provided.	A copy of the MUSIC file is provided in Appendix G of Appendix F for Council review.
A WSUD catchment plan highlighting the impervious and pervious areas for water quality treatment including areas which bypass the treatment system should be provided. The WSUD catchment plan shall be aligned with the MUSIC modelling and shall be scaled with the architectural plan in the background. The MUSIC modelling shall be consistent with the WSUD catchment plan.	Refer to Table 4 in Section 5.8 of and the catchment area plan in Appendix C of Appendix F
The fuel tank must be bunded, located under a roof structure and drained directly to the Sydney water sewer.	No run-off from the fuel dispensing area is to be directed to the stormwater system. This is shown on the architectural drawings and reflected in the updated civil concept plan.
The plans propose an extension of Council's Hale Street drainage infrastructure. A surveyor must be engaged to determine all relevant levels (e.g., the invert levels) of this infrastructure.	CPG will carry out this requirement during detailed design of the project.

4.2.3 Flooding

Council's floodplain management comments and CPG's response are detailed in Table 4.3.

Table 4.3 Bayside Council floodplain management comments response

Council comment	Response
The flood impact assessment does not address the requirements of section 9.5.4 of the Bayside DCP and the NSW Flood Risk Management Manual which is not supported. Therefore, a full assessment of the developments flood impacts cannot be undertaken given the information submitted. The following issues are identified in the flood impact assessment:	Responses to the issues identified by Council are presented below.
The presentation of the flood data is not to industry standard and excessively lengthens and confuses the flood report. All storm durations, temporal patterns and blockage scenarios for each AEP storm event and development scenario need to be combined into maximum results grids. All flood modelling outputs need to be re-done. Currently Council cannot make an informed assessment due to how the flood mapping has been presented.	Refer to section 8.1 and 9.2 of Appendix D The flood data has been provided to industry standard where possible and within the limitations of the flood model provided and is a result of the extensive number of flood events and blockage scenarios requested by Council to be modelled. Notwithstanding, 1% AEP maps have been updated to composite maps that represent all critical storms relevant to the site.

Council comment	Response
It's unclear how the site has been modelled outside of the building footprint. The architectural plans do not provide sufficient information of design levels outside of the building footprint. There are no civil engineering (stormwater) plans accompanying the development. Given there is a lack of details with the SSD supporting documentation, the flood modelling results cannot be confirmed to be accurate. For example, it's clear that the internal driveway will start at approx. RL 1.3m AHD at the Hale Street entry and will need to ramp up to RL 2.50m AHD at compliant gradients with AS2890.2. This inevitably means the site will be filled to different extents across the entire driveway. This fill needs to be modelled in the flood model as it will impact and displace floodwaters. A civil grading plan needs to be prepared for the site and the cut/fill across the site needs to be reflected in the flood modelling.	Existing survey information has been added to establish existing levels. The civil plan in Section 9.1.2 of Appendix D have been included with survey levels. Refer to civil plans for stormwater drainage plans. Flood storage volumes in Section 8.1.4 and 9.2.4 of Appendix D were calculated using the flood model.
The flood modelling is not undertaken to the requirements of section 9.5.4 of the Bayside DCP.	With regard to previous non-compliance with Section 9.5.4 of the DCP, the following is noted: ▪ Engineering qualifications are now included in Section 2.2 of Appendix D. ▪ Survey plan is now provided in Section 5.2 of Appendix D. ▪ PMF afflux is now provided in section 9.7 of Appendix D. ▪ Blockage conditions are confirmed in Section 7.2 of Appendix D in line with advice and modelling provided by Council in February 2024. ▪ Climate change modelling and subsequent mapping is now included in Section 10.1 of Appendix D.
The assessment in section 5.4 and the flood hazard shown in figure 7 is incorrect. This figure is inconsistent with Council's flood advice letter issued for the site. This assessment does not present a true description of the existing flood hazard which is H3 high hazard.	Hazard map has been updated in Section 5.5 of Appendix D reflecting Council's flood advice letter.
The third paragraph in section 7.1.1 and section of 7.4.3 is incorrect. Council has provided the applicant with the 0.2% & 0.5% flood event. The 0.2% and 0.5% storm events need to be modelled as a proxy for increased rainfall and sea level rise with 0.9m tailwater condition. All flood mapping (maximums) need to be provided for climate change and sea level rise to enable a full assessment of the proposal as per the Bayside DCP section 9.5.4. 1% AEP + sea level rise/climate change afflux shall not exceed 10mm.	Based on Council's advice, additional modelling for 2050 and 2100 climate change scenarios has been undertaken as per the DCP requirements in Section 10.1 of Appendix D using the endorsed model provided and subsequent mapping included. Due to limitations in model run times, the maps provided cover the critical events and critical location that controls flood planning levels (i.e. Hale Street). More detailed modelling will be provided during detailed design.
The PMF flood modelling in section 9.3 is incorrect as the warehouse level is set below the PMF flood level. This means the warehouse will become inundated by PMF floodwaters in a PMF flood event. This is not reflected in the modelling results.	Text has been updated in Section 9.3 of Appendix D to remove any doubt or confusion that the building and contents is flooded / inundated to the PMF flood level.
A Manning's value map needs to be provided.	An additional section is included in Appendix D (Section 7.3) with a table of Manning's values and a

Council comment	Response
	materials map showing how these were applied to the model in the existing conditions. Section 9.1.3 of Appendix D has also been updated with the same table and a map to reflect how the Mannings values and materials were applied in the design model.
Hydraulic category mapping was not provided in the pre and post development flood modelling for the full range of flood events. This shall be provided.	Additional hydraulic category maps are included in the following sections of Appendix D: ▪ Section 8.1.4. ▪ Section 8.2.4. ▪ Section 8.3.4. ▪ Section 8.4.4. ▪ Section 9.2.4. ▪ Section 9.3.4. ▪ Section 9.4.4. ▪ Section 9.5.4.
Section 9.6.1 shows non-compliant flood afflux and doesn't provide a full picture of the flood afflux and wet/dry mapping. The afflux mapping doesn't correlate to the pre vs post flood mapping where large areas of flood are displaced by the redevelopment of the site. The 1% AEP flood afflux needs to be less than 10mm.	As requested, wet/dry mapping has been updated in Section 9.6 of Appendix D. The minor affluxes are observed due to increases in surface slopes in the design scenario. These areas are generally less than 1 m² for each pixel and do not impact neighbouring properties.
PMF flood afflux mapping needs to be provided. PMF flood afflux needs to be less than 50mm.	Afflux maps provided for 000BLK (unblocked) and ARRBLK scenarios in Section 9.7 of Appendix D.
Table 6 is incorrect; the 1% AEP flood level is shown to be RL 2.01 in figure 40	Composite maps provided in Section 8.1 and 9.2 of Appendix D to include all relevant critical storms
The types of fencing proposed to be utilised on the site must be clearly detailed. All fencing must be entirely flow through open form fencing.	A section in the report on fencing requirements is now included (Section 10.5 of Appendix D).
It's not clear how the building is set at or above the flood planning level (1% AEP flood level + 500mm freeboard) given Council's flood model indicates flood levels of RL 2.92m directly to the west of the proposed building.	As discussed previously with Council, the spurious data along the western boundary is due to the LIDAR data representation in the Council model, which is slightly different than the actual topography in this location. Section 7.4.1 of Appendix D has been updated the model surface supported by survey levels in this location.
The development should investigate the feasibility of having warehouse levels set above the sea level rise/climate change 1% AEP flood level to future proof the building. The commentary in section 10.1.3 is not supported. It is not feasible for the development to rely on drainage upgrades in the surrounding area to mitigate flood level impacts due to climate change/sea level rise.	Refer to Section 10.1 of Appendix D. Additional modelling as requested shows the proposed floor level (2.50 m AHD) of the building is already set above the 2100 climate change scenario. Raising the floor level above the required planning level is not considered feasible due to the following reasons: ▪ Increases in flood afflux for events >1% AEP due to filling of the site. ▪ Building height restrictions as a result of prescribed airspace limits. ▪ Excessive driveway gradients for vehicular access to the site.
The flood impact assessment does not address the flood mitigation measures.	Section 10.5 of Appendix D now addresses flood mitigation measures.
The substation is to be flood proofed to the 1% AEP + 500mm level.	Section 10.5 of Appendix D has been included to ensure adequate flood protection of the electrical substation to the 1% AEP + 500 mm freeboard.

Council comment	Response
	The actual final location of the substation will be confirmed during detailed design and will require coordination and discussion with the energy authority.
The emergency management strategy is not suitable for the area and insufficient measures are proposed to manage flood risk in the site operations. Flash flooding cuts off site access for a long flood duration. Early evacuation is not possible given the nature of the flooding as flash flooding and little to no warning times preceding flood events. The flood hazard in the road fronting the site is not compatible with off-site evacuation. It is not feasible to cease operations on site at the announcement of a BOM flooding severe weather warning given the site has a heavy influx of transient community (truck drivers) who are customers of the site and not employed as part of the business. There is no ability for pedestrians to evacuate the site. Hale street floods very frequently directly in front of the primary access point which can significantly inhibit site operations.	It is noted that existing flood evacuation challenges are an existing condition which is not worsened or further impacted as a result of the project. The design of the project has taken all reasonable measures to reduce and mitigate risks to property and safety on the site. The main habitable areas of the building are set above the PMF (not at ground floor) and there are few remaining options to escape the PMF given its extent and severity. The nature, severity and extent of the existing flood conditions in this part of Botany is not something that can be addressed solely by this development.
The proposal to shelter in place is not acceptable given the significant duration of flooding which completely isolates the site for 22 hours in the 1% AEP and 7-10 days in the PMF event. Further, there is no accessible path of travel to the mezzanine for people with a disability to evacuate to in a flood event. There is no confirmation that the mezzanine office can accommodate all people.	The primary strategy for site evacuation is based on BOM warnings. The shelter in place strategy is a last resort for a limited number of events. The SES were consulted prior to lodgement to seek their feedback on the proposed flood emergency management plan (FEMP). The SES were not opposed to shelter in place, however, were concerned about the transfer of risk. CPG also notes that the requirement for a shelter in place strategy as a last resort is not as a result of this proposed development and Council has acknowledged that Hale Street floods very frequently directly. Council advised that they have no immediate plans to mitigate flooding in this area. Flooding that is primarily due to containment by Sydney Water sewer assets (SWSOOS) and limitations in authority drainage (both Council and Sydney Water assets). Appendix G of Appendix D (Section 4.2.2 and Figures 23 and 24) clearly show the office layout and the area and peak number of people which confirms they can be accommodated. It also addresses the issue of access for people with disabilities.
The emergency management plan is not fit for purpose as it is not prepared for the intended audience being the employees and visitors. References to the existing development are irrelevant. The information is overly technical and needs to be presented in layman's terms.	The purpose of the FEMP is to inform authorities how risks will be managed and how emergency management will be implemented on the site. It is not intended as a document for the Employees and Visitors which will be prepared during detailed design. CJ Arms also note that the format and information provided follows a previously approved FEMP for another SEARS project and guidance from the Flood Emergency Planning for Disaster Resilience Handbook (AIDR). CJ Arms believe the level of technical detail is appropriate for referral authorities being asked to comment. The final documentation for implementation onsite is a different document and much more geared towards onsite staff operations (not statutory authorities).

Council comment	Response
	CJ Arms have clarified the intended audience and purpose of the report in the introduction of the report. The purpose of the emergency management plan is to inform authorities how CPG intend to manage the risks and implement emergency management on the site and will be refined during detailed design. CJA also note that the format and information provided follows a previously approved EMP for another SSD project and guidance from the Flood Emergency Planning for Disaster Resilience Handbook (AIDR). CJA do not believe that making this technically simple is appropriate for referral authorities. The final documentation for implementation onsite is a different document and much more geared towards onsite staff operations (not statutory authorities). CJA have updated Appendix G of Appendix D and clarified the intended audience in the introduction of the report.

4.2.4 Soil and contamination

Council is satisfied with what the applicant has assessed and submitted at this stage. The only additional information that should be provided at this stage is a SafeWork NSW dangerous good search:

The Detailed Site Investigation (DSI) report is extensive and includes information that would be included in a PSI such as site history, historical aerials, surrounding land contamination records, and site inspection. However, there is no evidence of a SafeWork NSW dangerous goods search completed for the site. Given that two (Underground Storage Tanks) USTs were identified onsite, a dangerous goods search is required to confirm historical UST information. Search results should be added to the DSI appendices. The DSI and the auditor did not identify this data gap.

I would also recommend that the specifications of exact excavation depths be made. The proposal should follow the recommendations and conditions provided in the Audit Advice.

JBS&G have updated the DSI report (Section 3.8) and the RAP (Section 6.3.2) to include the SafeWork NSW dangerous goods records (attached as Appendix M and Appendix N). In short, the records do not change any of the findings/conclusions/management actions in either report but detail the following:

- The underground storage tank (UST) in the central portion is 21,000 L and was used to store petrol. The UST was installed around 1980 and reportedly abandoned/used from 1991. It was reportedly installed to a depth of approximately 2.1 m below ground surface.
- The operation within the warehouse in the north-western portion held a licence from 1995-2001 to store 800 L of adhesive that contained flammable liquids and adhesive cleaner liquids.

Council's recommendation to provide exact remedial excavation depths is not prudent given that it will be ultimately determined by the results of validation sampling during remediation works. Requirements to validate remedial excavation extents (both lateral and vertical) is provided in detail within Section 7 of the RAP (Appendix M).

4.2.5 Landscaping

Council's landscape comments are addressed in Table 4.4.

Table 4.4 Bayside Council landscape comments response

Council comment	Response
The Landscape Concept Plan identifies areas of the side and rear setbacks as contributing to the Landscaped Area. It includes these areas in the calculation of the total landscaped area on the site. However, the plans indicate these side and rear setbacks are to be entirely "Compacted gravel". It is not considered that a plain compacted gravel surface satisfies the intention, functions and definition of landscaped area.	Appendix H has been updated to introduce a planting buffer along the western and northern landscaped areas. This buffer will be planted around the perimeter of the site with the area between the planting and building to be finished with a 2 m wide permeable crushed granite or gravel to allow maintenance access for the fence, building and landscape.
The final Landscape Plan should be prepared by a qualified Landscape Architect who is a member of the AILA or is eligible for membership. The Landscape Plan should meet the requirements of the Bayside DCP 2022 and the Bayside Landscaping Technical Specification. The final Landscape Plan should show: ▪ Building envelopes, built structures, parking areas, circulation, access; ▪ Finished levels, existing levels of surrounding properties; ▪ Treatment of interface with adjoining land uses and public land; ▪ Stormwater structures proposed, ▪ WSUD elements details related to the site, with levels; ▪ Underground and overhead utilities, including drainage, fire booster valve assemblies and electrical kiosks; ▪ All planter beds and the layout, arrangement and labelling of plant materials including trees and shrubs; ▪ Labelling of all existing trees and vegetation to be removed and retained, including neighbouring trees and street trees; ▪ Include concept or thematic plans that indicate plant groupings for low shrubs and groundcovers and nominate all trees and large shrubs individual species; ▪ Public domain proposals (where applicable) – street trees, footpaths, landscaping, bike racks, lighting; ▪ Plant schedule of proposed planting: botanical name, pot sizes, spacing, staking; ▪ Schedule of existing trees to be retained and removed, with TPZs of all trees to be retained. ▪ All planter boxes/podium planters, roof gardens, walls, fences, furniture, amenity lighting; ▪ Irrigation system details; ▪ An adequate number of sections and elevations to adequately depict the landscape proposal and to clearly indicate changes in levels, terraces, retaining walls and podium planters; and ▪ Overlay basement car park areas with the ground level landscape plan/layout clearly showing landscaping on natural ground and landscaping over podium. ▪ Clearly illustrate and quantify the type, layout and method of construction of landscape materials and elements to be used in the project; and ▪ Include tree/shrub planting methods, tree protection measures, paving construction details,	The final landscape plan has been prepared by a qualified landscape architect who is eligible for membership to the AILA. The landscape plan meets the requirements of the DCP and the Bayside Landscaping Technical Specification. The following drawings have been updated in Appendix H for clarity: ▪ Drawing 01 (6.0 Landscape Analysis Plan will become Existing & Demolition Plan). ▪ Drawing 02 (7.0 Landscape Concept Master Plan will become Landscape Plan).

Council comment	Response
edge treatments, retaining walls, fences, steps, footings, planter boxes on slab (construction and drainage), furniture, and landscape structures and so on.	
The proposal should identify the species of all trees on the landscape plan, including proposed removals and new plantings prior to determination. The tree replacement rate is 3:1, i.e. for each tree removed there should be three new trees planted.	The landscape planting strategy and palette (Section 10 of Appendix H) identifies the species of all proposed trees. The Existing & Demolition Plan (Section 6 of Appendix H) identifies all proposed removals, noting there are no existing trees onsite. To facilitate access to the development CPG will require removal of five street trees. To compensate the removal, CPG are proposing to install up to 15 new small to medium trees as part of the development to achieve maximum practical canopy coverage of the carpark.
The Landscape Plan should incorporate and show the WSUD details as set out in the Integrated Water Management Report.	Section 8 of Appendix H incorporates and shows the WSUD details as set out in the Integrated Water Management Report.
The proposal does not identify any improvements to the Hale Street public domain. The determination should include a requirement for landscaping improvements to be made to the street.	Improvement to the public domain of Hale Street will be provided via revegetation of the nature strip, as indicated in Section 7 of the landscape plan.
It appears that no outdoor space for staff is provided. The Bayside DCP 2022 (6.4: C.6) requires that staff are provided with an outdoor area for recreation, being at least 16m^2 in size, with a minimum dimension of 3 metres. At least 6m^2 of the area should receive direct sunlight for the hours between 10am and 2pm in mid-winter and be shaded in summer. The recreation area should not be in the landscaped setbacks.	Appendix H provides a 16 square metres space (4 m x 4 m) to achieve this requirement in the revised architectural masterplan.
It appears that the car park could be further landscaped. The Bayside DCP 2022 at 3.7.5 requires that at-grade carparks have generous landscaping and tree canopy planting, including: ▪ 1 Tree per 5 car spaces to achieve 50% canopy coverage at maturity to combat urban heat impacts. ▪ The car park should feature areas of landscaping to break up functional areas of the car park including pedestrian crossings and entry areas. Contrasting materials should be used to help define these elements visually. ▪ Tree pits should provide adequate dimensions to cater for tree roots, future tree growth and to provide adequate moisture penetration and aeration of the root zone. ▪ The minimum pot size for trees in the parking area is 100 litres. ▪ Further details are set out in the Bayside Landscaping Technical Specification.	The car park area has been reconfigured to maximise canopy coverage in the car park. There are a minimum of 3 trees (100 L pots) proposed within the car park area (15 car spaces). Appendix H has been updated to address these concerns.

4.3 BCS

BCS flooding comments and subsequent response are detailed in Table 4.5.

Table 4.5 BCS flooding comments response

BCS comment	Response
BCS notes the site is highly constrained by flooding because of the above-ground Sydney Water sewer pipes (SWSOOS - Southern and Western Suburbs Ocean Outfall System) which are located on either side of the site and built up to a level of approximately 4m Australian Height Datum (AHD). These above-ground sewers prevent overland flow and effectively dam this area as drainage can only occur via the authority drainage which has limited capacity to convey stormwater flows under the SWSOOS. BCS notes the site is extremely sensitive to flood drainage during rare events where inundation can last from 18 hours to several days. In accordance with the Understanding and Managing Flood Risk Guideline (FB01) when planning and developing new waste facilities in the context of flood risk management, several considerations should be applied to ensure their resilience and operational effectiveness during flooding events. This guideline recommends that waste facilities should ideally be located outside of flood-prone areas. If this is not possible, they should be situated in areas with limited flood impacts, such as those classified under flood planning constraint categories (FPCC) that indicate lower flood risk. In this case, the site has significant flood impacts.	The proponent understands that the site is highly constrained and is subject to significant flood impact from extreme events.
In the 5% Annual Exceedance Probability (AEP) event the site is flood free, however, is isolated by floodwaters with waters remaining in Hale Street for up to 17 hours.	It is noted that this is the existing condition which is not worsened or further impacted as a result of the proposed development As referred to in Appendix G of Appendix D, CJA have also performed some longer model run times for the 5% AEP event and the analysis demonstrates that the carpark entry (which allows evacuation of the site) is only isolated for up to 10 hours and25 minutes in the and less in the low blockage scenario.
For the 1% AEP event the site is surrounded by floodwaters with Hale Street not safe for vehicles with a flooding duration for the site of approximately 24 hours.	It is noted that this is the existing condition which is not worsened or further impacted as a result of the proposed development As referred to in Appendix G of Appendix D, CJA have performed some longer model run times for the 1% AEP event and the analysis demonstrates that the carpark entry (which allows evacuation of the site) is only isolated for up to 15 hours and 45 minutes, and less in the low blockage scenario.
In the 90-minute Probable Maximum Flood (PMF) storm event, the flood levels exceed 4.24m AHD which inundates the entire site making conditions unsafe at ground level. The flooding duration is estimated at 7-10 days due to trapped water in the low lying arears and the reduced drainage capacity of floodwaters receding from the area. In the PMF event the entire site and precinct is entirely compromised (inundated to depth greater than 100mm) in less than 10 minutes with car and truck entries compromised in 5-6 minutes from the start of the storm. The flood water level in the carpark for the PMF exceeds the proposed design finished floor level (FFL) (2.5m) in approximately 20 minutes from start of the storm indicating that	It is noted that this is the existing condition which is not worsened or further impacted as a result of the proposed development. As referenced in Section 9.3 of Appendix G, the post-development condition will improve the existing condition by providing a raised area on site which is above the PMF and allows the opportunity to shelter in place.

BCS comment	Response
this is when water will begin to enter the building. The water levels reach a peak at 90 minutes.	
The site is subject to H5 hazards in the PMF event. H5 flood hazards indicate hazardous conditions that are unsafe for vehicles and people, increasing the likelihood of structural damage to the facility and the release of hazardous materials into the environment. In the PMF, even under design conditions, almost the entire site will act as floodway with a small portion of flood storage.	It is noted that this is the existing condition and the likelihood of release of hazardous materials will be considerably reduced as a result of the proposed development. It is also noted the building structure will be designed to maintain structural integrity and withstand floods of this magnitude. Flood mitigation measures are also noted in Section 10.4 and 10.5 of Appendix D. The proposed development is also not classified as 'potentially hazardous industry' or 'hazardous storage establishment'.
The current design protects the site up to the 1% AEP (+0.5m freeboard). BCS considers this level of protection does not appropriately address the flood constraints to the site. The FIA states: 'With the site level being close to sea level, it is not surprising that sea level rise has the greatest impact on the flood levels compared to increased rainfall in the climate change scenarios investigated above. It is likely that the planning requirement of 500mm freeboard will be sufficient to offer some protection against climate change impacts to the year 2050, however, the more severe changes to the year 2100 affect the entire precinct and will require alternate approaches to drainage in the area maintain viability of the site and the precinct itself.' When assessing sea level rise for an industrial facility, it is essential to consider a long-term time horizon (i.e. 2090, as presented in the FB01 Guideline). This timeframe allows for the evaluation of potential impacts based on current projections of sea level rise, which are informed by climate change models and scientific research. Specifically, the International Panel on Climate Change (IPCC) projects significant increases in sea levels by 2100, with estimates ranging from 0.5-1.3m depending on greenhouse gas emission scenarios.	In consideration of sea level rise and to consider a long-term horizon, as detailed in Section 10.1 of Appendix D, additional flood modelling has been undertaken for the following scenarios ▪ Year 2050 – 10% rainfall increase and 0.4 m sea level rise. ▪ Year 2100 – 24% rainfall increase and 0.9 m sea level rise. The current flood modelling confirms that the 1% AEP Level + 0.5 m freeboard as per Council's flood advice (RL 2.5 m) is above the 2100 (1% AEP + 10% rainfall + 0.9 m tide) climate change scenario.
The consent authority needs to be satisfied that the risks associated with rising sea levels in low lying areas around foreshore road are appropriately considered for flood risk management of the site. This proactive approach enables the implementation of appropriate design measures, such as elevating structures, enhancing drainage systems, and developing contingency plans to ensure the facility's resilience against future climate impacts. This can help ensure that operations can continue even during extreme flood events or during future sea level rise scenarios. The design should maximise accessibility for staff and emergency responders during floods. This may involve planning for alternative access routes and ensuring that entrances are designed to remain operational during flood conditions. Adequate storage for waste products should be provided, ensuring that waste is kept away from floodwaters to prevent contamination and environmental hazards.	The flood modelling shows that the areas of Foreshore Road required for evacuation as per the FEMP that are within the model boundary are free of flood water for all events up to PMF. Information gleaned from the Mascot, Rosebury and Eastlakes Flood Study (WMA Water, 2015) and the Levels of Foreshore Rd indicate that Foreshore Road, north-west of the catchment site is not inundated. The floor level has been raised to 2.5 m AHD (from 2.0 m AHD) and an elevated structure has been provided for shelter in place and demonstrated that the building is protected for a likely event and duration. CPG believe that all measures have been accommodated on the site to reduce risk and provide resilience for climate change. The suggestion of alternative solutions has been raised with Council and other authorities, with no apparent resolution possible. It is also noted that the waste products are not classified as hazardous and will be retained within

BCS comment	Response
	the building behind closed doors during a flood event.
The proposed facility should have emergency response plans in place that include procedures for evacuation, alternative waste management strategies during floods, and arrangements for staff to access the facility. Given the flashy nature of flooding at the site and the high flood constraints relating to evacuation and warning times, BCS strongly recommends consultation with the NSW State Emergency Service (SES) for advice on all matters relating to the emergency response management of the site.	The development of emergency response plans including the FEMP has been undertaken with SES, Council and other relevant authorities and CPG believe the proposed solution is the best possible outcome for the site. The FEMP was developed with reference to a FEMP from a similar approved SSD application. Broader community evacuation procedures would not be something expected to be addressed by this development.

4.4 DCCEEW – Water

DCCEEW - Water comments and subsequent responses are detailed in Table 4.6.

Table 4.6 DCCEEW - Water comments response

DCCEEW – Water comments	Response
1.0 Site Water Demands **1.1 Recommendation – pre-determination** That the proponent: ▪ Quantifies construction water demands and identifies sources to meet this demand. ▪ Confirms consultation has occurred with the relevant potable water supply authority to demonstrate this is a feasible option. **Explanation** Insufficient information has been provided to understand site water demands. The report provides estimates of take during operation but not during construction. Construction take must be quantified and sources identified. Operational take is noted to be sourced from Potts Hill Authority, but it is unclear if the feasibility of this option has been confirmed.	As referenced in Section 2.4 of Appendix E, the site is serviced by a Sydney Water main that will be utilised for water supply. Using the standard rate of 5 m^3/m^2 for the total construction period water usage, the total water demand for the site for total construction duration is estimated to be 7439 m^2 x 5 m^3 = 37,195 m^3 and the existing 80 mm potable water supply to the site will be used for construction purposes until the new tapings are established. It has been confirmed by Sydney Water (case number 212482) that the site will be serviced by the water and sewer mains in Hale Street.
2.0 Water take and licensing **2.1 Recommendation – pre-determination** That the proponent quantifies the maximum annual volume of water take due to aquifer interference activities and demonstrates the ability to acquire sufficient water entitlement unless an exemption applies. Explanation The proponent notes groundwater is not expected to be impacted. However, based on the information provided it is unclear if this is to be the case. The	**Groundwater Levels** It is noted that groundwater well logs (tests) do not provide standing groundwater levels and show only moisture content (dry, moist, wet, saturated). Table D of Appendix A in the DSI report (Appendix M) provides the depth to groundwater from the ground level, which is consistent with the levels outlined in the RAP. A geotechnical investigation for the proposed development was undertaken by JKGeotechnics on 16 April 2024. During these investigation works, standing water was measured at a depth of 1.5 m in MW1, located in the middle of the site next to one of USTs. During the detailed site investigation on 21 March 2022, standing water was measured at a depth of 1.2 m in MW 1. The construction methodology for removing of USTs will be development by the construction contractor. The methodology may include the use shoring systems to minimise groundwater seepage, scheduling the work during the dry season when

DCCEEW – Water comments	Response
groundwater tests noted water to 2m below ground level with the remediation action plan noting shallow groundwater to 1m below ground level. The EIS notes that excavation would be to a maximum of 3m with the removal of UST tanks. This would suggest the potential for excavation activities to intercept groundwater. There is also potential for GW interception with footing construction, however there is no detail on footing construction methods. Quantification of maximum potential groundwater take is required along with demonstration sufficient entitlement can be obtained unless an exemption applies. **2.2 Recommendation – post determination** The proponent should ensure a water access licence (WAL) is obtained to account for the maximum predicted water take for construction and operation activities unless an exemption applies under the Water Management (General) Regulation 2018 **Explanation** Under the Water Management Act 2000, if groundwater is intercepted a WAL must be obtained prior to any water take occurring unless an exemption under Clause 7 of Schedule 4 of the Water Management (General) Regulation 2018 applies. An exemption may be available if water take is less than or equal to 3M L per water year, subject to the development meeting other exemption requirements, such as: ▪ the water is not taken for consumption or supply; ▪ the person claiming the exemption keeps a record of the water taken under the exemption and provides this to the Minister within 28 days of the end of the water year; and ▪ the records are kept for 5 years.	groundwater levels are lower, and limiting the duration of open excavations. This will help to minimise groundwater extraction and reduce the potential for drawdown of surrounding groundwater resources. The USTs removal and disposal will be undertaken in accordance with Australian Standard AS 4976-2008: *The removal and disposal of underground petroleum storage tanks*. Excavation validation samples will be analysed at a laboratory NATA accredited for the required analyses on an accelerated turnaround time (i.e. 24 hr) to allow for excavations to be backfilled as soon as possible and mitigate the potential risks. The geotechnical investigation report (JKGeotechnics, April 2024) recommends that all footings for the new building consist of piles founded in the underlying natural sands to avoid excavation below the groundwater level. The recommended piling method for footing installation aims to minimise interaction with groundwater on site. The piling methodology will be developed by the construction contractor. Typically, piles are filled with concrete immediately after drilling is completed, and only a minimal amount of groundwater is usually extracted. **Volumetric Licensing – Water Access Licence (WAL)** It is expected that approximately 829,440 litres (L) of groundwater will be extracted during the removal of the two USTs. The worst-case scenario was modelled, assuming that the open excavations will need to remain open for 10 days for each UST removal. Removing a small underground storage tank typically takes one to two days if there are no complications. The geotechnical investigation identified that the alluvial soils below the fill initially consisted of loose to medium-dense fine-grained sand to a depth of approx. 6m. The hydraulic conductivity (k) of $2x10^{-4}$ m/s for fine sand (Botany Sands aquifer) is used for the preliminary assessment of groundwater extraction volume. It is considered that impacts to the groundwater table and local groundwater hydrology will be minor and extraction of groundwater during the construction phase will not exceed 3 megalitres (ML) of groundwater per year. Groundwater will not be pumped or extracted for any purpose other than temporary construction dewatering at the Site identified in the development application. **WAL Exemption** The proposed development falls under two exemptions from WAL: ▪ Less than 3 megalitres (ML) ○ for taking less than or equal to 3ML of groundwater per year in any water source (3ML or less exemption). ○ The 3ML or less exemption applies only to aquifer interference activities not involving taking water for consumption or supply. Examples include: ▪ temporary dewatering for water taken to ensure safe and efficient excavation when constructing buildings, but not to water taken for irrigation or town water supply; and ▪ remediation of groundwater contamination ▪ More than 3ML (Botany Sands) ○ for taking greater than 3ML of groundwater per year for excavation dewatering in the Botany Sands Groundwater Source only (Botany Sands exemption).

DCCEEW – Water comments	Response
	○ The purpose of the Botany Sands exemption is to maintain building and other construction activity where groundwater needs to be taken as a temporary measure while longer-term arrangements are considered for managing temporary infrastructure dewatering. This exemption applies to the Botany Sands Groundwater source only and ends 30 June 2025 or when a controlled allocation of access licences occurs, whichever happens first. This exemption may be reviewed, and the exemption end date may be revised or extended. See Appendix P for a detailed response.
3.0 Groundwater impacts and dewatering requirements **3.1 Recommendation – pre-determination** If the take of groundwater is found to be greater than 3 ML per year, the proponent must assess the impacts due to aquifer interference activities in accordance with the NSW Aquifer Interference Policy and framework (2012). **Explanation** As per Recommendation 1.1 above, the EIS has not provided a volumetric quantification of groundwater take. Additionally, the EIS has not provided an assessment of impacts to groundwater due to construction or operation of the project. NSW DCCEEW Water Group notes that without groundwater take estimations it is difficult to assess the level of risk. Therefore, the proponent should determine the estimated take volume.	See response above and Appendix P.

4.5 DPHI

4.5.1 Traffic

DPHI comments concerning traffic impacts (as contained in a letter dated 13 September 2024 and meeting with the DPHI on 12 December 2024) are addressed in Table 4.7

Table 4.7 DPHI traffic comments response

DPHI comment	Response
Impact on Road Safety The TIA has not assessed the predicted impacts of construction and operational traffic on road safety, as required by the Planning Secretary's Environmental Assessment Requirements (SEARs) and the RTA Guide to Traffic Generating Developments (2002). Recommendation: An assessment of the predicted impacts of construction and operational traffic on road safety in accordance with relevant Transport for NSW guidance. This should include	▪ Section 5.2 of the TIA (Appendix C) has been updated to assess the most recent five year crash data in the vicinity of the site. The recorded crashes reveal there are no clear indication of recurring crash themes, and all crashes are likely attributed to driver error and are not indicative of any underlying road safety issues. ▪ The predicted impacts of construction and operational traffic have been assessed to

DPHI comment	Response
an assessment of the safety and efficiency of access between the site and the adjacent road network and consideration of queuing on Hale Street.	result in a net reduction of the traffic generation potential of the site as assessed in Section 9 of the TIA, and therefore could not expected to have any negative impact on road safety. Accordingly, the assessment is deemed to have satisfied the SEARs and the RTA Guide to Traffic Generating Developments (2002). ▪ Section 9 of the TIA also provides traffic modelling conclusions for the Foreshore Road / Hale Street intersection.
Site Access Performance The RTA Guide to Traffic Generating Developments recommends that driveways with high traffic volumes are not positioned close to intersections. The proposed site access is positioned very close (approximately 15-20 metres) to the Luland Street / Hale Street roundabout. Slowing down and queuing of eastbound vehicles at this roundabout has the potential to impact on the performance of the proposed site access. The performance of this intersection and its impact on the efficiency of the site access has not been considered in the TIA. Recommendation: Further analysis of the site access intersection, including SIDRA modelling, must be undertaken to evaluate the performance of Hale Street at the proposed future site access location.	▪ Updated traffic modelling has been undertaken in Section 9 of the TIA (Appendix C) and demonstrate the proposed site access driveways will operate satisfactorily. ▪ The proposed position of the driveway has been satisfactorily designed in accordance with AS 2890.1 (2004) and AS 2890.2 (2018) and will operate safely and efficiently. ▪ The driveway has been strategically positioned to satisfy site operational requirements and is located as far practicable from Foreshore Road being the critical classified road. ▪ Vehicles must reduce their speed to an appropriate and safe level when making a turn to maintain control and ensure the safety of all road users, especially in the context of large heavy vehicles. In this regard, vehicles slowing down on approach to the roundabout is favourable in the circumstance.
Operational Traffic Management While B-doubles are limited to accessing the site from Foreshore Road based on NHVR B-double approved routes, there does not appear to be any restriction for smaller trucks accessing the site from Botany Road and then traveling west along Hale Street to the site access. It is not clear how smaller trucks will be prevented from turning right from Hale Street into the access driveway. This movement has the potential to obstruct through traffic travelling West on Hale Street. Section 6.12 Queuing of the TIA states that on-site staff will be trained to re-direct trucks should vehicle queues extend near the site access on Hale Street. Insufficient information has been provided to demonstrate the movements of re-directed trucks on-site. Recommendation: Additional details of how operational traffic will be managed to prevent righthand turns from Hale Street and how on-site truck movements will be managed in the event of vehicle queues near the site access, is required.	▪ A future operational environmental management plan (OEMP) will be implemented requiring all heavy vehicles to arrive/depart via General Holmes Drive (M1). The OEMP will specifically note that no heavy vehicles are to access the site from the east via Hale Street (east of Luland Street) or Luland Street. ▪ A “NO RIGHT TURN” sign will be installed opposite the commercial vehicle driveway facing westbound traffic on Hale Street. ▪ A “NO LEFT TURN” sign will be installed within the site on the exit side of the commercial vehicle driveway. ▪ Detailed queuing analysis has been undertaken in Section 9.8 of the TIA and confirm it is statistically improbable for trucks to queue on the public road under extremely conservative operational assumptions, and sufficient space will be made available on site prior to any truck arrivals at all times. Therefore, the former assessment stating that traffic will be re-routed is no longer relevant, nor required.
Future Traffic Growth SIDRA modelling has not been carried out for a future traffic scenario accounting for background traffic growth on the surrounding road network. Recommendation: SIDRA modelling must be carried out for a future traffic scenario with a 10-	▪ SIDRA modelling has been updated to include a 10-year horizon in accordance with DPHI request, including additional assessment of the Hale Street / Luland Street intersection (refer to Section 9 of the TIA).

DPHI comment	Response
year horizon that predicts the performance of key intersections, including the intersections of Foreshore Road / Hale Street, Hale Street / site access and Hale Street / Luland Street. The impact of queue lengths and delays on the safety and efficiency of the future road network must be assessed. Details of any required mitigation measures, such as road widening, must be provided.	
Swept Path Analysis The swept path analysis for the site access driveway provided at Appendix D of the TIA is unclear and indicates there may be conflict between two B-doubles travelling eastbound and westbound on Hale Street. Recommendation: Revised swept path analyses are required for 20 metre articulated vehicles and B-doubles accessing the site that clearly demonstrates the centreline of Hale Street will not be crossed and there will be no conflict with on-street parking. All line marking on Hale Street must be clearly marked.	▪ Swept path analysis have been updated with recent Nearmap aerial georeferenced in the background and clearly demonstrate 26m B-double vehicles will be able to ingress and egress the site satisfactorily in accordance with AS 2890.2 (2018).
Daily Heavy Vehicle (HV) Movements Section 6.10: Truck Frequencies of the TIA outlines the anticipated truck volumes for the development. It is not clear how these vehicle numbers have been determined. Bayside Council has also raised several queries regarding the traffic generation analysis. Recommendation: Additional information is required to justify the predicted truck volumes, including the breakdown of vehicle types.	▪ Section 9 of the TIA has been updated to provide detailed calculations on how the anticipated heavy vehicle trip generation associated with the project has been estimated including a breakdown of the vehicle types.
Peak Period Vehicle Movements Section 8.4.1: Critical Intersection of the TIA states that the proposed development is expected to generate 35 vehicle trips per hour during both the morning and afternoon peaks. This is inconsistent with the statement made in Section 8.2.3: Combined Generation of the TIA, which states that the development is predicted to generate 41 vehicle trips per hour. Recommendation: The TIA must be revised to ensure traffic volumes used are consistent throughout the report. All updated SIDRA modelling must be based on the correct traffic volumes.	▪ The TIA has been updated to ensure traffic volumes used are consistent throughout the report, with revised SIDRA modelling based on the correct traffic volumes.
Street Parking Section 9.1.3 Loss of On-Street Parking notes the development will result in a loss of five on-street parking spaces on the northern side of Hale Street. The impact of this has not been assessed and no mitigation measures or offsets have been proposed. Recommendation: The TIA must be revised to assess the impact of the loss of five on-street parking spaces and confirm how this reduction in parking will be mitigated or offset. Evidence of in principle support from the local traffic committee for the removal of the on-street parking spaces should be provided.	▪ As reference in Section 8.6 of the updated TIA (Appendix C), the local traffic committee does not have a concurrence role for any increase or decrease of on-street car parking, but must be consulted on changes to the on-street parking restrictions, which is not relevant in the context of the project.
Construction Traffic The SEARs require impacts of all key stages of construction and operation of the development to	▪ Construction traffic impacts have been assessed based on estimated actual

DPHI comment	Response
be assessed. This is a standard requirement for all SSDs. A construction traffic impact assessment cannot be carried out post-determination, as proposed in the Preliminary Construction Traffic & Pedestrian Management Plan (CTPMP) prepared by TRAFFIX, dated 15 July 2024. Recommendation: A construction traffic impact assessment must be provided, particularly given existing traffic issues in the area.	construction traffic volumes provided by CPG in consultation with a construction company. ▪ The TIA has been updated to also include an assessment of expected construction impacts, consistent with the assessment methodology that were deemed satisfactory by DPHI for SSD-48411467.

4.5.2 Noise and vibration

The EPA has raised several concerns regarding the Noise and Vibration Impact Assessment (NVIA) prepared by E-Lab Consulting, dated 16 April 2024. The Department is concerned the NVIA does not provide a representative assessment of potential noise impacts associated with the Development.

Recommendations: A revised NVIA is required addressing all matters raised by the EPA.

The response to EPA comments is summarised in Section 4.6.1.

4.5.3 Integrated water management strategy

DPHI comments on water management and subsequent response are detailed in Table 4.8.

Table 4.8: DPHI integrated water management strategy comments response

DPHI Comment	Response
The Integrated Water Management Strategy (IWMS) prepared by CJ Arms, dated 3 April 2024, provides a conceptual description of the proposed water, sewer and stormwater infrastructure for the development. Where water and drainage infrastructure works are required that would be handed over to the local council, full hydraulic details and detailed plans and specification of the proposed works must be provided for assessment. Bayside Council has advised the information presented in the EIS and IWMS is insufficient for assessment purposes. **Civil Engineering Report** The level of detail provided regarding the proposed earthworks and stormwater drainage design is insufficient to enable an assessment of these works. Recommendations: A civil engineering report is required that provides design drawings for the proposed stormwater drainage system and bulk earthworks, including the proposed flood storage tank design and finished levels plan(s).	Concept design drawings have been revised in Appendix B and E of Appendix F.
Extension to Council's Stormwater System The IWMS states a new stormwater discharge point and inlet pit will be installed at the front of the site on Hale Street, with a proposed 22 metre extension to Council's stormwater drainage system on Hale Street. Insufficient design details have been provided regarding this extension and the environmental impacts of these works have not been assessed. Recommendation: Additional information is provided regarding the design of the proposed stormwater discharge point and extension, including consideration of any associated environmental impacts.	Additional design information regarding the proposed stormwater design, discharge point and extension is provided in Appendix B.

4.5.4 Air quality

The Air Quality Impact Assessment (AQIA) prepared by Northstar, dated 13 May 2024, incorrectly states an Environment Protection Licence (EPL) is not required for the development (section 3.1). Section 4.1.2 also incorrectly states the proposal site is located in a rural area.

Recommendations: The AQIA should be corrected to state an EPL will be required as the activity is a scheduled activity under the Protection of the Environment Operations Act 1997 and is in an urban area.

The AQIA has addressed the corrections and has been updated by Northstar (attached as Appendix L).

4.5.5 Landscaping

DPHI comments on landscape design and subsequent response is in Table 4.9.

Table 4.9 DPHI landscape concept design comment response

DPHI comment	Response
Inconsistencies The Landscape Concept Design prepared by CJ Arms dated 19 April 2024 includes inconsistencies with respect to the number of semi-mature Casuarina glauca (She Oaks) to be removed, in some places it says four trees will be removed, and in others it indicates five trees will be removed. Recommendations: The Landscape Concept Design must be revised to confirm the total number of trees to be removed as a result of the development.	The inconsistencies have been rectified in Appendix H. Five trees will be removed as indicated in the revised landscape plan.

4.5.6 Social impact assessment

Public submissions have raised significant concerns regarding the potential health and amenity impacts associated with the development.

Recommendation: The Social Impact Assessment prepared by Astrolabe Group, dated 16 March 2024, should be reviewed and updated as necessary to address the key issues raised in public submissions.

The social impact assessment been updated in Appendix K and has addressed public submissions.

4.5.7 Fire safety assessment

The Fire Safety Assessment prepared by GHD dated 22 March 2024 states there are several deviations from the NSW Fire and Rescue (FRNSW) Fire Safety Guideline – Fire Safety in Waste Facilities (2020). While the Department notes FRNSW has not objected to these, FRNSW has requested a Fire Safety Study be prepared should the development be approved to confirm the suitability of the fire safety strategy.

Recommendation: Note that any performance based solution proposed as part of the fire safety strategy for the site will be considered by FRNSW as part of the FSS process, including the Initial Fire Safety Report (IFSR) and / or Performance-Based Design Brief / Fire Engineering Brief Questionnaire (FEBQ).

The above recommendation is noted and a Fire Safety Study (FSS) will be prepared should the development be approved to confirm the suitability of the fire safety strategy.

4.6 EPA

4.6.1 Noise and vibration

NSW EPA comments concerning the proposal are addressed in Table 4.10.

Table 4.10 NSW EPA comments and response

Comment	Response
Identification of sensitive receivers	
The assessment has categorized nearby residential areas into two groups: RC1 and RC2. As shown in Figure 1 and Table 2 of the NVIA, RC1 is a residential area located within the industrial zone, approximately 80 meters from the proposed development. While the specific addresses of the residential dwellings within RC1 have not been provided, ambient noise monitoring has been conducted at a location identified as LT1 - 3 Hale Street Botany, at the corner of Luland Street. Based on the information presented in Figure 1, it appears that LT1 and RC1 are likely located at 3 Luland Street Botany, rather than 3 Hale Street Botany. Further clarification regarding the exact locations of RC1 and LT1 is necessary.	Table 3 and Figure 3 have been updated in Section 3.1 the NIA (Appendix J) to clarify the location of residential receivers RC1 (3 Luland Street, Botany). The residences along Bay Street and Erith Street have also been separated into two receiver catchments (RC2 and RC6).
The assessment currently does not include or consider the potential noise impacts on residential properties located on Erith Street, approximately 100 meters from the proposed development. It is essential to evaluate the noise exposure of residences on the northern side of Erith Street within the NVIA.	The Erith Street residences approximately 100 m from the proposed development were previously assessed as RC2 (specifically 26 Erith Street, the western-most residence closest to the proposed development). An updated site map and receiver catchment description is provided in Table 3 and Figure 3 in Section 3.1 of the NIA to reflect this.
A comprehensive land use survey should be conducted to accurately determine the location of sensitive receptors, such as residential properties, schools, and hospitals, in relation to the proposed development. This information will be crucial for assessing potential noise impacts and implementing appropriate mitigation measures.	The NSW Government Sharing and Enabling Environmental Data (SEED) land zoning maps are referenced in Figure 2 to determine the land zoning of nearby development, and to determine the most affected receivers surrounding the proposed development. The corresponding assessments in Section 7 and 8 of Appendix J have been updated to incorporate specific land zoning where applicable.
Ambient background noise monitoring	
Noise Monitoring Equipment: The NVIA indicates that long-term ambient background noise monitoring was conducted at three locations: LT1, LT2, and LT3. The monitoring equipment used was a Convergence Instruments Sound Level Meter Data Logger (NSRT_mk3 Type 1). However, the Noise Policy for Industry (NPfI) stipulates that background noise levels should be measured using a noise data logger that meets the accuracy specifications of a Class 2 meter, as defined in AS IEC 61672.1. The Convergence instrument, equipped with a MEMS microphone, is unable to be certified against this standard and therefore does not comply with the NPfI requirements.	The Noise Policy for Industry (NPfI) requires rating background levels (RBL) be measured with a noise data logger that has an accuracy at least equivalent to the specifications of a Class 2 meter as defined in AS IEC 61672.1. AS IEC 61672 superseded the AS IEC 60651 standard. In circumstances where a sound level meter cannot be calibrated to IEC 61672, NATA currently permits calibration to the superseded standard, IEC 60651, providing the laboratory is accredited to the standard. Background noise levels in this assessment have been obtained from additional monitoring conducted in October-November 2024 using the following: ▪ 1 x Acoustic Research Labs Ngara Real Time

Comment	Response
	Sound Acquisition System (S/N: 8780C7). ▪ 2 x Convergence Instruments Sound Level Meter Data Logger (NSRT_mk3 Type 1). The NSRT_mk3 monitors above have been calibrated by Calibre Technology, who are accredited to provide calibrations to IEC 60651 and the conformance statement in the certificate is in accordance with NATA requirements. Calibration certificates are provided in Appendix C of Appendix J. Considering the above, the monitors are considered to meet the accuracy specifications equivalent to the definitions in AS IEC 61672.1. Refer to Section 4.1 of the NIA (Appendix J).
Monitoring Instrument Placement: The NVIA does not provide specific details regarding the placement of the background noise monitoring instruments, such as their height above ground and proximity to reflective surfaces. The NPfI outlines the necessary requirements for the location of monitoring equipment used to assess background noise levels. Page 3 It is essential to provide comprehensive information about the micro location of the monitoring instruments, along with an evaluation demonstrating compliance with the NPfI's locational guidelines.	Background noise levels in the NIA have been obtained from additional monitoring conducted in October-November 2024. The location of noise monitors are as follows: ▪ Approximate locations in the site map in Figure 3. ▪ Detailed descriptions provided in Table 6. ▪ Photographs of noise monitor locations in Appendix A of the NIA.
Monitoring Location Requirements: The NVIA indicates that the same monitoring locations, LT1, LT2, and LT3, were used to assess both background noise levels and existing traffic noise levels. However, the locational requirements for measuring background noise and traffic noise differ. The NPfI mandates a free-field location, while the Road Noise Policy (RNP) requires a reverberant location within 1 meter of the exposed façade. As highlighted earlier, it is crucial to provide a detailed description of the monitoring instruments' micro locations and justify their compliance with the specific requirements of both the NPfI and RNP. Depending on the actual placement, adjustments to the measured noise levels may be necessary. Furthermore, it is unlikely that the noise levels measured at LT1 or LT2 accurately represent the noise exposure experienced by residents on Erith Street Botany.	Background noise levels in this assessment have been obtained from additional monitoring conducted in October-November 2024. Refer to Section 3.1 and 8.4 of the NIA (Appendix J). Detailed descriptions and photographs have been provided in the sections noted above. The following is noted: ▪ For the purpose of the NIA, noise monitoring has been used to determine background noise levels (L_{90}) and equivalent continuous noise levels (L_{eq}). ▪ In the assessment of traffic noise generation, it is noted: - Heavy vehicles entering and departing the site will not create any significant noise impacts to surrounding residences due to the direction of travel. - Light vehicles entering and departing the site have been conservatively assumed to be four movements in a peak hour. The increase in noise from additional traffic generated by the development will satisfy the Road Noise Policy requirements identified in Section 6.2 of the NIA (in isolation of existing traffic noise levels).
Project noise trigger levels (premises-based noise emissions)	
The NPfI stipulates that project noise trigger levels (PNTLs) must be established based on the more stringent of either the project intrusiveness level or the project amenity level, adjusted to an LAeq,15min, dBA descriptor. Given the uncertainties highlighted earlier regarding the acquired background noise levels, the EPA does	Background noise levels in this assessment have been obtained from additional monitoring conducted in October-November 2024. Refer to Section 3.1, 4.1 and 4.3 of the NIA (Appendix J). This has been undertaken to address the uncertainties highlighted, including: ▪ Additional monitoring undertaken directly opposite Erith Street residences.

Comment	Response
not support the established project intrusiveness level.	▪ Additional monitoring undertaken using equipment that has been calibrated by a NATA certified laboratory to meet the accuracy specifications of AS IEC 61672 (or a NATA approved equivalent).
The NVIA has presented project amenity noise levels by setting them 10 dB below existing industrial noise levels. While the NPfI permits this approach, the NVIA appears to have assumed that measured traffic noise levels are equivalent to existing industrial noise levels without providing any explanation or justification. This approach is not appropriate and does not conform to the NPfI guidelines. Consequently, the EPA does not support the presented project amenity noise levels for RC1 and RC2. These discrepancies will likely impact the established PNTLs and the overall compliance of the proposed development.	Additional noise monitoring has been undertaken as detailed in Section 4.3 of Appendix J, using an Acoustic Research Labs Ngara Real Time Sound Acquisition System. Based on the review of the recorded WAV audio files, the dominant source during all periods of the day is industrial noise within the area at noise monitoring location LT1.
In addition to the points discussed above, NVIA asserts that RC1, a residential flat building located at 3 Luland Street Botany, should be assigned higher PNTLs than those established in the assessment. This recommendation is based on two factors: ▪ Location within an Industrial Zone: The residential flat building is situated within an industrial zone. ▪ Aircraft Noise Exposure: The building is located in a 30-35 ANEF zone, indicating exposure to aircraft noise. It has been designed to ensure that internal noise levels comply with the aircraft noise requirements specified in AS2012:2015. The residential flat building at 3 Luland Street Botany appears to be of modern construction, rather than a legacy structure. Considering that a recent planning decision has permitted a sensitive land use within the industrial zone, the relevant planning authorities should determine an appropriate noise assessment goal for this receiver. This goal should strike a balance between the objectives of the industrial zone and the reasonable level of amenity expected for an approved sensitive land use.	The NPfI states the following with regard to establishing project noise trigger levels and general assessments: ▪ Section 2.3: Intrusiveness noise levels are not used directly as regulatory limits. They are used in combination with the amenity noise level to assess the potential impact of noise, assess reasonable and feasible mitigation options and subsequently determine achievable noise requirements. ▪ Section 2.4: For isolated residences within an industrial zone the industrial amenity level of 70 dB(A) would usually apply. RC1 is located on land zoned as IN1 – General Industrial. ▪ Section 2.7: The industrial interface assessment provisions recognise that a marginally reduced acoustic amenity is acceptable for existing residences co-located with existing industry, and that the availability of noise mitigation measures might be limited in these circumstances. In consideration of the above, the project noise trigger level has been corrected and based on measured existing industrial noise affecting the residence, as opposed to adopting the industrial amenity level as allowed in Section 2.4 of the policy. The resultant project amenity level is 16 dB more stringent at night when compared to the industrial amenity level applied to isolated residences in an industrial zone. On this basis, a balance between the objectives of the industrial zone and the reasonable level of amenity expected for an approved sensitive land use within an industrially zoned area is achieved. This is addressed in Section 6.1 of the NIA (Appendix J).
Operational Noise Mitigation	
The NVIA has not explicitly identified the proposed construction details of the warehouse that were considered in the noise modelling. Furthermore, the assessment has not provided specific	The assessment in Section 8 and corresponding mitigation measures in Section 10.2 of Appendix J have been updated to include controls regarding the construction of the proposed

Comment	Response
recommendations regarding the warehouse's construction to ensure compliance with the established acoustic goals. It is essential to include detailed information about the warehouse construction requirements necessary to meet the confirmed PNTLs within the NVIA.	development to ensure compliance with the established acoustic goals.

4.7 Heritage NSW

4.7.1 Aboriginal heritage

The Aboriginal Cultural Heritage Assessment Report (ACHAR) has been prepared with reference to the relevant guidelines as required by the Secretary's Environmental Assessment Requirements. Based on the outcomes of the ACHAR a Potential Archaeological Deposit (PAD) has been identified across the entirety of the Subject Area, consisting of buried natural sands as identified by geotechnical investigations. As '2-4 Hale Street PAD 01' has unknown significance and has the potential to be partially directly impacted by the construction of the facility, particularly during the proposed underground storage tank remediation works, the ACHAR states that further archaeological investigation is required. Due to the presence of the extant structures and hardstand, however, it is not possible to undertake archaeological excavation at this stage, and it is therefore recommended that such investigations be undertaken under an Aboriginal cultural heritage management plan. Heritage NSW provisionally supports the proposed Mitigation Measures and Recommendations (Sections 7 & 8 of the ACHAR), however, the following updates and/or clarifications as outlined below are required.

- **Please confirm that '2-4 Hale Street PAD 01' has been registered on the Aboriginal Heritage Information Management System based on the results of this assessment.**
- **To evaluate whether the proposed investigation program is adequate to mitigate the predicted impacts of the project, Heritage NSW require that the detailed Archaeological Research Design and Excavation Methodology (with detailed plans showing proposed excavation locations) be provided as a component of the ACHAR. As a minimum, this would need to include the methodology for test excavations, specification of the triggers for when test excavations would be undertaken, proposed triggers for where salvage excavation would be required, and a proposed approach should subsurface deposits be of a level of significance that necessitates a conservation outcome. This methodology must be developed in consultation with Registered Aboriginal Parties.**

A test excavation methodology has been prepared by Artefact in Appendix I, with triggers for the test excavation and salvage excavation detailed in Section 3.4 and 3.11 respectively.

It is confirmed that the 2-4 Hale Street PAD 01 has been registered as AHIMS ID 45-6-4111 on the AHIMS website.

The methodology was issued to the registered Aboriginal Parties (RAPs) for comment on 24 December 2024. An extended comment period was accommodated due to the Christmas break, with comments required prior to 28 January 2025. Three responses were received from the Didgengunawa Clan, Amanda Hickey Cultural Services and A1 Indigenous Services. All of which were in agreement and supportive of the proposed methodology. The test excavation methodology has included a summary of this consultation in Section 3.0 of Appendix I.

4.8 NSW Ports

NSW Ports have become aware of the proposed Waste management facility in Botany (SSD-62855708). Due to its proximity to the NSW Ports land, we have a vested interested in this application.

We understand that the exhibition period has ended, and we apologise for the delayed submission on this project. We seek that the Department considers our submission.

We are concerned that the proposal will result in adverse traffic impacts, in particular on Foreshore Road. We agree and support issues raised by Bayside Council (in their submission dated 09.09.2024) pertaining to traffic, parking and access concerns. The proposed traffic movements will impact on the freight routes of NSW Port. Port Botany Freight Study (dated 22.09.2017) notes that Foreshore Road (north of Hale) has an average weekday traffic of 46,088 vehicles. Majority of traffic on Foreshore Road are large Heavy Commercial Vehicles used to transport freight. Any additional heavy vehicles turning onto Foreshore Road are likely to affect traffic and movement onto Foreshore Road by increasing traffic queuing. Additionally, queuing could delay/hinder efficient freight movement. We seek that the Department requests further design amendments which will address how trucks from the site can be accommodated without an adverse impact on existing site conditions.

NSW Ports welcome the opportunity to further assist in informing the Department on this application. If you require any further information, please do not hesitate to reach out.

We also request an update on the application and whether the Department has sought any amendments to the design.

Traffic concerns relevant to this advice have been addressed within the response to Council in Section 4.2.1.

SIDRA analysis of the Hale Street and Foreshore Road intersection has been undertaken and is detailed in Section 9.5.5 of the TIA. A worst-case scenario of 13 heavy vehicles arriving on Hale Street from Foreshore Road and 13 heavy vehicles departing onto Foreshore Road during the peak hours has been considered. The intersection is expected to operate satisfactorily under all assessment scenarios at satisfactory LoS C or better, which is the same with and without the proposed development. No external infrastructure improvements are required at the Hale Street and Foreshore Road intersection from a transport planning perspective to accommodate the proposed development.

4.9 SES

Thank you for the opportunity to provide comment on the Flood Impact Assessment and Flood Emergency Management Plan (FEMP) for the proposed development at 2-4 Hale Street, Botany.

The NSW State Emergency Service (NSW SES) is the agency responsible for dealing with floods, storms and tsunami in NSW. This role includes, planning for, responding to and coordinating the initial recovery from floods. As such, the NSW SES has an interest in the public safety aspects of the development of flood prone land, particularly the potential for changes to land use to either exacerbate existing flood risk or create new flood risk for communities in NSW.

It is the preference of NSW SES that all development follows the application of sound land use planning and flood risk management in accordance with the Flood Prone Land Policy, the Flood Risk Management Manual 2023 (the Manual) and supporting guidelines.

The NSW SES has reviewed the proposed FEMP and the flood risk information (e.g. Bayside Flood Emergency Sub Plan 2023, Botany Bay and Foreshore Beach Floodplain Risk Management Study and Plan 2020 etc.) available to the NSW SES, noting the proposed development is at risk of flooding in a 20% Annual Exceedance Probability (AEP) event with adjacent roads becoming inundated by floodwaters[1]. The NSW SES also does not have statutory authority to endorse or approve flood emergency response plans, however, provides the following advice based on the principles outlined in the Guidelines as detailed in Attachment A.

We refer to our previous advice dated 18 April 2024 and meeting on 28 March 2024 and provide the following additional advice.

In summary, we:

- **Understand that the proposal significantly reduces the number of people onsite from the existing development, and provides an additional upper floor office space2.**
- **Reiterate that shelter in place is not an endorsed strategy by the NSW SES for future development.**
- **Reiterate that the NSW SES is opposed to the imposition of development consent conditions requiring private flood evacuation plans rather than the application of sound land use planning and flood risk management.**
- **Reiterate NSW SES is opposed to any strategy which transfers residual risk, in terms of emergency response activities, to NSW SES.**
- **Recommend references to "the 1% AEP Event3 " and other modelled storm events are removed from the emergency management plan and replaced with clear and actionable triggers which align with warnings issued by the Bureau of Meteorology and NSW SES, rather than AEP events. Warnings will not list the expected AEP extent as this is not known until after the peak of the flood event. Further, as the site is affected by flash flooding it is not subject to flood warnings, which complicates any emergency management strategy for the site. As such, Severe Weather Warnings and Thunderstorm Warnings will be the most likely form of advice about the potential for flood producing storms and rainfall.**
- **Recommend removing reliance on modelled rates of rise4 to determine when to initiate emergency response, as each flood event may behave differently in response to antecedent conditions.**
- **Recommend that the flood emergency plan is regularly exercised, similar to building fire evacuation drills. The NSW SES also recommends updating the FEMP at regular intervals and whenever additional flood information is available or highlighted during the drills or flood events.**
- **Recommend pursuing, if relevant, site design and stormwater management that reduces the impact of flooding and minimises any risk to the community. Any improvements that can be made to reduce flood risk will benefit the community.**
- **Recommend considering the impact of climate change on the flood risk.**

SES comments concerning the project and subsequent response is in Table 4.11.

Table 4.11 SES Comments and response

SES comments	Response
SES understand that the proposal significantly reduces the number of people onsite from the existing development and provides an additional upper floor office space.	Noted and agreed.
SES reiterate that shelter in place is not an endorsed strategy by the NSW SES for future development.	The primary response to flooding is evacuation from the site based on BOM warnings. Shelter in place is a last resort for a number of events. It is noted that shelter in place is not an endorsed strategy, however, this is the only practical option

SES comments	Response
	given the nature of existing flood conditions and resultant constraints and has been an acceptable strategy on other SSDs. CJA further note that the SES has not opposed the strategy.
SES reiterate that it is opposed to the imposition of development consent conditions requiring private flood evacuation plans rather than the application of sound land use planning and flood risk management.	Noted.
SES reiterate it is opposed to any strategy which transfers residual risk, in terms of emergency response activities, to SES.	When considering the site's current conditions, the proposed development is a significant improvement in terms of reliance on emergency response activities undertaken by the SES, given the ability to shelter-in-place in a location well above the PMF.
SES recommend references to “the 1% AEP Event” and other modelled storm events are removed from the emergency management plan and replaced with clear and actionable triggers which align with warnings issued by the Bureau of Meteorology and NSW SES, rather than AEP events. Warnings will not list the expected AEP extent as this is not known until after the peak of the flood event. Further, as the site is affected by flash flooding it is not subject to flood warnings, which complicates any emergency management strategy for the site. As such, Severe Weather Warnings and Thunderstorm Warnings will be the most likely form of advice about the potential for flood producing storms and rainfall.	Noted and agreed. The FEMP provided was intended for review so that the nature of flooding is fully understood. A simpler emergency response plan for the development will be developed post approval during detailed design. In that document references to individual storm events will be removed. Further, severe weather warnings and thunderstorm warnings will be used as triggers for site evacuation.
SES recommend removing reliance on modelled rates of rise to determine when to initiate emergency response, as each flood event may behave differently in response to antecedent conditions.	Noted and agreed. BOM warnings will be used as a primary trigger for evacuation of the site. The FEMP provided was intended for review so that the nature of flooding is understood. A simpler emergency plan for the development will be developed post approval during detailed design. In that document references to storm events and rates of rise will be removed.
SES recommend that the flood emergency plan is regularly exercised, similar to building fire evacuation drills. The NSW SES also recommends updating the FEMP at regular intervals and whenever additional flood information is available or highlighted during the drills or flood events.	Noted – additional text regarding regular flood drills will be added and included in FEMP and simplified document. Additionally, text regarding regular review and update of the FEMP has been included.
SES recommend pursuing, if relevant, site design and stormwater management that reduces the impact of flooding and minimises any risk to the community. Any improvements that can be made to reduce flood risk will benefit the community.	Noted. Whilst all reasonable measures to reduce the impact and risk to the development and impact on the community have been taken, the nature, severity and extent of flooding in this part of Bayside LGA is not something that can be addressed solely by this development.
SES recommend considering the impact of climate change on the flood risk.	Section 10.1 of the flood impact assessment (Appendix D) includes further modelling relating to climate change.

4.10 Sydney Water

Sydney Water has reviewed the application based on the information supplied and provide the following comments to assist in understanding the servicing needs of the proposed development.

Water and Wastewater Servicing

- **Our preliminary assessment indicates that water and wastewater servicing should be available for the proposed development.**
- **Amplifications, adjustments, deviations and/or minor extensions may be required.**
- **Detailed requirements will be provided at the S73 application stage.**

Critical Asset Stormwater

- **Our system indicates that a 3730x1220 stormwater channel is adjacent to the proposed site on the northern boundary. Sydney Water requires the following:**

Building over or adjacent to stormwater assets

- **The clearance requirements for the proposed development is to comply with current Specialist Engineering Assessment Procedure.**
- **Further details regarding this Specialist Engineering Assessment Procedure could be obtained from the nominated Water Servicing Coordinator.**

Stormwater connections to Sydney Water's Stormwater Channel

- **Sydney Water has noted that there are no direct stormwater connection from the development site to Sydney Water's stormwater channel.**
- **The proponent needs to ensure to removal/seal all existing stormwater connections which are connected to Sydney Water's stormwater channel.**

Next steps

- **Should the Department decide to progress with the subject development application, Sydney Water would require the following conditions be included in the development consent.**

  - **Section 73 Compliance Certificate**
  - **Building Plan Approval**

Further details of the conditions can be found in Attachment 1.

DPHI is advised to forward the enclosed Sydney Water Development Application Information Sheet (for proponent) to assist the proponent in progressing their development. This Info Sheet contains details on how to make further applications to Sydney Water and provides more information on Infrastructure Contributions.

This advice is not formal approval of our servicing requirements. Detailed requirements, including any potential extensions or amplifications, will be provided once the development is referred to Sydney Water for a Section 73 application. More information about the Section 73 application process is available on our web page in the Land Development Manual.

In the updated infrastructure assessment report by CJA (Appendix E) the comments by Sydney Water are acknowledged and it is confirmed there are no issues with regards to the comments.

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CHAPTER 5

RESPONSE TO PUBLIC SUBMISSIONS

5 RESPONSE TO PUBLIC SUBMISSIONS

The public submissions are addressed in this chapter. **Bold** text is an exact reproduction of the submissions received, while normal text is the response to submissions. A public submissions table is provided in Appendix A.

5.1 Submission 1 (SE-74771212)

A public submission was received by DPHI from Noel Giuffre.

Vehicle movements is noted at 34 large/heavy truck per hour. The trucks are required to enter & exit the proposed driveway in a forward direction (EIS section 2.6). When following the Truck Routes listed in EIS 6.4.3.3, every truck will be required to enter the roundabout at the corner of Hale and Luland Street Botany to perform a 360 degree turn, then enter the property across oncoming traffic. The roundabout is not large enough to support a B-Double truck to perform a 360 degree turn and is only barely large enough to support semi-trailers. Currently many semi-trailers attempting a 360 degree turn at the roundabout end up reversing a number of times (holding up traffic, causing traffic congestion, unsafe manoeuvres and near accidents) and as a result some damage the drain, kerb and gutter which has been repaired numerous times.

CPG can confirm that B-doubles will not use the roundabout on Hale Street to exit or enter the site. B-doubles will use the approved 26 m B-double routes only as detailed in Section 6.4.3.3 in the EIS. Entry and exit to the site will be via General Holmes Drive and Foreshore Road.

The additional traffic from the proposed Truck Movements (EIS 6.4.3.1) is also an issue, as at current peak traffic times, there is already congestion. A real-world test should be conducted with a representation of proposed truck sizes performing 34 movements an hour undertaking the 360 degree roundabout manoeuvre at peak traffic times to determine the results.

As stated above, 360-degree roundabout manoeuvres will not occur. SIDRA intersection analysis has been undertaken utilising traffic surveys and predicted truck numbers, in addition to a cumulative impact assessment detailed in Section 9 of the TIA.

Traffic generation arising from the project has been assessed having regard for the proposed site operations and results in a net traffic generation reduction during both the morning and afternoon peak periods. Notwithstanding, conservative SIDRA modelling has been undertaken for existing and future year (10 year horizon) scenarios demonstrating all key intersections will operate satisfactorily at LoS C or better with spare capacity. As such, no external infrastructure improvements (intersection upgrades etc) are required from a transport planning perspective to accommodate the proposed development.

It is also noted that the TIA has been reviewed by TfNSW with no comment received.

The findings of the Sensitive Receptors section (6.3.2.1) regarding Air Quality and Odour remains an unacceptable risk to the health of the many residents, school children and workers located in very close proximity to the site. All waste transfer stations, no matter how modern, generate odours, airborne pollutant particles and visual rubbish from the process of truck transportation and transfers. The current air quality and pollution dust in the area is already relatively poor from aircraft and truck fuel, evident by the black dust that covers surfaces after a short period of time. A waste transfer station that will process much toxic and banned waste and the increase in truck emissions in very close proximity to a large population, substantially increases the health risk of the local community.

Section 6.3.2.1 of the EIS details sensitive receptors identified in the AQIA in line with the Approved Methods (NSW EPA, 2022a) guidelines.

As detailed in section 6.9.4.1 of the EIS, the Waste Classification Guidelines (2014) describe non-putrescible materials as those that "typically do not: readily decay under standard conditions, emit offensive odours, attract vermin or other vectors (such as flies, birds and rodents)". As the site will only handle non-putrescible waste, offensive odours are not expected.

The proposed development will have management procedures in place to ensure vegetation waste will not compost on site and the project site will not accept putrescible waste or kerbside green waste from Council collections.

Section 3.4.7.1 of the EIS describes the incoming waste procedure and details prohibited waste types, including asbestos, food waste, putrescible waste, liquid waste and other hazardous waste. Section 6.2.3 of the EIS includes the management strategies to demonstrate how the facility will comply with EPA standards for managing construction waste in NSW (2018).

An AQIA was undertaken and submitted with the EIS which concludes that the construction and operational phases of the project will not result in any exceedances of the relevant air quality criteria at the surrounding receivers. It is considered that the implementation of the construction and operational phase mitigation methods and good site management practices will be sufficient to ensure that impacts associated with the project are minimised.

It is also noted that the EPA have reviewed the AQIA and raised no concerns with the assessment methodology employed.

5.2 Submission 2 (SE-74848241)

A public submission was received by DPHI. The contact details of the member of the public making the submission have been redacted.

The project will excessively reduce on-street parking spaces available for the community as it:

- **removes 5 on-street car parking spaces**
- **only provides 13 on-site car parking spaces against the 52 on-site car parking spaces required by the Bayside DCP. Of these 13 car parking spaces provided, only 9 are for staff. This will result in staff parking on the street further reducing on-street car parking spaces for other community users.**

The project should be redesigned to prevent any reduction in on-street parking spaces and provide the on-site parking spaces required by the DCP. If can not be redesigned as such, then it should not proceed.

Loss of on-street parking has been further addressed in section 8.6 of the TIA (Appendix C).

The current development that is located at the site has a shortfall of 17 spaces which is expected to be contributing to the on-street car parking demand in the local area.

The proposed development makes provision for a total of 15 car parking spaces (comprising 11 staff spaces, which is the maximum number of full time equivalent (FTE) staff employed at the site, and four visitor spaces) in accordance with Council's post-lodgement requirements (see section 8.1.2 of Appendix C).

As the design of the project has demonstrated sufficient on-site parking to accommodate its maximum operational demands, it is expected that there will be a net reduction of up to 12 parking spaces in the on-street parking demand as a consequence of the development (i.e. existing car parking credit of 17 car spaces less the loss of 5 on-street car spaces).

5.3 Submission 3 (SE-74849957)

A public submission was received by DPHI. The contact details of the member of the public making the submission have been redacted.

I am worried about the probable contamination and noise outlined in the Appendix Q of the Report and I am not convinced it would be properly controlled as a safety hazard. I would prefer the Planning Authorities err on the side of caution and not approve this development in an area that is more suitable over time for residential construction.

The project aligns with the objectives of the land use zoning IN1 – General Industrial on which the proposed development is located. In addition, waste or resource management facilities are permitted with consent in accordance with Part 5.2 of the SEPP (Transport and Infrastructure) 2021.

A DSI, RAP and ASSMP were submitted with the EIS to assess and manage any potential contamination risk for the site. A site auditor was engaged to provide an interim opinion confirming the site can be made suitable, subjection to the completion of the pre-remediation activities and implementation of the final approved RAP, and was submitted with the EIS.

Section 6.9 of the EIS assesses the hazards and risks associated with the project and provides hazard management strategies that will be implemented. Section 6.9 concludes that hazardous materials and chemicals to be stored on site do not exceed the screening thresholds of Applying SEPP 33 and therefore does not fit the definition of 'potentially hazardous industry' or 'hazardous storage establishment'. Therefore, a preliminary hazard analysis (PHA) is not required.

In addition, emissions related to air, noise and water from the construction and operation of the project have been assessed to determine if the project will fall under the category of a potentially offensive industry. The findings indicate that the project is not expected to generate pollution at levels deemed unacceptable, thereby avoiding impact on the amenity of the area. Consequently, it is determined that the project is not a potentially offensive industry.

A NVIA was submitted with the EIS and has been updated and attached as Appendix J, which concludes that the project is compliant with the relevant noise and vibration criteria controls for this type of development, and it is expected to comply with the applicable regulations with regards to noise and vibration, subject to the mitigation measures outlined within Section 9 and Section 10 of the NVIA.

5.4 Submission 4 (SE-74849981)

A public submission was received by DPHI. The contact details of the member of the public making the submission have been redacted.

Given this project will take waste vegetation material I object to its placement near housing and the local school. There is no indication that this facility will not take asbestos or other hazardous building materials. There are also food and alcohol manufacturers adjacent to this proposed waste facility that may be impacted by dust or airbourne pollutants.

The school is of particular concern also. I note the facility will also run 24/7.

As detailed in section 6.9.4.1 of the EIS, the Waste Classification Guidelines (2014) describe non-putrescible materials as those that "typically do not: readily decay under standard conditions, emit offensive odours, attract vermin or other vectors (such as flies, birds and rodents)". As the site will only handle non-putrescible waste, offensive odours are not expected.

The project will have management procedures in place to ensure vegetation waste will not compost on site and the site will not accept putrescible waste or kerbside green waste from council collections.

Section 3.4.7.1 of the EIS describes the incoming waste procedure and details prohibited waste types (non-exhaustive list), including asbestos, food waste, putrescible waste, liquid waste and other hazardous waste. Section 6.2.3 of the EIS includes the management strategies to demonstrate how the facility will comply with EPA standards for managing construction waste in NSW (2018).

An AQIA was undertaken and submitted with the EIS which concludes that the construction and operational phases of the project will not result in any exceedances of the relevant air quality criteria at the surrounding receivers. It is considered that the implementation of the construction and operational phase mitigation methods and good site management practices will be sufficient to ensure that air quality impacts associated with the project are minimised.

As detailed in Section 3.4.1 of the EIS the proposed operating hours are 24-hours, 7 days a week to allow the facility to capture waste generated from the increasing number of sites undertaking construction activities outside of standard construction hours. However, 80% of the truck movements will occur during the day time and 20% at night (refer to Section 9.2.2 and 9.2.3 of the TIA).

A NVIA was submitted with the EIS and has been updated and attached as Appendix J, which concludes that the project is compliant with the relevant noise and vibration criteria controls for this type of development, and it is expected to comply with the applicable regulations with regards to noise and vibration, subject to the mitigation measures outlined within Section 9 and Section 10 of the NVIA.

5.5 Submission 5 (SE-74851230)

A public submission was received by DPHI. The contact details of the member of the public making the submission have been redacted.

Community and stakeholders within the community namely residents and local business owners have not been adequately advised and notified of the proposed DA.

It notes within the submission that residents and business owners were delivered flyers "600 between 14-20th November 2023" within the catchment.

I have a local business within the catchment and did not receive any flyer or information in the forum held.

Nor did I receive information in the webpage.

Furthermore I don't believe 600 flyers is sufficient for a catchment that contains over 25,000 residents and business owners/employees.

Furthermore I don't believe the consultation with Bayside Council adequately address the communities concerns (submitted through the online survey) pertaining to use of Botany Road for large Hervey vehicles.

An engagement report including a community and engagement strategy was undertaken in accordance with Undertaking Engagement Guidelines for State Significant Projects (DPHI, 2024) and submitted with the EIS.

Determination of the community catchment was detailed in section 3 of the engagement report and was formed based on the terrain and surrounding infrastructure that influence potential

impacts on the community, including Botany Road and General Holmes Drive (M1) Mill Stream, Mill Pond and Sir Joseph Banks Park.

Details of the engagement activities were provided in section 3.3 of the engagement report.

While the project is a state project and council are responsible for the traffic management on Botany Rd, I don't think an adequate resolution to this management to minimise the use of Botany Rd For heavy Vehicles has been properly addressed.

My business is on Botany Rd - I watch at least 5-6 semi trailers with loads drive down it every day.

Despite the requirement for them to use Foreshore Rd as outlined in your submission WHO IS GOING TO ENFORCE THIS.

An updated TIA has been provided as Appendix C, which addresses all of Council's comments following the submission of the EIS and similarly addresses community concerns.

A future operational plan of management will be implemented requiring all heavy vehicles to arrive/depart via General Holmes Drive (M1). This plan of management will specifically note that no heavy vehicles are to access the site from the east via Hale Street (east of Luland Street) or Luland Street. A “NO RIGHT TURN” sign will be installed opposite the commercial vehicle driveway facing westbound traffic on Hale Street. A “NO LEFT TURN” sign will be installed within the site on the exit side of the commercial vehicle driveway.

A traffic management plan will be committed to which will outline the approved traffic routes. This management plan will form a condition of development consent and CPG and KLF will be required to comply with the requirements of the plan during construction and operation.

I'd also like to highlight the fact the current ground contamination is a real concern and residents should be notified about the remedial process so they can make adequate arrangements and adjustments to their own home during this time.

When is it likely to be of highest concern during development stages?

What is being proposed to minimise risk of small particles in the air during development and remedy of the site?

Thankyou for taking the time to read my submission

A RAP was undertaken and submitted with the EIS. The RAP details site management in section 9, with air quality management strategies specified in Section 9.6. During remedial works, dust emissions and any odours will be confined within the site boundary. Section 9.12 of the RAP conveys that owners and/or occupants of premises adjoining the site will be notified at least seven days prior to the commencement of remedial works.

5.6 Submission 6 (SE-74853711)

A public submission was received by DPHI. The contact details of the member of the public making the submission have been redacted.

I object as the site will create incremental pollution in the area with the creation of extra noise, smell and potential dangerous material in an area where there is already too much pollution with the airport and port.

A NVIA was submitted with the EIS and has been updated and attached as Appendix J, which concludes that the project is compliant with the relevant noise and vibration criteria controls for this type of development, and it is expected to comply with the applicable regulations with regards

to noise and vibration, subject to the mitigation measures outlined within Section 9 and Section 10 of the NVIA.

As detailed in Section 6.9.4.1 of the EIS, the Waste Classification Guidelines (2014) describe non-putrescible materials as those that “typically do not: readily decay under standard conditions, emit offensive odours, attract vermin or other vectors (such as flies, birds and rodents)”. As the site will only handle non-putrescible waste, offensive odours are not expected.

The project will have management procedures in place to ensure vegetation waste will not compost on site and the site will not accept putrescible waste or kerbside green waste from Council collections.

Section 3.4.7.1 of the EIS describes the incoming waste procedure and details prohibited waste types (non-exhaustive list), including asbestos, food waste, putrescible waste, liquid waste and other hazardous waste. Section 6.2.3 of the EIS includes the management strategies to demonstrate how the facility will comply with EPA standards for managing construction waste in NSW (2018).

An AQIA was undertaken and submitted with the EIS, which concludes that the construction and operational phases of the project will not result in any exceedances of the relevant air quality criteria at the surrounding receivers. It is considered that the implementation of the construction and operational phase mitigation methods and good site management practices potential air quality impacts associated with the project will be minimised.

Technical assessments have included cumulative impact assessment with surrounding developments.

5.7 Submission 7 (SE-74944209)

A public submission was received by DPHI. The contact details of the member of the public making the submission have been redacted.

N/A.

No response necessary.

5.8 Submission 8 (SE-74957228)

A public submission was received by DPHI. The contact details of the member of the public making the submission have been redacted.

The traffic in Botany is already a nightmare. This particular bottle neck at the bottom of Hale street in the mornings and afternoons will be made far worse with up to 200 truck movements a day. These trucks will be lining up waiting and blocking the road as access is inadequate. I cannot see in any reasonable terms that this much traffic directed into a small area can work.

A TIA has been submitted with the EIS and an updated version is provided as Appendix C. Traffic generation arising from the project has been assessed having regard for the proposed site operations and results in a net traffic generation reduction during both the morning and afternoon peak periods.

Notwithstanding, conservative SIDRA modelling has been undertaken for existing and future year (10 year horizon) scenarios demonstrating all key intersections will operate satisfactorily at LoS C or better, with spare capacity. As such, no external infrastructure improvements (intersection upgrades etc) are required from a transport planning perspective to accommodate the project.

A queuing assessment has been provided as Section 9.8 in the TIA and concludes that all nominal queuing demands are expected to be satisfactorily accommodated entirely within the site under extremely conservative operational conditions, and the development is expected to operate satisfactorily without impacting the operation of Hale Street.

Traffic aside, the environmental impacts that this waste management facility will have on the surrounding business, schools and residents in my opinion is totally unacceptable. Botany was once an industrial area but the council and governments have slowly allowed this to change into mostly residential and as such proposals like these shouldn't even be on the table.

Impacts to the natural and built environments and social impacts have been assessed using the most recent and accurate scientific data relevant to the site and adopted conservative assumptions so the upper limit of likely impacts could be assessed.

Detailed assessment undertaken by appropriate technical specialists demonstrates that on balance the project is unlikely to have significant impact on the receiving environment. On this basis, the project is not considered to be contrary to the public interest.

The project has been assessed in accordance with the SEARs, current environmental legislation and regulatory requirements. Where necessary, appropriate management and mitigation measures have been identified to promote environmental conservation or minimise impact to the surrounding community.

The proposed development aligns with the objectives of the land use zoning IN1 – General Industrial on which the proposed development is located. In addition, waste or resource management facilities are permitted with consent in accordance with Part 5.2 of the SEPP (Transport and Infrastructure) 2021. The proposed operations are therefore considered a valid and permissible development in the current land use zone.

5.9 Submission 9 (SE-75011226)

A public submission was received by DPHI from Ferdiana Jestin.

Hello,

I am local resident with two young children under 10 years old.

The location of Botany waste project is less than 500m from me and BOTANY PUBLIC SCHOOL. I know also there are so many young children under age of 14 years old resides in this particular spot. These children are very young and the possibility of contamination of the waste are very dangerous for them: eg airborne risk, ground water contamination etc.

Please please consider of these children future health, would NSW Goverment be willing to guarantee that there will be no impact for these childrens health in the future? Would NSW Government willing to be held responsible if there is any proof in the future that this waste project caused harm to these children in the local area?

The project aligns with the objectives of the land use zoning IN1 – General Industrial on which the proposed development is located. In addition, waste or resource management facilities are permitted with consent in accordance with Part 5.2 of the SEPP (Transport and Infrastructure) 2021. The proposed operations are therefore considered a valid and permissible development in the current land use zone.

Section 3.4.7.1 of the EIS describes the incoming waste procedure and details prohibited waste types (non-exhaustive list), including asbestos, food waste, putrescible waste, liquid waste and other hazardous waste. Section 6.2.3 of the EIS includes the management strategies to

demonstrate how the facility will comply with EPA standards for managing construction waste in NSW (2018).

Section 6.9 of the EIS assesses the hazards and risks associated with the project and provides hazard management strategies that will be implemented. Section 6.9 concludes that hazardous materials and chemicals to be stored on site do not exceed the screening thresholds of Applying SEPP 33 and therefore does not fit the definition of 'potentially hazardous industry' or 'hazardous storage establishment'. Therefore, a preliminary hazard analysis (PHA) is not required.

In addition, emissions related to air, noise and water from the construction and operation of the project have been assessed to determine if the project will fall under the category of a potentially offensive industry. The findings indicate that the project is not expected to generate pollution at levels deemed unacceptable, thereby avoiding impact on the amenity of the area. Consequently, it is determined that the project is not a potentially offensive industry.

In summary, detailed assessment undertaken by appropriate technical specialists demonstrates that on balance the project is unlikely to have significant impact on the receiving environment. On this basis, the project is not considered to be contrary to the public interest.

The project has been assessed in accordance with the SEARs, current environmental legislation and regulatory requirements. Where necessary, appropriate management and mitigation measures have been identified to promote environmental conservation or minimise impact to the surrounding community.

The location of this Botany waste project is so closed to the water, its very risky for the water to be contaminated. There will always be defect with science & technology, if there would be some sort of leak that contaminate the ground water, again, would NSW Government would be willing to be held responsible?

I am really disappointed that NSW Government even consider creating a waste project that is so closed to a public school, resident & water. Please please consider other location that is more remote & as away as possible from children.

Thank you

Section 10.4 of the flood impact assessment, updated and attached as Appendix D details containment of contamination in a flood event. Notable outcomes include:

- There is no putrescible waste or leachate present on this site.
- Chemicals are limited to a self-bunded diesel tank, and very small quantities of maintenance oils, grease and general cleaning chemicals will be stored in designated and bunded storage areas within the warehouse.
- The waste materials being sorted are primarily concrete, bricks, wood, plastic, paper, soil, and metal. All materials are contained within the building and building doors will be closed during a flood event preventing material from leaving the building. None of this material is conducive to floating or moving in low velocity flood waters. Therefore, the risk of "hazardous" or any other substances being released from the site in a flood event is very low and highly unlikely.
- The operations will be fully protected to 500 mm above the 1% AEP flood event.
- For events of greater intensity (i.e. probable maximum flood (PMF)) there is minimal storage of chemicals or hazardous materials onsite and as noted above there will be very low risk of contaminant release.

5.10 Submission 10 (SE-75021478)

A public submission was received by DPHI. The contact details of the member of the public making the submission have been redacted.

The proposed site is alarmingly close to Sir Joseph Banks Park and Mill Ponds, areas that are integral to the local environment and community. Mill Pond, in particular, has already suffered significant pollution, and placing a waste management facility in such proximity would exacerbate the issue, further degrading the water quality and harming the surrounding ecosystem.

All wastewater will be discharge to the sewer system and no off-site discharge to Mill Pond will occur.

Section 10.4 of the flood impact assessment, updated and attached as Appendix D details containment of contamination in a flood event. Notable outcomes include:

- There is no putrescible waste or leachate present on this site.
- Chemicals are limited to a self-bunded diesel tank, and very small quantities of maintenance oils, grease and general cleaning chemicals stored in designated storage areas within the warehouse.
- The waste materials being sorted are primarily concrete, bricks, wood, plastic, paper, soil, and metal. All materials are contained within the building and building doors will be closed during a flood event preventing material from leaving the building. None of this material is conducive to floating or moving in low velocity flood waters. Therefore, the risk of "hazardous" or any other substances being released from the site in a flood event is very low and highly unlikely.
- The operations onsite are fully protected to 500 mm above the 1% AEP flood event. For events of greater intensity (i.e. PMF) there is minimal storage of chemicals or hazardous materials onsite and as noted above very low risk contaminant release.

The health and safety of local residents, including children attending Botany Public School, are at risk. The introduction of a large-scale waste management facility could increase exposure to hazardous materials and pollutants, jeopardizing the well-being of the community, especially vulnerable populations like schoolchildren.

Section 3.4.7.1 of the EIS describes the incoming waste procedure and details prohibited waste types (non-exhaustive list) including: asbestos, food waste, putrescible waste, liquid waste and other hazardous waste. Section 6.2.3 of the EIS includes the management strategies to demonstrate how the facility will comply with NSW EPA standards for managing construction waste in NSW (2018).

An AQIA was undertaken and submitted with the EIS which concludes that the construction and operational phases of the Proposal would not result in any exceedances of the relevant air quality criteria at the surrounding receivers. It is considered that the implementation of the construction and operational phase mitigation methods and good site management practices would be sufficient to ensure that impacts associated with the Proposal are minimised.

In summary, detailed assessment undertaken by appropriate technical specialists demonstrates that on balance the project is unlikely to have significant impact on the receiving environment. On this basis, the project is not considered to be contrary to the public interest.

The project has been assessed in accordance with the SEARs, current environmental legislation and regulatory requirements. Where necessary, appropriate management and mitigation measures have been identified to promote environmental conservation or minimise impact to the surrounding community.

The proposed facilitys capacity is going to generate a substantial increase in traffic, particularly on Hale Street and Foreshore Road. Hale Street is already heavily congested with heavy vehicles, and adding more traffic from waste management operations will exacerbate the situation, leading to increased risk of accidents.

Traffic generation arising from the project has been assessed having regard for the proposed site operations and results in a net traffic generation reduction during both the morning and afternoon peak periods.

Notwithstanding, conservative SIDRA modelling has been undertaken for existing and future year (10 year horizon) scenarios demonstrating all key intersections will operate satisfactorily at LoS C or better, with spare capacity. As such, no external infrastructure improvements (intersection upgrades etc) are required from a transport planning perspective to accommodate the proposed development.

A queuing assessment has been provided as Section 9.8 in the TIA and concludes that all nominal queuing demands are expected to be satisfactorily accommodated entirely within the site under extremely conservative operational conditions, and the development is expected to operate satisfactorily without impacting the operation of Hale Street**.**

It is also noted that the TIA has been reviewed by TfNSW with no comment received.

There is already a waste management facility operated by Wanless Recycle at the end of Bay Street, located just a few hundred meters from the public school. The trucks servicing this facility are often seen driving recklessly through narrow streets, posing a significant danger to pedestrians and other road users. Adding another facility in close proximity would likely compound these issues, making the area even less safe.

A crash data analysis has been undertaken in Section 5.2 of the TIA (Appendix C) for the most recent five year period between 2019 and 2023 and reveal no clear indication of recurring crash themes nor any existing underlying road safety issues. The proposed development, which has been assessed to result in a net reduction in the traffic generation potential of the site, is not expected to contribute to any notable change in relation to the number of crashes in the vicinity of the site.

5.11 Submission 11 (SE-75022457)

A public submission was received by DPHI from R Browne.

I live close to this development and my biggest concerns are as follows. The noise as no other business runs 24/7 in the area. The smell and possible pollutants, toxins, dirt and possible asbestos being dispersed.

Surrounding developments in the area listed in the cumulative impact Section 2.7 of the EIS all are approved or proposed to operate 24/7, which is common for these developments.

It is noted waste will not be processed at this facility, only separated and transported. As detailed in Section 3.4.1 of the EIS, the justification for 24/7 operation is to allow the facility to capture waste generated from the increasing number of sites undertaking construction activities outside of standard construction hours. However, 80% of the truck movements will occur during the day time and 20% at night (See section 9.2.2 and 9.2.3 of the TIA).

The site will only handle non-putrescible waste and as such offensive odours are not expected.

Section 3.4.7.1 of the EIS describes the incoming waste procedure and details prohibited waste types (non-exhaustive list), including asbestos, food waste, putrescible waste, liquid waste and other hazardous waste. Section 6.2.3 of the EIS includes the management strategies to demonstrate how the facility will comply with EPA standards for managing construction waste in NSW (2018).

An AQIA was undertaken and submitted with the EIS, which concludes that the construction and operational phases of the project will not result in any exceedances of the relevant air quality criteria at the surrounding receivers. It is considered that the implementation of the construction

and operational phase mitigation methods and good site management practices potential air quality impacts associated with the project will be minimised.

Hale street is already banked up at certain times and can not handle existing traffic let alone what is proposed trucks every 2 min. While Erith street is zoned business it still contains many residential properties and this proposal will have adverse affects on all of the residents.

Traffic generation arising from the project has been assessed having regard for the proposed site operations and will result in a net traffic generation reduction during both the morning and afternoon peak periods.

Notwithstanding, conservative SIDRA modelling has been undertaken for existing and future year (10 year horizon) scenarios demonstrating all key intersections will operate satisfactorily at LoS C or better, with spare capacity. As such, no external infrastructure improvements (intersection upgrades etc) are required from a transport planning perspective to accommodate the proposed development.

5.12 Submission 12 (SE-75272489)

A public submission was received by DPHI. The contact details of the member of the public making the submission have been redacted.

The Hale Street Waste Management project is too close to Botany Public School and will be a health risk to the children and also to the residents living and working next to the waste facility. Old building materials in Australia very often has asbestos and other toxic materials, and asbestos is often hidden amongst waste material.

The proposed development aligns with the objectives of the land use zoning IN1 – General Industrial on which the proposed development is located. In addition, waste or resource management facilities are permitted with consent in accordance with Part 5.2 of the SEPP (Transport and Infrastructure) 2021. The proposed operations are therefore considered a valid and permissible development in the current land use zone.

Section 3.4.7.1 of the EIS describes the incoming waste procedure and details prohibited waste types (non-exhaustive list), including asbestos, food waste, putrescible waste, liquid waste and other hazardous waste. Section 6.2.3 of the EIS includes the management strategies to demonstrate how the facility will comply with EPA standards for managing construction waste in NSW (2018).

Section 6.9 of the EIS assesses the hazards and risks associated with the project and provides hazard management strategies that will be implemented. Section 6.9 concludes that hazardous materials and chemicals to be stored on site do not exceed the screening thresholds of Applying SEPP 33 and therefore does not fit the definition of ‘potentially hazardous industry’ or ‘hazardous storage establishment’. Therefore, a PHA is not required.

In addition, emissions related to air, noise and water from the construction and operation of the project have been assessed to determine if the project will fall under the category of a potentially offensive industry. The findings indicate that the project is not expected to generate pollution at levels deemed unacceptable, thereby avoiding impact on the amenity of the area. Consequently, it is determined that the project is not a potentially offensive industry.

In summary, detailed assessment undertaken by appropriate technical specialists demonstrates that on balance the project is unlikely to have significant impact on the receiving environment. On this basis, the project is not considered to be contrary to the public interest.

The project has been assessed in accordance with the SEARs, current environmental legislation and regulatory requirements. Where necessary, appropriate management and mitigation measures have been identified to promote environmental conservation or minimise impact to the surrounding community.

The facility is also next to the Mill Stream Pond River which flows into Botany Bay. Fish from Botany Bay are consumed by locals. The water in Botany Bay is already polluted, there is no need to increase the water, noise and air pollution.

Section 10.4 of the flood impact assessment, updated and attached as Appendix D details containment of contamination in a flood event. Notable outcomes include:

- There is no putrescible waste or leachate present on this site.
- Chemicals are limited to a self-bunded diesel tank, and very small quantities of maintenance oils, grease and general cleaning chemicals will be stored in designated and bunded storage areas within the warehouse.
- The waste materials being sorted are primarily concrete, bricks, wood, plastic, paper, soil, and metal. All materials are contained within the building and building doors will be closed during a flood event preventing material from leaving the building. None of this material is conducive to floating or moving in low velocity flood waters. Therefore, the risk of “hazardous” or any other substances being released from the site in a flood event is very low and highly unlikely.
- The operations will be fully protected to 500 mm above the 1% AEP flood event.
- For events of greater intensity (i.e. probable maximum flood (PMF)) there is minimal storage of chemicals or hazardous materials onsite and as noted above there will be very low risk of contaminant release.

An AQIA was undertaken and submitted with the EIS, which concludes that the construction and operational phases of the project will not result in any exceedances of the relevant air quality criteria at the surrounding receivers. It is considered that the implementation of the construction and operational phase mitigation methods and good site management practices potential air quality impacts associated with the project will be minimised.

Nearby Booralee Street and Bay Street are of historic and cultural significance, and the area should be improved for residents and visitors.

As detailed in Section 6.12 of the EIS, construction of the project is not expected to impact on local heritage items due to the limited nature of the works and the separation distance to heritage items.

The waste transfer station will be visually consistent with other industrial buildings in the area and should not further obscure the view of surrounding local heritage items from the general public.

Additionally, road traffic associated with the operation and construction of the site will not use Erith Street and Bay Street, where the closest local heritage items are located. Therefore, impacts to heritage items are not expected and a full heritage impact assessment is not required.

Hale Street is already a very noisy area from airplanes at Sydney Airport and truck and car traffic along Foreshore Road. The noise travels along Hale Street, and the noise has been irritating since Hale Street was opened to traffic from Foreshore Road in 2011.

A NVIA was submitted with the EIS and has been updated and attached as Appendix J which concludes that the project is compliant with the relevant noise and vibration criteria controls for this type of development, and it is expected to comply with the applicable regulations with regards to noise and vibration, subject to the mitigation measures outlined within Section 9 and Section 10 of the NVIA.

The NVIA includes a cumulative impact assessment with operation of surrounding developments.

The current site at Hale Street could be put to better use, such as a gymnasium for Botany Public School and local children.

The proposed development aligns with the objectives of the land use zoning IN1 – General Industrial on which the proposed development is located. In addition, waste or resource management facilities are permitted with consent in accordance with Part 5.2 of the SEPP (Transport and Infrastructure) 2021. The proposed operations are therefore considered a valid and permissible development in the current land use zone.

5.13 Submission 13 (SE-75292458)

A public submission was received by DPHI from Eileen Tinker.

Obviously, the majority of the vehicles going to this facility would be during the normal working day therefore it would place an excessive amount of extra vehicles entering and leaving Foreshore Rd. Hale St is a single lane road as it comes off of Foreshore Rd and already carries a large amount of traffic especially in peak hours I do not consider this facility appropriate for 2 - 4 Hale St Botany for the following reasons

Should there be the slightest little hiccup at the junction of this facility traffic on Foreshore Rd could be brought to a standstill. Vehicles over a 6 ton are not allowed through Botany so the only way vehicles when exiting this proposed facility can go when coming out of the site is to turn right on to a single lane bridge toward Foreshore Rd and in peak hours this would be virtually impossible. Regards smaller vehicles that could turn left this then puts extra traffic along Underwood Rd and they then have to turn right into Bay Street which in peak hours is already at capacity also where there is a primary school

Traffic generation arising from the project has been assessed having regard for the proposed site operations and will result in a net traffic generation reduction during both the morning and afternoon peak periods.

Notwithstanding, conservative SIDRA modelling has been undertaken for existing and future year (10 year horizon) scenarios demonstrating all key intersections will operate satisfactorily at LoS C or better, with spare capacity. As such, no external infrastructure improvements (intersection upgrades etc) are required from a transport planning perspective to accommodate the proposed development.

A queuing assessment has been provided as Section 9.8 in the TIA and concludes that all nominal queuing demands are expected to be satisfactorily accommodated entirely within the site under extremely conservative operational conditions, and the development is expected to operate satisfactorily without impacting the operation of Hale Street, or roadways further afield.

Noise. We have been told the estimated number of trucks daily but there will be a constant background noise 24/7 from equipment such as bulldozers, diggers, excavators etc.

A NVIA was submitted with the EIS and has been updated and attached as Appendix J, which concludes that the project willcomply with the relevant noise and vibration criteria controls for this type of development, and it is expected to comply with the applicable regulations with regards to noise and vibration, subject to the mitigation measures outlined within Section 9 and Section 10 of the NVIA.

Smell. I feel that there will be a constant smell of rotting food and vegetation and in the summer this would be unbearable making it impossible to use any outdoor facility.

As detailed in section 6.9.4.1 of the EIS, the Waste Classification Guidelines (2014) describe non-putrescible materials as those that “typically do not: readily decay under standard conditions, emit

offensive odours, attract vermin or other vectors (such as flies, birds and rodents)". As the site will only handle non-putrescible waste, offensive odours are not expected.

The proposed development will have management procedures in place to ensure vegetation waste will not compost on site and the site will not accept putrescible waste or kerbside green waste from Council collections.

Then there is the question of airborne dust, such as asbestos, which they wont be able to guarantee is not coming in from building sites, plus cement dust to name just a couple.

An AQIA was undertaken and submitted with the EIS, which concludes that the construction and operational phases of the project will not result in any exceedances of the relevant air quality criteria at the surrounding receivers. It is considered that the implementation of the construction and operational phase mitigation methods and good site management practices potential air quality impacts associated with the project will be minimised.

Section 3.4.7.1 of the EIS describes the incoming waste procedure and details prohibited waste types (non-exhaustive list), including asbestos, food waste, putrescible waste, liquid waste and other hazardous waste. Section 6.2.3 of the EIS includes the management strategies to demonstrate how the facility will comply with EPA standards for managing construction waste in NSW (2018).

I understand the soil at the proposed site is already contaminated and that any excavation work to build this facility will disturb hazardous soil materials containing chemicals, asbestos and other poisonous materials present and could lead to hazardous materials becoming airborne with a risk to health of the local community

A RAP was submitted with the EIS, which documents the procedures and standards to be followed to remove the risks posed by the identified potential contamination issues and make the site suitable for the project, while ensuring the protection of human health and the surrounding environment.

We, and many other people, bought our houses in Botany knowing that the Airport and docks were there but since buying our properties the 3rd runway has opened at the airport, when this runway was put in we were told no planes would be allowed to take off east to west, this was changed when the Howard government were elected so we now have to contend with the extra noise and though they did the airport noise project when all our house were given noise insulation this did not help if one wanted to have friends and/or family over for an outside venue or just a social cup of tea. Planes are not allowed to take off or land between the hours of 11,00pm to 6.00 am however this facility would 24hr.

Surrounding developments in the area listed in the cumulative impact Section 2.7 of the EIS all are approved or proposed to operate 24/7, which is common for these developments.

It is noted waste will not be processed at this facility, only separated and transported. As detailed in Section 3.4.1 of the EIS, the justification for 24/7 operation is to allow the facility to capture waste generated from the increasing number of sites undertaking construction activities outside of standard construction hours. However, 80% of the truck movements will occur during the day time and 20% at night (See section 9.2.2 and 9.2.3 of the TIA).

A NVIA was submitted with the EIS and has been updated and attached as Appendix J, which concludes that the project will comply with the relevant noise and vibration criteria inclusive of the evening and night period.

The docks have been extended causing extra traffic with trucks already queuing along Foreshore Rd waiting to get into the site.

We already get excessive dirt from the planes and I feel this facility would cause more airborne dust and dirt being detrimental to the health of local residents if it is allowed.

My home, at 18 Erith St., which I bought before the airport noise debacle, is one of the closest to this proposed Waste Management Facility and I think that the stench, especially in summer would be beyond description , and I feel that with the constant background noise of large vehicles and heavy machinery it would make it impossible to have any outdoor social life whatsoever.

The increase in traffic through Hale St, which is already beyond capacity in both morning and evening peak hours would cause build up of vehicles trying to exit Chegwyn St as this is a one way Street so all traffic leaving the council carpark plus businesses in that street plus vehicles doing deliveries and pick ups would have difficulty exiting into Hale St.

The proposed development aligns with the objectives of the land use zoning IN1 – General Industrial on which the proposed development is located. In addition, waste or resource management facilities are permitted with consent in accordance with Part 5.2 of the SEPP (Transport and Infrastructure) 2021. The proposed operations are therefore considered a valid and permissible development in the current land use zone.

Section 3.4.7.1 of the EIS describes the incoming waste procedure and details prohibited waste types (non-exhaustive list), including asbestos, food waste, putrescible waste, liquid waste and other hazardous waste. Section 6.2.3 of the EIS includes the management strategies to demonstrate how the facility will comply with EPA standards for managing construction waste in NSW (2018).

Section 6.9 of the EIS assesses the hazards and risks associated with the project and provides hazard management strategies that will be implemented. Section 6.9 concludes that hazardous materials and chemicals to be stored on site do not exceed the screening thresholds of Applying SEPP 33 and therefore does not fit the definition of 'potentially hazardous industry' or 'hazardous storage establishment'. Therefore, a PHA is not required.

In addition, emissions related to air, noise and water from the construction and operation of the project have been assessed to determine if the project will fall under the category of a potentially offensive industry. The findings indicate that the project is not expected to generate pollution at levels deemed unacceptable, thereby avoiding impact on the amenity of the area. Consequently, it is determined that the project is not a potentially offensive industry.

In summary, detailed assessment undertaken by appropriate technical specialists demonstrates that on balance the project is unlikely to have significant impact on the receiving environment. On this basis, the project is not considered to be contrary to the public interest.

The project has been assessed in accordance with the SEARs, current environmental legislation and regulatory requirements. Where necessary, appropriate management and mitigation measures have been identified to promote environmental conservation or minimise impact to the surrounding community.

5.14 Submission 14 (SE-75302707)

A public submission was received by DPHI from Selwyn Garwell.

I am primarily concerned by the extra traffic the proposal will generate in both Hale street and adjoining streets which are already struggling with heavy traffic; frequently causing extensive traffic delays.

Attached please find a petition signed by eighteen affected businesses AND four photographs that illustrate our point.

Thank you for considering our submission.

Traffic generation arising from the project has been assessed having regard for the proposed site operations and will result in a net traffic generation reduction during both the morning and afternoon peak periods.

Notwithstanding, conservative SIDRA modelling has been undertaken for existing and future year (10 year horizon) scenarios demonstrating all key intersections will operate satisfactorily at LoS C or better, with spare capacity. As such, no external infrastructure improvements (intersection upgrades etc) are required from a transport planning perspective to accommodate the proposed development.

We the undersigned would like to bring the department's attention that Hale Street, Botany currently suffers from serious traffic congestion especially in the morning and afternoon peak periods as well as a significant shortage of parking.

The loss of five parking spaces and an additional 412 trucks (94 of which will be B doubles) will obviously exacerbate the problem greatly as well as contribute markedly to local pollution. At different times of the day traffic is banked up bumper to bumper; eastwards in the morning and westwards in the afternoon.

The junction with Foreshore Road will also be affected negatively as traffic is often exceedingly heavy near the interface.

Entrance and egress to the other businesses in the surrounding area already has to be avoided if possible in peak hours; if this development went ahead it would be largely impractical all day.

The large trucks including B doubles currently accessing "Portair" regularly cause damage to the gutters, electricity poles etc. This will inevitably increase.

Loss of on-street parking has been addressed in Section 8.6 of the TIA (Appendix C).

The current development that is located at the site has a shortfall of 17 spaces, which is expected to be contributing to the on-street car parking demand in the local area.

The design of the project makes provision for a total of 15 car parking spaces, comprising 11 staff and four visitor spaces, meeting Council's post-lodgement requirements (refer to Section 8.1.2 of the TIA).

As the proposed development will provide sufficient on-site parking to accommodate its maximum operational demands, it is expected that there will be a net reduction of up to 12 cars in the on-street parking demand as a consequence of the project (i.e. existing car parking credit of 17 car spaces less the loss of 5 on-street car spaces).

A queuing assessment has been provided as Section 9.8 in the TIA and concludes that all nominal queuing demands are expected to be satisfactorily accommodated entirely within the site under extremely conservative operational conditions, and the development is expected to operate satisfactorily without impacting the operation of Hale Street, or roadways further afield.

A crash data analysis has been undertaken in Section 5.2 of the TIA (Appendix C) for the most recent five year period between 2019 and 2023 and reveal no clear indication of recurring crash themes nor indication of any existing underlying road safety issues.

The project has been assessed to result in a net reduction in the traffic generation potential of the site, and is not expected to contribute to any notable change in relation to the number of crashes in the vicinity of the site.

5.15 Submission 15 (SE75304712)

A public submission was received by DPHI from Michelle Douglas.

I work for Lovatt Transport located at 32 Luland Street, Botany.

Factors that I feel should be considered are:

I see no Impact statement on the traffic on Hale Street and surrounding streets, only the main arterial roads or parking on Hale Street. Therefore, you should be made aware of the following traffic issues that we face every day.

The traffic turning into Foreshore during peak times is banked back through the airport tunnel on General Holmes Drive, then negotiating with other traffic to turn into Hale street is also difficult most days.

At the end of the day, the traffic is banked back to Botany Road from the traffic lights at Foreshore Road. This traffic continues through to M5 and back through Foreshore road.

I have also noticed the impact that congestion on Hale street has on trucks turning right from Foreshore (from the port district), this could cause significant delays and severely impact deliveries to and from the wharves.

The overpass on Hale Street is very narrow, considering the number of truck movements that are envisaged.

206 combined inbound/outbound deliveries per day would cause extreme traffic congestion on our already congested street and an accident or stoppage at the facility, would potentially result in gridlock. Trucks cannot divert along Botany Road, there is only one access to Luland street and the Port Air Industrial Estate where numerous truck deliveries are made throughout the day.

Traffic generation arising from the project has been assessed having regard for the proposed site operations and will result in a net traffic generation reduction during both the morning and afternoon peak periods.

Notwithstanding, conservative SIDRA modelling has been undertaken for existing and future year (10 year horizon) scenarios demonstrating all key intersections will operate satisfactorily at LoS C or better, with spare capacity. As such, no external infrastructure improvements (intersection upgrades etc) are required from a transport planning perspective to accommodate the proposed development.

A thorough Biodiversity Development Assessment Report must be undertaken,

A request for a biodiversity development assessment report (BDAR) Waiver was approved by DPHI on 1 December 2023 as summarised in Section 6.27 of the EIS.

Approval of the waiver reflects the limited biodiversity values on the site due to previous industrial development.

On the basis of the information gathered from a site inspection and desktop assessment by a qualified ecologist, the thresholds for the biodiversity offsets scheme are not triggered and the project will not have the potential to result in significant impact to threatened communities, populations or species afforded protection under the NSW *Biodiversity Conservation Act 2016* (BC Act) or Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

The NSW EPA specifically states "Poorly run waste management facilities can cause leachate, dust, offensive odours and noise. Poor waste disposal, especially of hazardous

wastes can result in harmful chemicals leaching into the soil, groundwater and surface water becoming a risk to human health and the environment." "An estimated 2 million tonnes of hazardous waste was generated in NSW in 2019-20. Asbestos and contaminated soils accounted for 72% of this" Source: Waste and Recycling | NSW State of the Environment.

Section 3.4.7.1 of the EIS describes the incoming waste procedure and details prohibited waste types (non-exhaustive list), including asbestos, food waste, putrescible waste, liquid waste and other hazardous waste.

Section 6.2.3 of the EIS includes the management strategies to demonstrate how the facility will comply with EPA standards for managing construction waste in NSW (2018).

The dust from unloading waste can cause air pollution and have a direct impact on the local school children, workers, residents and pets.

An AQIA was undertaken and submitted with the EIS, which concludes that the construction and operational phases of the project will not result in any exceedances of the relevant air quality criteria at the surrounding receivers. It is considered that the implementation of the construction and operational phase mitigation methods and good site management practices potential air quality impacts associated with the project will be minimised.

My employer and other stakeholders in the area were not informed of the proposal and therefore the employees were not informed. I do not believe effective and genuine community consultation was actually undertaken.

An engagement report, including a community and engagement strategy was carried out in accordance with Undertaking Engagement Guidelines for State Significant Projects (DPHI, 2024) and submitted with the EIS.

Determination of the community consultation effort was detailed in Section 3 of the engagement report and was formed based on the terrain and surrounding infrastructure that influence potential impacts on the community, including Botany Road and General Holmes Drive (M1), Mill Stream, Mill Pond and Sir Joseph Banks Park.

Details of the engagement activities were provided in Section 3.3 of the engagement report.

As Hale Street is known to flood at least annually during king tides and high rainfall, creating a Waste Management Facility on Hale Street could have significant impacts on the water management strategy. The proposal to have flood reduction facilities put in place to reduce the impact of flooding in Hale Street and the surrounding Botany areas as detailed in botany_bay_foreshore_beach_floodplain_risk_management_study_&_plan_version_e_part_b.pdf (nsw.gov.au)

A flood impact assessment and integrated water management report were prepared and submitted with the EIS. Updated versions are attached as Appendix D and Appendix F respectively.

Section 10.4 of the flood impact assessment, updated and attached as Appendix D details containment of contamination in a flood event. Notable outcomes include:

- There is no putrescible waste or leachate present on this site.
- Chemicals are limited to a self-bunded diesel tank, and very small quantities of maintenance oils, grease and general cleaning chemicals stored in designated storage areas within the warehouse.
- The waste materials being sorted are primarily concrete, bricks, wood, plastic, paper, soil, and metal. All materials are contained within the building and building doors will be closed during a flood event preventing material from leaving the building. None of this material is

conducive to floating or moving in low velocity flood waters. Therefore, the risk of “hazardous” or any other substances being released from the site in a flood event is very low and highly unlikely.

- The operations onsite are fully protected to 500 mm above the 1% AEP flood event. For events of greater intensity (i.e. PMF) there is minimal storage of chemicals or hazardous materials onsite and as noted above very low risk contaminant release.

This construction and operation will have significant negative impacts on the protected Biodiversity in the area located in Penrhyn Estuary and Foreshore Beach adjacent to Port Botany and situated close to Hale Street. These areas are home to a wide variety of native species including marine, migratory and shorebirds, mangroves and coastal saltmarsh and seagrasses. Port Botany | NSW Ports.

The construction will also have detrimental negative impacts on the partnership Bayside Council and NSW ports are participating in to restore the biodiversity at Sir Joseph Banks Park a crucial natural refuge. Sir Joseph Banks Park a 16-hectare reserve in Botany Bay which contains some of the last remnants of the endangered Eastern Suburbs Banksia Scrub. It plays a vital role in providing habitats for a diverse range of native wildlife, including the Yellow-tailed black cockatoo, ringtail possum, dwarf tree frog and eastern long-necked turtle. Restoring Botany Bay's Biodiversity - Conservation Volunteers Australia.

A request for a BDAR waiver was approved by DPHI on 1 December 2023 as summarised in Section 6.27 of the EIS. Approval of the waiver reflects the limited biodiversity values on the site due to previous industrial development.

On the basis of the information gathered from a site inspection and desktop assessment by a qualified ecologist, the thresholds for the biodiversity offsets scheme are not triggered and the project will not have the potential to result in significant impact to threatened communities, populations or species afforded protection under the BC Act or EPBC Act.

As committed to in Section 6.18 of the EIS, construction and operational environmental management plans will be prepared following approval of the project as nominated conditions or approval and will adopt the framework suggested by the ISO 14001:2015 Environmental Management Systems standards and with guidance from the Guideline for the Preparation of Environmental Management Plans (NSW DIPNR, 2004).

The management plans will include construction/operational conditions and controls, environmental management and procedures to address specific environmental aspects, and prevent indirect impacts off-site inclusive of biodiversity values near to the site.

Finally, I live at Kurnell. Breen Resources - Waste Management and Disposal Centre is situated on our only road access to the village. We endure the trucks and the waste that falls from the loads, that have resulted in several closures of the road and damage to cars. We also have the drivers of those types of trucks blatantly flouting the road rules and tailgating cars because they are paid by the load (not hourly) so they are always in a hurry. We certainly don't want this to occur on our local roads in Botany.

A crash data analysis has been undertaken in section 5.2 of the TIA (Appendix C) for the most recent five (5) year period between 2019 and 2023 and reveal no clear indication of recurring crash themes with no indication of any existing underlying road safety issues. The proposed development, which has been assessed to result in a net reduction in the traffic generation potential of the site, could not be expected to contribute to any notable change in relation to the number of crashes in the vicinity of the site.

A traffic management plan will be committed to which will outline the approved traffic routes. This management plan will form a condition of development consent and CPG and KLF will be required to comply with the requirements of the plan during construction and operation.

5.16 Submission 16 (SE-75314723)

A public submission was received by DPHI from Warren Gold.

I have noted the entrance to the proposed Waste Management Plant is to be by Hale St and Foreshore Rd, and the large number of trucks coming in and out each 24 hours. My home is on Botany Rd, very close to the traffic lights at Hale St where the trucks would turn in and out. Apart from the Botany Shopping centre, this part of Botany Rd is very residential. It seems sensible that the major entrance and exit point would be by Foreshore Rd. There are no homes in this area, noise at any time would not annoy any residents.

Traffic generation arising from the project has been assessed having regard for the proposed site operations and will result in a net traffic generation reduction during both the morning and afternoon peak periods.

Notwithstanding, conservative SIDRA modelling has been undertaken for existing and future year (10 year horizon) scenarios demonstrating all key intersections will operate satisfactorily at LoS C or better, with spare capacity. As such, no external infrastructure improvements (intersection upgrades etc) are required from a transport planning perspective to accommodate the proposed development.

A queuing assessment has been provided as Section 9.8 in the TIA and concludes that all nominal queuing demands are expected to be satisfactorily accommodated entirely within the site under extremely conservative operational conditions, and the development is expected to operate satisfactorily without impacting the operation of Hale Street, or roadways further afield.

A NVIA was submitted with the EIS and has been updated and attached as Appendix J, which concludes that the project will comply with the relevant road noise criteria.

Is the enclosed building, as I read in the proposal, to keep in the noise and any particles floating in the air.

To align with best practice handling and management of waste material, all material sorting will occur inside the warehouse building as detailed in Section 3 of the EIS.

I also read waste would be sorted into plant feed, clean concrete and brick, metal and light mixed waste. My presumption is there will be no human food rubbish. So I expect this plant will not give off any smells apart from plant smells.

As detailed in Section 6.9.4.1 of the EIS, the site will only handle non-putrescible waste and as such offensive odours are not expected.

The proposed development will have management procedures in place to ensure vegetation waste will not compost on site and the site will not accept putrescible waste or kerbside green waste from Council collections.

If my presumptions are correct and a majority of the truck movements will be by Foreshore Rd, I will be happy to support this project.

The truck routes aim to avoid residential areas and direct trucks to and from the M1, minimising impacts in the area. B-doubles will only use the approved 26 m B-double routes as detailed in Section 6.4.3.3 in the EIS. Entry and exit to the site will be via General Holmes Drive and Foreshore Road.

5.17 Submission 17 (SE-75354708)

A public submission was received by DPHI. The contact details of the member of the public making the submission have been redacted.

I heavily object to the submission of a waste management facility in the proposed location of Hale street.

It's close proximity to waterways (Mill Pond) and a Children's public school playground (Botany Bay School) is reason enough for this facility to not be approved. It's not physically possible for a 100% guarantee that dust and air pollution will be contained within the premises at all times let alone from the trucks carrying the waste/harmful chemicals during the construction or ongoing running of the facility.

The proposed development aligns with the objectives of the land use zoning IN1 – General Industrial on which the proposed development is located. In addition, waste or resource management facilities are permitted with consent in accordance with Part 5.2 of the SEPP (Transport and Infrastructure) 2021. The proposed operations are therefore considered a valid and permissible development in the current land use zone.

Section 3.4.7.1 of the EIS describes the incoming waste procedure and details prohibited waste types (non-exhaustive list), including asbestos, food waste, putrescible waste, liquid waste and other hazardous waste. Section 6.2.3 of the EIS includes the management strategies to demonstrate how the facility will comply with EPA standards for managing construction waste in NSW (2018).

Section 6.9 of the EIS assesses the hazards and risks associated with the project and provides hazard management strategies that will be implemented. Section 6.9 concludes that hazardous materials and chemicals to be stored on site do not exceed the screening thresholds of Applying SEPP 33 and therefore does not fit the definition of ‘potentially hazardous industry’ or ‘hazardous storage establishment’.

In addition, emissions related to air, noise and water from the construction and operation of the project have been assessed to determine if the project will fall under the category of a potentially offensive industry. The findings indicate that the project is not expected to generate pollution at levels deemed unacceptable, thereby avoiding impact on the amenity of the area. Consequently, it is determined that the project is not a potentially offensive industry.

In summary, detailed assessment undertaken by appropriate technical specialists demonstrates that on balance the project is unlikely to have significant impact on the receiving environment. On this basis, the project is not considered to be contrary to the public interest.

The project has been assessed in accordance with the SEARs, current environmental legislation and regulatory requirements. Where necessary, appropriate management and mitigation measures have been identified to promote environmental conservation or minimise impact to the surrounding community.

Stormwater from the site will be discharged to the sewer system via trade waste agreement and will not discharge off-site to Mill Pond.

Instead of looking at statistics and making decisions from a desk have someone physically view the already heavily congested traffic trying to enter and exit Hale street/foreshore road and general Holmes drive during peak times.

Consultants from Traffix have attended the site and surrounding area and the TIA has included traffic counts reflective of current traffic conditions along key roadways and intersection in the vicinity of the site..

1 single truck accident or breakdown will prevent complete access over the bridge which will then force trucks to use alternate routes through botany shops. These trucks could be carrying asbestos or hazardous materials and containment cannot be guaranteed.

Quite simply the proposal is a joke and should not have been considered considering it's location to waterways, primary school children and an already extremely heavily congested traffic hot spot.

The proposed operations are therefore considered a valid and permissible development in the current land use zone.

The site will not accept hazardous waste.

B-doubles will only use the approved 26 m B-double routes as detailed in Section 6.4.3.3 of the EIS. Entry and exit to the site will be via General Holmes Drive and Foreshore Road.

5.18 Submission 18 (SE-75356711)

A public submission was received by DPHI. The contact details of the member of the public making the submission have been redacted.

Health Concerns: The proposed waste management facility poses significant health risks to local residents, particularly given its proximity – less than 300 meters – from Botany Public School. Within this short distance, there are numerous residential homes directly impacted by potential airborne contaminants and unpleasant odors from the facility. Of particular concern is the handling of construction materials that may contain hazardous substances, such as asbestos, which could severely affect vulnerable populations, including children, the elderly, and individuals with respiratory conditions. The risk of exposure to these pollutants is unacceptable in such a densely populated and sensitive area.

The proposed development aligns with the objectives of the land use zoning IN1 – General Industrial on which the proposed development is located. In addition, waste or resource management facilities are permitted with consent in accordance with Part 5.2 of the SEPP (Transport and Infrastructure) 2021. The proposed operations are therefore considered a valid and permissible development in the current land use zone.

Section 3.4.7.1 of the EIS describes the incoming waste procedure and details prohibited waste types (non-exhaustive list), including asbestos, food waste, putrescible waste, liquid waste and other hazardous waste. Section 6.2.3 of the EIS includes the management strategies to demonstrate how the facility will comply with EPA standards for managing construction waste in NSW (2018).

Section 6.9 of the EIS assesses the hazards and risks associated with the project and provides hazard management strategies that will be implemented. Section 6.9 concludes that hazardous materials and chemicals to be stored on site do not exceed the screening thresholds of Applying SEPP 33 and therefore does not fit the definition of ‘potentially hazardous industry’ or ‘hazardous storage establishment’. Therefore, a PHA is not required.

In addition, emissions related to air, noise and water from the construction and operation of the project have been assessed to determine if the project will fall under the category of a potentially offensive industry. The findings indicate that the project is not expected to generate pollution at levels deemed unacceptable, thereby avoiding impact on the amenity of the area. Consequently, it is determined that the project is not a potentially offensive industry.

In summary, detailed assessment undertaken by appropriate technical specialists demonstrates that on balance the project is unlikely to have significant impact on the receiving environment. On this basis, the project is not considered to be contrary to the public interest.

The project has been assessed in accordance with the SEARs, current environmental legislation and regulatory requirements. Where necessary, appropriate management and mitigation measures have been identified to promote environmental conservation or minimise impact to the surrounding community.

Environmental Impact on Nearby Parks and Waterways: The proposed site is located adjacent to Sir Joseph Banks Park, the largest and most popular park in Botany, and also borders Mill Ponds. The facility's operations would undoubtedly deteriorate the local air quality and could lead to the pollution of these cherished green spaces and waterways. Such environmental degradation not only threatens wildlife and natural habitats but also diminishes the quality of life for residents who rely on these areas for recreation and community activities.

See above response regarding air quality.

A request for a BDAR waiver was approved by DPHI on 1 December 2023 as summarised in Section 6.27 of the EIS. Approval of the waiver reflects the limited biodiversity values on the site due to previous industrial development.

On the basis of the information gathered from a site inspection and desktop assessment by a qualified ecologist, the thresholds for the biodiversity offsets scheme are not triggered and the project will not have the potential to result in significant impact to threatened communities, populations or species afforded protection under the NSW *Biodiversity Conservation Act 2016* (BC Act) or Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

As committed to in Section 6.18 of the EIS, construction and operational environmental management plans will be prepared following approval of the project as nominated conditions or approval and will adopt the framework suggested by the ISO 14001:2015 Environmental Management Systems standards and with guidance from the Guideline for the Preparation of Environmental Management Plans (NSW DIPNR, 2004).

The management plans will include construction/operational conditions and controls, environmental management and procedures to address specific environmental aspects, and prevent indirect impacts off-site inclusive of biodiversity values near to the site.

Proximity to Existing Waste Facility and Safety Concerns: The proposed site is in close proximity to the existing Wanless Waste Management facility, which operates directly back-to-back on Bay Street. The trucks from Wanless Waste Management frequently speed along local roads, posing a clear safety hazard to residents and students at Botany Public School. The addition of another waste facility in such a small area would compound these safety risks, increasing the likelihood of dangerous driving behavior and putting the community's health and safety at further risk.

A crash data analysis has been undertaken in section 5.2 of the TIA (Appendix C) for the most recent five year period between 2019 and 2023 and reveal no clear indication of recurring crash themes nor indication of any existing underlying road safety issues.

The project has been assessed to result in a net reduction in the traffic generation potential of the site and is not expected to contribute to any notable change in relation to the number of crashes in the vicinity of the site.

Traffic and Safety Concerns: The introduction of another waste management facility would significantly increase the volume of heavy vehicles and trucks accessing local roads,

exacerbating existing traffic congestion and posing a serious safety risk to pedestrians, cyclists, and drivers. The current road infrastructure is not equipped to handle this heightened traffic flow, which would likely result in increased accidents, noise pollution, and disruptions to the daily lives of local residents. The safety of children walking to and from Botany Public School would be particularly compromised.

See response above regarding the crash data analysis undertaken and potential impact of the project on road and pedestrian safety.

Traffic generation arising from the project has been assessed having regard for the proposed site operations and will result in a net traffic generation reduction during both the morning and afternoon peak periods.

Notwithstanding, conservative SIDRA modelling has been undertaken for existing and future year (10 year horizon) scenarios demonstrating all key intersections will operate satisfactorily at LoS C or better, with spare capacity. As such, no external infrastructure improvements (intersection upgrades etc) are required from a transport planning perspective to accommodate the proposed development.

A queuing assessment has been provided as Section 9.8 in the TIA and concludes that all nominal queuing demands are expected to be satisfactorily accommodated entirely within the site under extremely conservative operational conditions, and the development is expected to operate satisfactorily without impacting the operation of Hale Street, or roadways further afield.

5.19 Submission 19 (SE-75361995)

A public submission was received by DPHI. The contact details of the member of the public making the submission have been redacted.

We live at very close proximity to the proposed Waste Management Facility and our 7 year old son attends the public school that is also neighbouring the site, and thus would also be negatively affected by this facility, and we feel great distress around this proposal! We're gravely concerned about the hazardous materials that would be dealt with their, the pollution caused by the waste as well as the large amount of vehicles that would be coming in and out of the facility and suburb daily, by the currently contaminated materials there being disturbed and circulated in the air and nearby waterworks, the noise, smells, traffic. Not only would residents nearby be affected but the WHOLE community through the children attending the school being exposed, and the suburb and nearby areas with all the increased traffic and particles carrying over. Botany Public School, Mill Ponds, residents need to be considered and this project needs to be rejected! We need to think about the population and children and the long term effects of these decisions!

The proposed operations are considered a valid and permissible development in the current land use zone.

Section 3.4.7.1 of the EIS describes the incoming waste procedure and details prohibited waste types (non-exhaustive list), including asbestos, food waste, putrescible waste, liquid waste and other hazardous waste. Section 6.2.3 of the EIS includes the management strategies to demonstrate how the facility will comply with EPA standards for managing construction waste in NSW (2018).

Section 6.9 of the EIS assesses the hazards and risks associated with the project and provides hazard management strategies that will be implemented. Section 6.9 concludes that hazardous materials and chemicals to be stored on site do not exceed the screening thresholds of Applying SEPP 33 and therefore does not fit the definition of ‘potentially hazardous industry’ or ‘hazardous storage establishment’.

In addition, emissions related to air, noise and water from the construction and operation of the project have been assessed to determine if the project will fall under the category of a potentially offensive industry. The findings indicate that the project is not expected to generate pollution at levels deemed unacceptable, thereby avoiding impact on the amenity of the area. Consequently, it is determined that the project is not a potentially offensive industry.

In summary, detailed assessment undertaken by appropriate technical specialists demonstrates that on balance the project is unlikely to have significant impact on the receiving environment. On this basis, the project is not considered to be contrary to the public interest.

The project has been assessed in accordance with the SEARs, current environmental legislation and regulatory requirements. Where necessary, appropriate management and mitigation measures have been identified to promote environmental conservation or minimise impact to the surrounding community.

5.20 Submission 20 (SE-75363973)

A public submission was received by DPHI from William Lovatt.

This is the most ludicrous proposal I have seen in my 45 years of operating a Port related transport company. From 1979, my company was located in Port Air Industrial Estate (1A Hale Street Botany) and since 2015 in Luland Street Botany. Therefore, I have witnessed the changes that opening Hale Street to Foreshore Road and closing Botany Road to heavy vehicles has made during this time.

The traffic volume that uses Hale Street as a route to get to the Eastern Suburbs has tripled in the last three years and this development will only add to the problems that already exist.

Some long-standing tenants of Port Air Industrial Estate include FEDEX, UPS, Star Track (Australia Post), PCFS, Coca Cola, Menzies Air freight Transport and Gibson Freight all use Heavy vehicles accessed by Foreshore Road, Hale Street and Luland Street.

Traffic generation arising from the project has been assessed having regard for the proposed site operations and will result in a net traffic generation reduction during both the morning and afternoon peak periods.

Notwithstanding, conservative SIDRA modelling has been undertaken for existing and future year (10 year horizon) scenarios demonstrating all key intersections will operate satisfactorily at LoS C or better, with spare capacity. As such, no external infrastructure improvements (intersection upgrades etc) are required from a transport planning perspective to accommodate the proposed development.

A queuing assessment has been provided as Section 9.8 in the TIA and concludes that all nominal queuing demands are expected to be satisfactorily accommodated entirely within the site under extremely conservative operational conditions, and the development is expected to operate satisfactorily without impacting the operation of Hale Street, or roadways further afield.

My other concerns are the materials that will be transferred through this development and the ramifications for over 1000 workers and their health, working in the immediate area, not to mention the houses in Bay Street that back onto the property and Botany Primary School which is in the immediate vicinity.

Section 3.4.7.1 of the EIS describes the incoming waste procedure and details prohibited waste types (non-exhaustive list), including asbestos, food waste, putrescible waste, liquid waste and other hazardous waste. Section 6.2.3 of the EIS includes the management strategies to

demonstrate how the facility will comply with EPA standards for managing construction waste in NSW (2018).

Section 6.9 of the EIS assesses the hazards and risks associated with the project and provides hazard management strategies that will be implemented. Section 6.9 concludes that hazardous materials and chemicals to be stored on site do not exceed the screening thresholds of Applying SEPP 33 and therefore does not fit the definition of 'potentially hazardous industry' or 'hazardous storage establishment'.

In addition, emissions related to air, noise and water from the construction and operation of the project have been assessed to determine if the project will fall under the category of a potentially offensive industry. The findings indicate that the project is not expected to generate pollution at levels deemed unacceptable, thereby avoiding impact on the amenity of the area. Consequently, it is determined that the project is not a potentially offensive industry.

In summary, detailed assessment undertaken by appropriate technical specialists demonstrates that on balance the project is unlikely to have significant impact on the receiving environment. On this basis, the project is not considered to be contrary to the public interest.

During summer we experience King tides, that result in flooding at the Luland Street/Hale Street roundabout with a foot of water and this could create pollution to the Bay and surrounding waterways with the operation of this development.

A flood impact assessment and integrated water management report were prepared and submitted with the EIS. Updated versions are attached as Appendix D and Appendix F respectively.

Section 10.4 of the flood impact assessment, updated and attached as Appendix D details containment of contamination in a flood event. Notable outcomes include:

- There is no putrescible waste or leachate present on this site.
- Chemicals are limited to a self-bunded diesel tank, and very small quantities of maintenance oils, grease and general cleaning chemicals will be stored in designated and bunded storage areas within the warehouse.
- The waste materials being sorted are primarily concrete, bricks, wood, plastic, paper, soil, and metal. All materials are contained within the building and building doors will be closed during a flood event preventing material from leaving the building. None of this material is conducive to floating or moving in low velocity flood waters. Therefore, the risk of "hazardous" or any other substances being released from the site in a flood event is very low and highly unlikely.
- The operations will be fully protected to 500 mm above the 1% AEP flood event.
- For events of greater intensity (i.e. probable maximum flood (PMF)) there is minimal storage of chemicals or hazardous materials onsite and as noted above there will be very low risk of contaminant release.

Traffic coming off Foreshore and over the pipeline into Hale street would be disastrous going both ways as it is only two lanes wide and NO room for error with large vehicles entering or leaving this site.

A crash data analysis has been undertaken in section 5.2 of the TIA (Appendix C) for the most recent five year period between 2019 and 2023 and reveal no clear indication of recurring crash themes nor indication of any existing underlying road safety issues.

The project has been assessed to result in a net reduction in the traffic generation potential of the site and is not expected to contribute to any notable change in relation to the number of crashes in the vicinity of the site.

I have discussed the proposal with Transport of NSW who have indicated that they would also object to this proposal. The traffic flow around Foreshore Road, General Holmes

Drive and Hale Street is a priority for movements of export and import containers to the Port precinct. A large increase in the traffic, such as stated in the proposal, would cause massive traffic problems to the public as well as transport companies and would increase the gridlock status and a huge problem for Transport of NSW.

TfNSW provided the following comment on the EIS submission: 'TfNSW has reviewed the submitted information and has no requirements as the proposed development is unlikely to have a significant impact on the classified road network.'

The only notice that we had on this proposal was by one of my workers obtaining a leaflet from a Botany shop and bringing it to my attention on Monday 26th August. As a main stakeholder in the precinct, we (and all Port Air Industrial Estate tenants) should have been informed well in advance of the closing date. Unfortunately, we were left only one week to lodge an objection to this development which in itself I find is controversial.

I employ over 50 staff (truck drivers, warehouse, admin and subcontractors), I was only able to petition them for half a day and attach that petition to my submission. There would have been more objections if we had more time to display it.

I am available to discuss any of our concerns in this objection which I believe is detrimental to this area. I hope commonsense prevails and you take into consideration all the objections to this project.

An engagement report including a community and engagement strategy was undertaken in accordance with Undertaking Engagement Guidelines for State Significant Projects (DPHI, 2024) and submitted with the EIS.

Determination of the community consultation catchment was detailed in Section 3 of the engagement report and was formed based on the terrain and surrounding infrastructure that influence potential impacts on the community, including Botany Road and General Holmes Drive (M1), Mill Stream, Mill Pond and Sir Joseph Banks Park.

Details of the engagement activities were provided in Section 3.3 of the engagement report.

The EIS was on exhibition on the Major Projects portal for the statutory minimum period of 28 days between 7 August – 3 September 2024.

5.21 Submission 21 (SE-75366710)

A public submission was received by DPHI. The contact details of the member of the public making the submission have been redacted.

A Waste Transfer Station at the bottom of Bay Street, Botany is inappropriate. It will create huge issues with traffic, pollution (noise/ toxic hazards/ smell/ water pollution to Botany Bay) located so close to residential/ educational areas. A more appropriate location is required as the industrial zone in this region shrinks.

The proposed operations are considered a valid and permissible development in the current land use zone.

Section 3.4.7.1 of the EIS describes the incoming waste procedure and details prohibited waste types (non-exhaustive list), including asbestos, food waste, putrescible waste, liquid waste and other hazardous waste. Section 6.2.3 of the EIS includes the management strategies to demonstrate how the facility will comply with EPA standards for managing construction waste in NSW (2018).

Section 6.9 of the EIS assesses the hazards and risks associated with the project and provides hazard management strategies that will be implemented. Section 6.9 concludes that hazardous

materials and chemicals to be stored on site do not exceed the screening thresholds of Applying SEPP 33 and therefore does not fit the definition of 'potentially hazardous industry' or 'hazardous storage establishment'.

In addition, emissions related to air, noise and water from the construction and operation of the project have been assessed to determine if the project will fall under the category of a potentially offensive industry. The findings indicate that the project is not expected to generate pollution at levels deemed unacceptable, thereby avoiding impact on the amenity of the area. Consequently, it is determined that the project is not a potentially offensive industry.

In summary, detailed assessment undertaken by appropriate technical specialists demonstrates that on balance the project is unlikely to have significant impact on the receiving environment. On this basis, the project is not considered to be contrary to the public interest.

The project has been assessed in accordance with the SEARs, current environmental legislation and regulatory requirements. Where necessary, appropriate management and mitigation measures have been identified to promote environmental conservation or minimise impact to the surrounding community.

5.22 Submission 22 (SE-75366765)

A public submission was received by DPHI. The contact details of the member of the public making the submission have been redacted.

I am writing to express my strong opposition to the proposed construction of a waste transfer station just meters away from my home and a nearby public school. While I understand the need for effective waste management infrastructure, the location chosen for this project is highly inappropriate and raises significant concerns for the health, safety, and well-being of our community.

The proximity of the proposed site to residential areas and a public school poses serious risks, including air and noise pollution, increased traffic congestion, and potential exposure to hazardous materials. These issues are particularly concerning for children, who are more vulnerable to the adverse effects of environmental pollutants. The potential decrease in property values is also a valid concern for homeowners like myself.

I urge you to reconsider the location of this facility and explore alternative sites that do not endanger the health and safety of residents or disrupt the daily lives of students and families. Our community deserves to be protected from such intrusive developments, and I trust that you will take our concerns into serious consideration.

Thank you for your attention to this critical matter.

The proposed operations are considered a valid and permissible development in the current land use zone.

Section 3.4.7.1 of the EIS describes the incoming waste procedure and details prohibited waste types (non-exhaustive list), including asbestos, food waste, putrescible waste, liquid waste and other hazardous waste. Section 6.2.3 of the EIS includes the management strategies to demonstrate how the facility will comply with EPA standards for managing construction waste in NSW (2018).

Section 6.9 of the EIS assesses the hazards and risks associated with the project and provides hazard management strategies that will be implemented. Section 6.9 concludes that hazardous materials and chemicals to be stored on site do not exceed the screening thresholds of Applying SEPP 33 and therefore does not fit the definition of 'potentially hazardous industry' or 'hazardous storage establishment'.

In addition, emissions related to air, noise and water from the construction and operation of the project have been assessed to determine if the project will fall under the category of a potentially offensive industry. The findings indicate that the project is not expected to generate pollution at levels deemed unacceptable, thereby avoiding impact on the amenity of the area. Consequently, it is determined that the project is not a potentially offensive industry.

In summary, detailed assessment undertaken by appropriate technical specialists demonstrates that on balance the project is unlikely to have significant impact on the receiving environment. On this basis, the project is not considered to be contrary to the public interest.

The project has been assessed in accordance with the SEARs, current environmental legislation and regulatory requirements. Where necessary, appropriate management and mitigation measures have been identified to promote environmental conservation or minimise impact to the surrounding community.

5.23 Submission 23 (SE-75367740)

A public submission was received by DPHI. The contact details of the member of the public making the submission have been redacted.

I am concerned about noise, pollution, potential hazardous materials pollution and increased traffic congestion from hale street onto foreshore road.

Detailed assessment undertaken by appropriate technical specialists on these risks demonstrates that on balance the project is unlikely to have significant impact on the receiving environment. On this basis, the project is not considered to be contrary to the public interest.

The project has been assessed in accordance with the SEARs, current environmental legislation and regulatory requirements. Where necessary, appropriate management and mitigation measures have been identified to promote environmental conservation or minimise impact to the surrounding community.

5.24 Submission 24 (SE-75369207)

A public submission was received by DPHI. The contact details of the member of the public making the submission have been redacted.

OBJECTION TO SSD-62855708 WASTE COLLECTION, TREATMENT & DISPOSAL FACILITY, 2-4 HALE ST, BOTANY.

My objections, in broad terms, that most seriously, the proposal involves a huge number of additional heavy vehicle movements in an already very congested section of road, and will lead to something I could only describe as chaos, in peak periods

There is huge potential for queueing problems, spilling out into Hale St which, should it happen with a single truck, would be devastating for existing road traffic.

the proposal is presented as for construction and demolition waste, but in fact is stated in the finer print of the EIS to potentially include a much broader range of waste materials

the proposal is for a facility significantly in conflict with all other businesses in the area

the site does not appear to be large enough to properly accommodate the proposed business, nor orderly entry and exit of trucks to and from the site

TRUCK MOVEMENTS AND IMPACT ON ADJACENT ROAD

Hale St is already very busy, especially during peak hours

While it is true that large articulated trucks to use Hale St, already, note that Hale St, particularly between the roundabout intersection with Luland St, and Foreshore Rd, is narrow, and includes a very narrow bridge near the latter.

This section of road is heavily congested during peak hours, and very busy during business hours on weekdays

Particularly, in the afternoon peak, for around 30 minutes, there is normally a stopped queue of traffic stretching from the traffic lights at Foreshore Rd, almost to Underwood St ie ~400m long.

Proposed truck movements represent a huge, and intolerable increase above already high traffic

Estimated truck movements are discussed on p38 of the EIS. Ie 412 truck movements per day, with 80% 7am to 6pm. Let's put that in a different way: every 2 minutes, 11 hours per day, a heavy truck, including B doubles will be either entering or exiting this site. That is A LOT of extra traffic.

Orderly entry and exit to the site does not appear feasible

The diagrams on pp 24 and 28 of the EIS make this fairly clear. Hale St is narrow. There is, in my estimation, little chance heavy rigid trucks, and definitely not articulated trucks, can turn left from Hale St, into such a facility. That involves making a ~135 deg hard turn, and there simply isn't enough space. If possible at all, these vehicles would have to swing onto the other side of the road to make the turn. That is completely unacceptable, 206 times per day, and possibly worse for the remaining 20% of movements, at night.

The diagram on p24 appears to suggest turning left from Hale St to enter, and turning right onto Hale St, to exit. I do not see that is workable.

Entering this way would also necessitate removal of the street parking which currently exists, and parking is already in short supply in this area.

Most likely, drivers arriving will likely choose to do a 180deg turn at the roundabout at Luland St, then a right turn across the oncoming traffic lane to enter, or exit left to the roundabout and do a 180deg turn to exit Hale St to the West. In my opinion, 406 such manoeuvres per day is unacceptable. Further, the road at that point is soft and unstable, as it is flooded with sea water twice a day during peak tides, and requires ongoing repair already, let alone with the stress of 406 U turns by heavy trucks per day.

This sort of entry / exit would be truly chaotic during heavy traffic periods as these vehicles would be blocking traffic even more that is already the case.

Note that the entry point proposed is, on its eastern edge, < 10m from the roundabout.

SUGGESTION: If this proposal is accepted, it should be stipulated that trucks are prohibited from doing 180 degree turns at the roundabout and the intersection with Luland St.

Queueing

Again, using EIS numbers, 168 arrivals per day. 80% during daytime hours = 134 arrivals. That is 12 per hour for 11 daytime hours. That is 5 minutes per truck allowable in this facility, to weigh, unload, and leave. I contend that is not possible.

Plus, at the same time, about 3 much bigger trucks arrive per hour, to remove the sorted waste. They will have to arrive, weigh, load and leave with 20 mins turnaround. Yet, when I look at the diagram on p24, it is hard to comprehend how that can work. There is plainly no room for passing or parking of trucks, so I foresee a serious queuing problem. When

that happens, I will lay money that some driver is going to stop in Hale St, waiting to enter the facility. That is going to cause utter chaos. Who will be on hand to prevent that?

PURPOSE OF THIS FACILITY IS AMBIGUOUS

The proposal continually refers to a 'construction and demolition waste', yet, the table on p23 of the EIS says it includes 'mixed waste (recyclable and otherwise), building and demolition waste, vegetation waste, timber and wood waste, cardboard, asphalt, and excavated natural materials'

PROPOSAL IS SIGNIFICANTLY IN CONFLICT WITH BUSINESSES IN THIS AREA

All businesses operating in Booralee St, Luland St, the relevant end of Hale St, and indeed nearby streets such as Underwood and Chegwyn St etc, are all light industrial in nature. There is not a single one which creates significant noise, dust, litter or much in the way of traffic, either cars or trucks.

Even the modest container terminal in the business park at the south end of Luland St, involves relatively few movements of heavy trucks.

Rather, they are typified by relatively small businesses which include automotive services, sheet metal work, warehousing, cabinetmaking etc.

These sorts of properties are in short supply in the area, and the loss of such business units at this site would be a bad outcome.

THE SITE APPEARS TO BE BARELY SUFFICIENT FOR SUCH A BUSINESSES

Looking at the diagram on p24, it is clear that this is not a big site, in the context of the proposed use.

I question the viability of offloading 1000 tonnes per day into such a compressed space. Using the numbers from the EIS, ~10 trucks per hour will be dropping of waste during daytime hours. So there will be 5 minutes per truck, to weigh, drop off, and exit. At the same time, another set of trucks are supposedly also arriving, loading and exiting with average 20 mins turnaround.

As noted earlier, there is obviously no scope for trucks passing in the same direction, in the proposed facility. They are all, whether dropping off, or leaving loaded, entering and exiting in a single line.

To me, this sounds highly unworkable. And utterly unrealistic. I see no way of scheduling arrivals and departures in any significant way, let alone in a manner which would allow the processing of 1000 tonnes of waste, per day, in such a confined space, in such a congested road context.

RE ATTACHED PHOTOS

***These are taken from the western edge of the roundabout, looking at the eastern end of the site.**

According to the EIS, trucks, including B Doubles, are (apparently) going to come from the Foreshore Rd (to the left in these photos, and make a left hand turn from Hale St into a driveway sited where this building currently stands, and exit by making a right hand turn onto Hale St.

***Given the near ~135deg turn (at least) that requires in a very tight space, I suggest that is a/ likely not possible for larger trucks, and b/ only possible for most of them if they swing across the centreline of the road before turning left.**

***As noted above, I can see many drivers making a U turn in the roundabout. I consider than unacceptable for potentially large number of truck movements.**

Traffic generation, queuing and parking

Traffic generation arising from the project has been assessed having regard for the proposed site operations and will result in a net traffic generation reduction during both the morning and afternoon peak periods.

Notwithstanding, conservative SIDRA modelling has been undertaken for existing and future year (10 year horizon) scenarios demonstrating all key intersections will operate satisfactorily at LoS C or better, with spare capacity. As such, no external infrastructure improvements (intersection upgrades etc) are required from a transport planning perspective to accommodate the proposed development.

A swept path analysis has been undertaken in the TIA (Appendix C), the largest design vehicle being a 26m B-double, demonstrates satisfactory ingress/egress in accordance with AS 2890.2 (2018).

A queuing analysis (Section 9.8 of Appendix C) has been undertaken in accordance with conventional queuing theory under extremely conservative operational conditions and reveal the site has been designed to satisfactorily accommodate the 98th percentile queue, and that it statistically improbable for any vehicles to queue beyond the site on Hale Street (less than 0.008%).

KLF has provided a breakdown of the operational process as summarised in Section 9.8 of the TIA,indicating the total dwell time for a heavy rigid vehicle on the site is less than seven minutes and the total dwell time of a B-double vehicle on site is approximately 10 minutes.

The queuing analysis was undertaken using the following conservative parameters:

- All vehicles have been assumed to comprise 25/26m B-doubles.
- All vehicles have been assumed to have an average dwell time of 10 minutes.
- The site has the capacity to accommodate up to seven 25/26m B-double vehicles at any one time (as demonstrated in the swept path analysis).

The site will operate in a sequential arrangement and as such the likelihood of vehicles needing to overtake another truck is statistically improbable.

B-doubles will not use the roundabout on Hale Street to exit or enter the site. B-doubles will only use the approved 26 m B-double routes as detailed in Section 6.4.3.3 in the EIS. Entry and exit to the site will be via General Holmes Drive and Foreshore Road.

A future operational plan of management will be implemented requiring all heavy vehicles to arrive/depart via General Holmes Drive (M1). This plan of management will specifically note that no heavy vehicles are to access the site from the east via Hale Street (east of Luland Street) or Luland Street. A “NO RIGHT TURN” sign will be installed opposite the commercial vehicle driveway facing westbound traffic on Hale Street. A “NO LEFT TURN” sign will be installed within the site on the exit side of the commercial vehicle driveway.

Loss of on-street parking has been further addressed in section 8.6 of the TIA (Appendix C).

The current development that is located at the site has a shortfall of 17 spaces which is expected to be contributing to the on-street car parking demand in the local area.

The proposed development makes provision for a total of 15 car parking spaces (comprising 11 staff spaces, which is the maximum number of full time equivalent (FTE) staff employed at the site, and four visitor spaces) in accordance with Council's post-lodgement requirements (see section 8.1.2 of Appendix C).

As the design of the project has demonstrated sufficient on-site parking to accommodate its maximum operational demands, it is expected that there will be a net reduction of up to 12 parking spaces in the on-street parking demand as a consequence of the development (i.e. existing car parking credit of 17 car spaces less the loss of 5 on-street car spaces).

Waste types

Waste types to be accepted at the facility are clearly defined in Section 3.4.3 of the EIS and quantified in Section 3.4.4. These waste types are typical of that which are received at a construction and demolition waste transfer facility.

Land use

The proposed operations are considered a valid and permissible development in the current land use zone and generally align with objectives set by Bayside LEP and SEPP (transport and Infrastructure) 2021.

5.25 Submission 25 (SE-75371482)

A public submission was received by DPHI. The contact details of the member of the public making the submission have been redacted

I object to the Waste Management Facility at Botany as an employee in the Botany region and understands the significant impacts it can have on the Botany community and employees of the area. This project will be determinantal to the Botany area both in traffic management and putting the neighbouring community at risk of being exposed to hazardous pollution.

It is very concerning that in the Planning Secretary's Environmental Assessment Requirements letter the EHG is currently considering their request to waive the requirement for a Biodiversity Development Assessment Report (BDAR) for the proposal. Given this proposal is for a Waste Management Facility a very through BDAR should be completed to accompany this proposal to ensure all the Biodiversity of the Botany region is protected as the soil and pollutants of the Waste Management Facility will have significant impacts to the area.

A request for a BDAR waiver was approved by DPHI on 1 December 2023 as summarised in Section 6.27 of the EIS. Approval of the waiver reflects the limited biodiversity values on the site due to previous industrial development.

On the basis of the information gathered from a site inspection and desktop assessment by a qualified ecologist, the thresholds for the biodiversity offsets scheme are not triggered and the project will not have the potential to result in significant impact to threatened communities, populations or species afforded protection under the BC Act or EPBC Act.

As committed to in Section 6.18 of the EIS, construction and operational environmental management plans will be prepared following approval of the project as nominated conditions or approval. The management plans will include construction/operational conditions and controls, environmental management and procedures to address specific environmental aspects, and prevent indirect impacts off-site inclusive of biodiversity values near to the site.

The construction of a Waste Management Facility with a capacity to process up to 300,000 tonnes per annum of construction and demolition waste will have a significant impact on the air quality of the protected airspace of Sydney Airport.

The NSW EPA specifically states poorly run waste management facilities can cause leachate, dust, offensive odours and noise. Poor waste disposal, especially of hazardous

wastes can result in harmful chemicals leaching into the soil, groundwater and surface water becoming a risk to human health and the environmental. An estimated 2 million tonnes of hazardous waste was generated in NSW in 2019/20. Asbestos and contaminated soils accounted for 72% of this, Source: Waste and Recycling | NSW State of the Environment

The dust from unloading waste at the Waste Management Facility can cause air pollution and can have a direct impact on the protected airspace of Sydney Airport.

In the Planning Secretary's Environmental Assessment Requirements letter it emphasises the importance of effective and genuine community consultation. A comprehensive open and transparent community consultation engagement process must be undertaken during the preparation of the EIS. The community must be provided a description of potential impacts which I don't believe has been achieved as limited if any community consultation has taken place especially in regards to the potential negative health, biodiversity, community and traffic impacts.

The Waste Management Facility proposed for Botany is expected to make hazardous particles airborne during the destruction and the operations of the Waste Management facility which is located in close proximity to workers, residents, Botany Public School (approx. 283 students) and St Bernards Catholic Primary School (approx. 236 students) and 11 Botany Childcare facilities.

The proposed operations are considered a valid and permissible development in the current land use zone.

Section 3.4.7.1 of the EIS describes the incoming waste procedure and details prohibited waste types (non-exhaustive list), including asbestos, food waste, putrescible waste, liquid waste and other hazardous waste. Section 6.2.3 of the EIS includes the management strategies to demonstrate how the facility will comply with EPA standards for managing construction waste in NSW (2018).

Section 6.9 of the EIS assesses the hazards and risks associated with the project and provides hazard management strategies that will be implemented. Section 6.9 concludes that hazardous materials and chemicals to be stored on site do not exceed the screening thresholds of Applying SEPP 33 and therefore does not fit the definition of 'potentially hazardous industry' or 'hazardous storage establishment'.

In addition, emissions related to air, noise and water from the construction and operation of the project have been assessed to determine if the project will fall under the category of a potentially offensive industry. The findings indicate that the project is not expected to generate pollution at levels deemed unacceptable, thereby avoiding impact on the amenity of the area. Consequently, it is determined that the project is not a potentially offensive industry.

In summary, detailed assessment undertaken by appropriate technical specialists demonstrates that on balance the project is unlikely to have significant impact on the receiving environment. On this basis, the project is not considered to be contrary to the public interest.

The project has been assessed in accordance with the SEARs, current environmental legislation and regulatory requirements. Where necessary, appropriate management and mitigation measures have been identified to promote environmental conservation or minimise impact to the surrounding community.

An AQIA was undertaken and submitted with the EIS (updated as Appendix L) which concludes that the construction and operational phases of the project will not result in any exceedances of the relevant air quality criteria at the surrounding receivers. It is considered that the implementation of the construction and operational phase mitigation methods and good site management practices potential air quality impacts associated with the project will be minimised.

An engagement report including a community and engagement strategy was undertaken in accordance with Undertaking Engagement Guidelines for State Significant Projects (DPHI, 2024) and submitted with the EIS.

Determination of the community consultation catchment was detailed in Section 3 of the engagement report and was formed based on the terrain and surrounding infrastructure that influence potential impacts on the community, including Botany Road and General Holmes Drive (M1), Mill Stream, Mill Pond and Sir Joseph Banks Park.

Details of the engagement activities were provided in Section 3.3 of the engagement report.

A social impact assessment was submitted with the EIS and has been updated as Appendix K.

The proposed location for this Waste Management Facility on 2-4 Hale Street, Botany will have significant impact on the congestion and traffic management in the Port Botany area having a significant negative impact on our Transport and Logistics industry in NSW being located so close to Foreshore road which is utilised by transport providers to access Port Botany for imports and export containers which is fundamental to our economic viability as a State. While construction is occuring and if there is any delays accessing the Waste Management Facility by trucks the traffic flow on effect will be that Hale Street will be blocked due to congestion and this will create congestion and traffic stoppages on Foreshore road. This will have significant impacts on the import and export industry which are required to meet set timeslots at the wharf for collecting imports and exporting containers. Significant delays and charges incurred by NSW Transport providers will contribute to the higher cost of living as transport providers will pass it on to the suppliers who will ultimately pass it on to the end user.

Congestion on Foreshore road caused by construction and potential queuing impacts creating traffic congestion and significant delays to access Hale Street due to the Waste Management Facility could create congestion on an already busy Southern Cross Drive impacting Sydney Airport directly as could cause significant delays for employees, pilots and Sydney Airport commuters to access the airport.

Traffic generation arising from the project has been assessed having regard for the proposed site operations and will result in a net traffic generation reduction during both the morning and afternoon peak periods.

Notwithstanding, conservative SIDRA modelling has been undertaken for existing and future year (10 year horizon) scenarios demonstrating all key intersections will operate satisfactorily at LoS C or better, with spare capacity. As such, no external infrastructure improvements (intersection upgrades etc) are required from a transport planning perspective to accommodate the proposed development.

A queuing assessment has been provided as Section 9.8 in the TIA and concludes that all nominal queuing demands are expected to be satisfactorily accommodated entirely within the site under extremely conservative operational conditions, and the development is expected to operate satisfactorily without impacting the operation of Hale Street, or roadways further afield.

Section 9.6 of the updated TIA (Appendix C) includes an assessment of construction impacts.

Construction traffic generation of approximately 124 vehicles per day is anticipated at the peak of the works, with 48 of these vehicles to be heavy vehicles and 76 light vehicles.

It is anticipated that a peak of 4 two-way truck movements may occur during a peak one hour period.

Given the anticipated construction traffic volumes being approximately a quarter (~23%) of the heavy vehicle trips expected to be generated by the development during operation, it is therefore

reasonable to conclude the surrounding road network can satisfactorily accommodate this volume of traffic.

A construction traffic and pedestrian management plan (CTPMP) was submitted with the EIS. The report addresses the existing conditions of the site, general overview of the construction program and traffic management arrangements which are proposed at this early stage. It should be noted that a comprehensive CTPMP will be prepared following approval of the project, once a builder has been appointed to the project and the exact construction methodology is determined.

As Hale Street is known to flood in the past creating a Waste Management Facility on Hale Street could have significant impacts on the water management strategy. Hale Street has proposed to have flood reduction facilities put in place to reduce the impact of flooding in Hale Street and the surrounding Botany areas as detailed in botany_bay_foreshore_beach_floodplain_risk_management_study_&_plan_version_e_part_b.pdf (nsw.gov.au) as it is a heavy flood zone.

This construction and operation of the Waste Management Facility will have significant negative impacts on the protected Biodiversity in the area located in Penrhyn Estuary and Foreshore Beach adjacent to Port Botany and situated close to Hale Street. These areas are home to a wide variety of native species including marine, migratory and shorebirds, mangroves and coastal saltmarsh and seagrasses. The construction of the Waste Management Facility will also have detrimental negative impacts on the partnership Bayside Council and NSW ports have are participating in to restore the biodiversity at Sir Joseph Banks Park a crucial natural refuge. Sir Joesph Banks Park a 16-hectare reserve in Botany Bay which contains some of the last remnants of the endangered Eastern Surburbs Banksia Scrub. It plays a vital role in providing habitats for a diverse range of native wildlife, including the Yellow-tailed black cockatoo, ringtail possum, dwarf tree frog and eastern long-necked turtle.

A flood impact assessment and integrated water management report were prepared and submitted with the EIS. Updated versions are attached as Appendix D and Appendix F respectively.

Section 10.4 of the flood impact assessment, updated and attached as Appendix D details containment of contamination in a flood event. Notable outcomes include:

- There is no putrescible waste or leachate present on this site.
- Chemicals are limited to a self-bunded diesel tank, and very small quantities of maintenance oils, grease and general cleaning chemicals will be stored in designated and bunded storage areas within the warehouse.
- The waste materials being sorted are primarily concrete, bricks, wood, plastic, paper, soil, and metal. All materials are contained within the building and building doors will be closed during a flood event preventing material from leaving the building. None of this material is conducive to floating or moving in low velocity flood waters. Therefore, the risk of “hazardous” or any other substances being released from the site in a flood event is very low and highly unlikely.
- The operations will be fully protected to 500 mm above the 1% AEP flood event.
- For events of greater intensity (i.e. probable maximum flood (PMF)) there is minimal storage of chemicals or hazardous materials onsite and as noted above there will be very low risk of contaminant release.

A request for a BDAR waiver was approved by DPHI on 1 December 2023 as summarised in Section 6.27 of the EIS.

On the basis of the information gathered from a site inspection and desktop assessment by a qualified ecologist, the thresholds for the biodiversity offsets scheme are not triggered and the

project will not have the potential to result in significant impact to threatened communities, populations or species afforded protection under the BC Act or EPBC Act.

As committed to in Section 6.18 of the EIS, construction and operational environmental management plans will be prepared following approval of the project as nominated conditions or approval. The management plans will include construction/operational conditions and controls, environmental management and procedures to address specific environmental aspects, and prevent indirect impacts off-site inclusive of biodiversity values near to the site.

With an estimated 168 inbound truck loads per day and 39 truck loads out this will have a significant impact on an already constrained roadway with Foreshore experiencing significant delays. As the proposed facility will accept B Doubles utilising the CML and HML permits as expressed in Table 5.2 Community feedback they can only enter and exit via Foreshore road which will create significant traffic congestion in an already very congested road. Unfortunately past the site as well there is only a small round about of which I have been witness to many accidents and near misses. With increasing the trucks that will be coming into the area this will create more danger and risk to the other patrons of the road. While the sheer volume of trucks entering and exiting the waste management site will put constraints on the already congested roadways it will be so much worse and have catastrophic impacts to both Foreshore road and Southern Cross drive if there was a queue or accident near to or in the facility. The congestion would be outreaching leading onto Hale Street, Foreshore and Southern Cross drive negatively impacting the transport industry and also commuters for the airport/aviation industry. It would be gridlock as we cannot divert trucks onto Botany Road as per the Feedback with the B Doubles utilsing HML and CML permits for accessing the Waste Management Facility can only use Foreshore Road and not leave Hale Street via Botany Road.

Thank you very much for your consideration of my objection. Please do not let this project go ahead as it will have significant negative repercussions for the traffic flow, airport, soil and Botany's Biodiversity.

B-doubles will not use the roundabout on Hale Street to exit or enter the site. B-doubles will use the approved 26 m B-double routes only as detailed in section 6.4.3.3 in the EIS. Entry and exit to the site will be via General Holmes Drive and Foreshore Road.

A crash data analysis has been undertaken in Section 5.2 of the TIA (Appendix C) for the most recent five year period between 2019 and 2023 and reveal no clear indication of recurring crash themes nor indicate any existing underlying road safety issues.

The proposed development will result in a net reduction in the traffic generation potential of the site and is not expected to contribute to any notable change in relation to the number of crashes in the vicinity of the site.

5.26 Submission 26 (SE-75374457)

A public submission was received by DPHI from Jonathan Abatte.

Regards...

I object to this project because it is too close to the residential area. This poses a threat to the health of our community and it is of utmost importance that this project be stopped immediately.

Thank you for your attention

The proposed operations are considered a valid and permissible development in the current land use zone.

Detailed assessment undertaken by appropriate technical specialists demonstrates that on balance the project is unlikely to have significant impact on the receiving environment. On this basis, the project is not considered to be contrary to the public interest.

The project has been assessed in accordance with the SEARs, current environmental legislation and regulatory requirements. Where necessary, appropriate management and mitigation measures have been identified to promote environmental conservation or minimise impact to the surrounding community.

5.27 Submission 27 (SE-75415717)

A public submission was received by DPHI from SJB Planning.

Re: Submission to SSD-62855708 – Botany Waste Management Facility – 2-4 Hale Street, Botany NSW 2019

Dear Sally,

We refer to State Significant Development SSD-62855708 which proposes a new Waste Management Facility including the following:

- **Demolition of existing structures;**
- **Construction of a new purpose-built warehouse of 3,647m2 for the receipt, basic sorting and recycling with aggregation of material;**

We act on behalf of the owners of the following sites:

- **CHEM SITE PTY LTD (CAN 128 730 941) – owner of 13-15 Hale St Botany**
- **CHEM SITE PTY LTD (CAN 128 730 941) – owner of 19-21 Hale St Botany**
- **LULAND INVESTMENTS PTY LTD (CAN 105 116 270) - owner of 115 & 23 Luland St Botany**
- **LULAND INVESTMENTS PTY LTD (CAN 105 116 270) - owner of 25 Luland St Botany**
- **HALE ST HOLDINGS PTY LTD (CAN 600 108 209) – owner of 23 Hale St Botany**

We write to object to the proposed SSD. Our key concerns relate to the potential adverse traffic and parking impacts associated with the proposed waste management facility.

In particular we note that the proposed development will generate significant truck movements to and from the site on a 24 hour basis, all year round.

The truck movements will include articulated vehicles up to and including 26 metre B-doubles, truck and dog trailers up to 19.6 metres long and single rigid trucks up to and including 12.5m Heavy Rigid Vehicles (HRV).

The Traffic Impact Assessment (TIA) prepared by TRAFFIX (submitted with the SSD) states anticipated truck volumes for the development as follows:

- **Articulated Vehicles up to 26m B-doubles and Truck and Dogs up to 19.6m:**
  - **94 vehicle trips per day(47 in, 47 out).**
- **Rigid Vehicles up to 12.5m:**
  - **318 vehicle trips per day (159 in, 159 out).**
- **Combined:**
  - **412 vehicle trips per day (206 in, 206 out).**

The TIA states that:

"Heavy vehicle movement are split between the day/nighttime periods with 80% of trucks arriving between 7am-6pm and 20% between 6pm-7am, with the following truck volumes expected during road network peak periods:

- **Articulated Vehicles up to 26m B-doubles and Truck and Dogs up to 19.6m:**
  - **8 vehicle trips per hour (4 in, 4 out).**
- **Rigid Vehicles up to 12.5m:**
  - **24 vehicle trips per hour (12 in, 12 out).**
- **Combined:**
  - **32 vehicle trips per hour (I 6 in, 16 out)."**

The above truck movements do not include small vehicles trip generation at the site which will be additional and is stated in Part 6.11 of the TIA as:

- **"54 vehicle trips per day (27 in, 27 out); and**
- **54 vehicle trips per day (27 in, 27 out)."**

It is unclear if the second line of the above is a typographical error.

Traffic generation for the project has been updated in Section 9.2 of the updated TIA (Appendix C.

Section 9.2.5 of the TIA includes the cumulative trip generation includes both heavy vehicle trips and staff trip generation (light vehicles),with 37 vehicle trips per hour during the morning peak period and 37 vehicle trips per hour during the afternoon peak period.

The TIA indicates that all trucks entering the site will be via a left turn into the site from Hale Street and that all trucks departing the site will be via a right turn from the site into Hale Street. That is, no trucks will depart the site in an eastward direction along Hale Street and that all trucks will enter and depart the site along Hale Street to or from Foreshore Road.

The conclusions of the TIA (under Section 10) based upon the above heavy vehicle distribution scenario is as follows:

"Traffic generation arising from the proposal has been assessed having regard for the proposed site operations as discussed in Section 8.2. In terms of the overall network performance arising from the proposed development, all intersections operate satisfactorily at Los A with spare capacity under both the Base Case (2023) and Base Case+ Development scenarios. No external infrastructure improvements (intersection upgrades etc.) are required are required in this regard."

Our review of the TIA raises the following specific concerns:

There does not appear to have been any detailed analysis undertaken as to the safety of heavy vehicles entering and exiting the site (i.e. 412 times a day) having regard to the complex existing circumstances of the immediate road network including the following aspects:

- **The western edge of the proposed truck entry and exit driveway is approximately 40m away from a significant rise in the road level of Hale Street to the west - vehicles will be accelerating down the slope towards the site;**
- **The eastern edge of the proposed truck entry and exit point appears to be approximately only 15m from the roundabout intersection of Luland Street and Hale Street;**
- **The proposed truck driveway is opposite an existing driveway at 12 Luland Street and is diagonally opposite two more driveways at 270-29 Hale Stret and 31 Hale Street;**
- **The swept path analysis appears to indicate truck movements over the on-street**

parking spaces on the southern side of Hale Street, opposite the subject site.

Updated traffic modelling has been undertaken in Section 9 of the TIA (Appendix C) demonstrating the proposed site access driveways will operate satisfactorily

The proposed position of the driveway has been satisfactorily designed in accordance with AS 2890.1 (2004) and AS 2890.2 (2018) and will operate safely and efficiently.

The driveway has been strategically positioned to satisfy site operational requirements and is located as far practicable from Foreshore Road being the critical classified road.

Vehicles must reduce their speed to an appropriate and safe level when making a turn to maintain control and ensure the safety of all road users, especially in the context of large heavy vehicles. In this regard, vehicles slowing down on approach to the roundabout is favourable in the circumstance.

Detailed SIDRA modelling results are discussed in Section 9.5 of the updated TIA (Appendix C). SIDRA movement summary output identifies a maximum 95th percentile queue of 22.1 m during road network peak periods under existing plus development scenarios, and a maximum 95th percentile queue of 31.1 m during road network peak periods under future (10 year horizon) plus development scenarios.

The proposed site egress driveway being positioned approximately 32 m away from the Luland Street west approach to the roundabout and will therefore not have any interaction with the 95th percentile queue and will operate safely and efficiently.

Swept path analysis have been updated with recent Nearmap aerial georeferenced in the background clearly demonstrating 26m B-double vehicles will be able to ingress and egress the site satisfactorily in accordance with AS 2890.2 (2018).

- **It is not clear how the expected 412 truck movements per day have been calculated- the analysis in the TIA is based on this assumption and therefore it should be explained in detail. Assessment does not appear to have been undertaken for a scenario whereby more truck movements could occur.**
- **The basis of the assumed heavy vehicle movement split between the day/nighttime periods (with 80% of trucks arriving between 7am-6pm and 20% between 6pm-7am) is not clear.**

Section 9 of the TIA has been updated to provide detailed calculations on how the anticipated heavy vehicle trip generation associated with the project has been estimated including a breakdown of the vehicle types.

The proposed queuing arrangements appear to be reliant upon management by on-site staff - if so how will this be undertaken and what happens if more than 5 heavy vehicles arrive at the site at any given time (given the site has a queuing capacity for 5 heavy vehicles only)?

In the event that more trucks arrive at the site and there is insufficient queue space on site, what will be the path that heavy vehicles take within the local road network to enable them to circle and return to access the site?

Of particular concern is the impact to the local road network in the situation that independent truck operators/contractors (driving 26m to 19m long heavy vehicles) enter Hale Street from the west (as set out in the TIA) and are then unable to enter the site in peak periods.

In such a situation it is unclear where trucks will go or where they wait. Presumably they will be forced to head east along Hale Street past the site. In this regard it is noted that there is restricted vehicle access to Botany Road from Hale Street - therefore large heavy

vehicles will presumably need to use the round-about intersection at Hale Street and Luland Street and or attempt U turns somewhere in Hale Street and or Luland Street.

It is unclear if that is physically possible, and no detailed analysis has been undertaken of this scenario. It is considered that such a situation is likely to have an unsafe and significant adverse impact on the functioning of surrounding road network.

In considering the above matters, it is unclear from the information provided in the application what the proposed method of coordination and enforcement of the proposed traffic and parking procedures will be for the day-to-day operations of the facility.

It is unclear how the arrival and departure arrangements for heavy vehicles will be managed - such that, what will prevent heavy vehicles from arriving at the site from the east or departing in an eastward direction?

While heavy vehicle trip numbers and distribution routes are outlined in the TIA, it is unclear how these arrangements and movements will be enforced and managed on an hourly and daily basis.

It is unclear what will happen if the stated number of heavy vehicle trips (412 vehicle trips per day) are exceeded, that is, how will the operator maintain the proposed truck movements to the level that has been stated and assessed in the TIA, and how will the operator reduce truck movements in the event that additional trucks seek to use the facility.

In summary there does not appear to be a detailed explanation of the required management processes to coordinate the 412 truck movements and the 54 smaller vehicle movements each day and to ensure that they use the proposed distribution routes. Nor does there appear to be identified mitigation measures proposed if additional heavy vehicle truck movements occur and or the circumstances eventuate that there is insufficient queuing space at the facility.

An updated TIA has been provided in Appendix C which addresses all of Council's comments following the submission of the EIS, and similarly address community concerns.

A future operational plan of management will be implemented requiring all heavy vehicles to arrive/depart via General Holmes Drive (M1). This plan of management will specifically note that no heavy vehicles are to access the site from the east via Hale Street (east of Luland Street) or Luland Street. A “NO RIGHT TURN” sign will be installed opposite the commercial vehicle driveway facing westbound traffic on Hale Street. A “NO LEFT TURN” sign will be installed within the site on the exit side of the commercial vehicle driveway.

A queuing assessment has been provided as section 9.8 in the TIA and concludes that all nominal queuing demands are expected to be satisfactorily accommodated entirely within the site under extremely conservative operational conditions, and the development is expected to operate satisfactorily without impacting the operation of Hale Street.

The queuing analysis (Section 9.8 of Appendix C) has been undertaken in accordance with conventional queuing theory under extremely conservative operational conditions and reveal the site has been designed to satisfactorily accommodate the 98th percentile queue, and that it statistically improbable for any vehicles to queue beyond the site on Hale Street (less than 0.008%).

KLF has provided a breakdown of the operational process as summarised in Section 9.8 of the TIA (Appendix C) indicating the total dwell time for a HRV on site is less than seven minutes and the total dwell time of a B-double vehicle on site is approximately 10 minutes.

The queuing analysis was undertaken using the following conservative parameters:

- All vehicles have been assumed to comprise 25/26m B-doubles.
- All vehicles have been assumed to have an average dwell time of 10 minutes.
- The site has the capacity to accommodate up to seven 25/26m B-double vehicles at any one time as demonstrated in the swept path analysis.

The site will operate in a sequential arrangement under which the likelihood of vehicles needing to overtake another truck is statistically improbable.

Council DCP requirements indicate that a parking (and not just a traffic) survey should be undertaken. A detailed parking study does not appear to have been undertaken and therefore the impact of the loss of at least 5 on-street car spaces to accommodate the proposed development have not been assessed thoroughly.

We are informed that on-street car parking is often fully utilised - it is unclear therefore what provisions will be made, if any, for the net loss of valuable on-street car parking which benefits the wider industrial zone.

In addition there appears to be the circumstance that additional on-street car parking spaces will be affected by the heavy vehicle truck swept paths entering and departing the site and this should be clarified.

Loss of on-street parking has been further addressed in section 8.6 of the TIA (Appendix C).

The current development that is located at the site has a shortfall of 17 spaces which is expected to be contributing to the on-street car parking demand in the local area.

The proposed development makes provision for a total of 15 car parking spaces (comprising 11 staff spaces, which is the maximum number of full time equivalent (FTE) staff employed at the site, and four visitor spaces) in accordance with Council's post-lodgement requirements (see Section 8.1.2 of Appendix C).

As the design of the project has demonstrated sufficient on-site parking to accommodate its maximum operational demands, it is expected that there will be a net reduction of up to 12 parking spaces in the on-street parking demand as a consequence of the development (i.e. existing car parking credit of 17 car spaces less the loss of 5 on-street car spaces).

Please see updated swept path analysis comment above.

The TIA's assessment and conclusions are based upon a specific number of truck movements per day and a singular, specific vehicle distribution route for all heavy vehicles. The TIA and the EIS do not examine or assess alternative scenarios or the impact upon the local road network if those arrangements are not adhered to.

Further, there is a lack of detail as to how the specific trucks movements numbers and identified distribution route will be enforced or managed to ensure that the identified numbers and route is adhered to.

It is considered that further information and clarification with regard to the above matters is required in order to be able to confidently and thoroughly assess and determine the true impacts of the proposed heavy vehicle truck movements that would be generated by the proposed development.

From the information provided it is not clear that the proposal will not have significant adverse impacts upon the safe operation of the local road network. It is also noted that the proposal will result in a significant reduction in on-street car parking (i.e. at least 5 car spaces) within the area and there has been no detailed assessment of the impact of the loss of on-street car parking.

We trust that the Department will consider our objection with the proposed development and seek clarification as to the matters raised and revert to us.

Should you require any further information, please do not hesitate to contact myself on (02) 9380 9911 or by email at sgordon@sjb.com.au.

Yours sincerely

Stuart Gordon Associate

See response above.

5.28 Submission 28 (SE-75421957)

A public submission was received by DPHI. The contact details of the member of the public making the submission have been redacted

Botany is already a congested suburb - adding more traffic by way of trucks transporting waste materials to an already busy area without proper infrastructure will cause further pressure. The waste transfer station will be in a high density residential area so any hazardous materials are a major concern as well.

The proposed operations are considered a valid and permissible development in the current land use zone.

Detailed assessment undertaken by appropriate technical specialists demonstrates that on balance the project is unlikely to have significant impact on the receiving environment. On this basis, the project is not considered to be contrary to the public interest.

The project has been assessed in accordance with the SEARs, current environmental legislation and regulatory requirements. Where necessary, appropriate management and mitigation measures have been identified to promote environmental conservation or minimise impact to the surrounding community.

5.29 Submission 29 SE-75422990

A public submission was received from Guy Smith at Goodman was received by DPHI.

This public submission has been addressed by Traffix in a letter attached as Appendix O.

CHAPTER 6

UPDATED PROJECT JUSTIFICATION

6 UPDATED PROJECT JUSTIFICATION

The project will play an important role in capturing and sorting waste in the southern Sydney region so that it can be aggregated on to higher mass vehicles for efficient transport to advanced resource recovery facilities. These facilities have the technology and capacity to achieve high rates of resource recovery but are dependent on waste transfer stations such as the project to capture and transfer waste in a way that minimises costs, overall traffic volumes and environmental and social impacts.

The project remains as described in the EIS, with the exception of some minor refinements made to the site layout plans, in response submissions raised by the various government agencies.

CPG has amended the design of the site to push the cantilevered office back into the warehouse building's footprint on the second floor to allow for the two additional car parking spaces outside. In doing so, there are now three car parking spaces perpendicular to the car entry/exit on the eastern side.

Additional clarification has been provided in relation to submissions received on traffic and access, flood risk, surface water, landscaping, noise and vibration, social impact, air quality, and soils and contamination.

Where required, additional environmental impact assessment was carried out in response to received submissions.

The revised assessments considered the refinements to the project outlined above, where relevant, and are included as appendices to this report.

The site is located in an industrial area with other industrial development and waste management and recycling facilities nearby and is adequately separated from sensitive land uses. Potential conflicts with the neighbouring Sydney Airport have been addressed through site layout, design and management strategies developed in response to consultation with Sydney Airport, CASA and Airservices Australia.

Development of the site layout, building design and operational strategy has sought to avoid and minimise impacts, including:

- Reducing the heights of the western part of the waste transfer station building to avoid interference with aviation protected airspace.
- A commitment to treat the design of the western façade to avoid impacts on airport communications systems, subject to the outcome of a test flight to determine actual impacts.
- Remediation of site contamination to make the site suitable for its intended use and any future uses where required.
- A fully enclosed building to minimise the impact of waste operations on the amenity of surrounding areas.
- Site layout design for optimal operation efficiency, particularly for the incoming and outgoing truck movements to minimise traffic impacts on Hale Street.
- Initiatives to reduce energy and water consumption, as well as use of material with a lower environmental impact.

The EIS, this submissions report and technical investigations have concluded that with the implementation of proposed design, environmental management and mitigation measures, the project will not significantly impact the local biophysical and social environments.

Based upon the predicted environmental impacts of the project and the ability to manage these impacts to minimise harm to the environment, the project is unlikely to create any significant

adverse environmental impacts on adjoining properties or prejudice the future use of land in the locality.

Given the need for the proposed development, suitability of the site, consistency with plans and policies and minor environmental impacts, the project is in the public interest and is recommended for approval.

CHAPTER 7

REFERENCES

7 REFERENCES

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APPENDIX A

PUBLIC SUBMISSIONS TABLE

Submission ID	Category	Sub-category	Comment	Response
SE-74771212	Traffic	Truck route	Vehicle movements is noted at 34 large/heavy truck per hour. The trucks are required to enter & exit the proposed driveway in a forward direction (EIS section 2.6). When following the Truck Routes listed in EIS 6.4.3.3, every truck will be required to enter the roundabout at the corner of Hale and Luland Street Botany to perform a 360 degree turn, then enter the property across oncoming traffic. The roundabout is not large enough to support a B-Double truck to perform a 360 degree turn and is only barely large enough to support semi-trailers. Currently many semi-trailers attempting a 360 degree turn at the roundabout end up reversing a number of times (holding up traffic, causing traffic congestion, unsafe manoeuvres and near accidents) and as a result some damage the drain, kerb and gutter which has been repaired numerous times.	The truck routes aim to avoid residential areas and direct trucks to and from the M1 minimising impacts in the area. B-doubles will not use the roundabout on Hale Street to exit or enter the site. B-doubles will only use approved 26 m B-double routes as detailed in Section 6.4.3.3 in the EIS. Entry and exit to the site will be via General Holmes Drive and Foreshore Road.
SE-75314723			If my presumptions are correct and a majority of the truck movements will be by Foreshore Rd, I will be happy to support this project.	
SE-75354708			1 single truck accident or breakdown will prevent complete access over the bridge which will then force trucks to use alternate routes through botany shops. These trucks could be carrying asbestos or hazardous materials and containment cannot be guaranteed.	
SE-75371482			With an estimated 168 inbound truck loads per day and 39 truck loads out this will have a significant impact on an already constrained roadway with Foreshore experiencing significant delays. As the proposed facility will accept B Doubles utilising the CML and HML permits as expressed in Table 5.2 Community feedback they can only enter and exit via Foreshore road which will create significant traffic congestion in an already very congested road. Unfortunately past the site as well there is only a small round about of which I have been witness to many accidents and near misses. With increasing the trucks that will be coming into the area this will create more danger and risk to the other patrons of the road. While the sheer volume of trucks entering and exiting the waste management site will put constraints on the already congested roadways it will be so much worse and have catastrophic impacts to both Foreshore road and Southern Cross drive if there was a queue or accident near to or in the facility. The congestion would be outreaching leading onto Hale Street, Foreshore and Southern Cross drive negatively impacting the transport industry and also commuters for the airport/aviation industry. It would be gridlock as we cannot divert trucks onto Botany Road as	

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			per the Feedback with the B Doubles utilsing HML and CML permits for accessing the Waste Management Facility can only use Foreshore Road and not leave Hale Street via Botany Road.	
SE-74771212	Traffic	Truck route	The additional traffic from the proposed Truck Movements (EIS 6.4.3.1) is also an issue, as at current peak traffic times, there is already congestion. A real-world test should be conducted with a representation of proposed truck sizes performing 34 movements an hour undertaking the 360 degree roundabout manoeuvre at peak traffic times to determine the results.	360-degree roundabout manoeuvres will not occur. SIDRA intersection analysis has been undertaken utilising traffic surveys and predicted truck numbers, in addition to a cumulative impact assessment detailed in Section 9 of the TIA.
SE-75369207			Most likely, drivers arriving will likely choose to do a 180deg turn at the roundabout at Luland St, then a right turn across the oncoming traffic lane to enter, or exit left to the roundabout and do a 180deg turn to exit Hale St to the West. In my opinion, 406 such manoeuvres per day is unacceptable. Further, the road at that point is soft and unstable, as it is flooded with sea water twice a day during peak tides, and requires ongoing repair already, let alone with the stress of 406 U turns by heavy trucks per day. This sort of entry / exit would be truly chaotic during heavy traffic periods as these vehicles would be blocking traffic even more that is already the case. Note that the entry point proposed is, on its eastern edge, < 10m from the roundabout. SUGGESTION: If this proposal is accepted, it should be stipulated that trucks are prohibited from doing 180deg turns at the roundabout and the intersection with Luland St.	
SE-74771212	Traffic	Traffic generation	The additional traffic from the proposed Truck Movements (EIS 6.4.3.1) is also an issue, as at current peak traffic times, there is already congestion. A real-world test should be conducted with a representation of proposed truck sizes performing 34 movements an hour undertaking the 360 degree roundabout manoeuvre at peak traffic times to determine the results.	A TIA has been submitted with the EIS and an updated version is provided as Appendix C. Traffic generation arising from the project has been assessed having regard for the proposed site operations and results in a net traffic generation reduction during both the morning and afternoon peak periods. Notwithstanding, conservative SIDRA modelling has been undertaken for existing and future year (10 year horizon) scenarios demonstrating all key intersections will operate satisfactorily at LoS C or better with spare capacity. As such, no external

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				infrastructure improvements (intersection upgrades etc) are required from a transport planning perspective to accommodate the project. It is also noted that the TIA has been reviewed by TfNSW with no comment received
SE-74957228			The traffic in Botany is already a nightmare. This particular bottle neck at the bottom of Hale street in the mornings and afternoons will be made far worse with up to 200 truck movements a day. These trucks will be lining up waiting and blocking the road as access is inadequate. I cannot see in any reasonable terms that this much traffic directed into a small area can work.	
SE-75021478			The proposed facilitys capacity is going to generate a substantial increase in traffic, particularly on Hale Street and Foreshore Road. Hale Street is already heavily congested with heavy vehicles, and adding more traffic from waste management operations will exacerbate the situation, leading to increased risk of accidents.	
SE-75022457			Hale street is already banked up at certain times and can not handle existing traffic let alone what is proposed trucks every 2 min. While Erith street is zoned business it still contains many residential properties and this proposal will have adverse affects on all of the residents.	
SE-75292458			Obviously, the majority of the vehicles going to this facility would be during the normal working day therefore it would place an excessive amount of extra vehicles entering and leaving Foreshore Rd. Hale St is a single lane road as it comes off of Foreshore Rd and already carries a large amount of traffic especially in peak hours I do not consider this facility appropriate for 2 - 4 Hale St Botany for the following reasons 1) should there be the slightest little hiccup at the junction of this facility traffic on Foreshore Rd could be brought to a standstill. Vehicles over a 6 ton are not allowed through Botany so the only way vehicles when exiting this proposed facility can go when coming out of the site is to turn right on to a single lane bridge toward Foreshore Rd and in peak hours this would be virtually impossible. Regards smaller vehicles that could turn left this then puts extra traffic along Underwood Rd and they then have to turn right into Bay Street which in peak hours is already at capacity also where there is a primary school	

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			The docks have been extended causing extra traffic with trucks already queuing along Foreshore Rd waiting to get into the site.	
SE-75302707			I am primarily concerned by the extra traffic the proposal will generate in both Hale street and adjoining streets which are already struggling with heavy traffic; frequently causing extensive traffic delays. Attached please find a petition signed by eighteen affected businesses AND four photographs that illustrate our point. Thank you for considering our submission	
SE-75304712			Traffic congestion. I see no Impact statement on the traffic on Hale Street and surrounding streets, only the main arterial roads or parking on Hale Street. Therefore, you should be made aware of the following traffic issues that we face every day. The traffic turning into Foreshore during peak times is banked back through the airport tunnel on General Holmes Drive, then negotiating with other traffic to turn into Hale street is also difficult most days. At the end of the day, the traffic is banked back to Botany Road from the traffic lights at Foreshore Road. This traffic continues through to M5 and back through Foreshore road. I have also noticed the impact that congestion on Hale street has on trucks turning right from Foreshore (from the port district), this could cause significant delays and severely impact deliveries to and from the wharves. The overpass on Hale Street is very narrow, considering the number of truck movements that are envisaged. 206 combined inbound/outbound deliveries per day would cause extreme traffic congestion on our already congested street and an accident or stoppage at the facility, would potentially result in gridlock. Trucks cannot divert along Botany Road, there is only one access to Luland street and the Port Air Industrial Estate where numerous truck deliveries are made throughout the day.	
SE-75314723			I have noted the entrance to the proposed Waste Management Plant is to be by Hale St and Foreshore Rd, and the large number of trucks coming in and out each 24 hours. My home is on Botany Rd, very close to the traffic lights at Hale St where the trucks would turn in and out. Apart from the Botany Shopping centre, this part of Botany Rd is very residential. It seems sensible	

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			that the major entrance and exit point would be by Foreshore Rd. There are no homes in this area, noise at any time would not annoy any residents.	
SE-75356711			Traffic and Safety Concerns: The introduction of another waste management facility would significantly increase the volume of heavy vehicles and trucks accessing local roads, exacerbating existing traffic congestion and posing a serious safety risk to pedestrians, cyclists, and drivers. The current road infrastructure is not equipped to handle this heightened traffic flow, which would likely result in increased accidents, noise pollution, and disruptions to the daily lives of local residents. The safety of children walking to and from Botany Public School would be particularly compromised.	
SE-75361995			We live at very close proximity to the proposed Waste Management Facility and our 7 year old son attends the public school that is also neighbouring the site, and thus would also be negatively affected by this facility, and we feel great distress around this proposal! We're gravely concerned about the hazardous materials that would be dealt with their, the pollution caused by the waste as well as the large amount of vehicles that would be coming in and out of the facility and suburb daily, by the currently contaminated materials there being disturbed and circulated in the air and nearby waterworks, the noise, smells, traffic. Not only would residents nearby be affected but the WHOLE community through the children attending the school being exposed, and the suburb and nearby areas with all the increased traffic and particles carrying over. Botany Public School, Mill Ponds, residents need to be considered and this project needs to be rejected! We need to think about the population and children and the long term effects of these decisions!	
SE-75363973			This is the most ludicrous proposal I have seen in my 45 years of operating a Port related transport company. From 1979, my company was located in Port Air Industrial Estate (1A Hale Street Botany) and since 2015 in Luland Street Botany. Therefore, I have witnessed the changes that opening Hale Street to Foreshore Road and closing Botany Road to heavy vehicles has made during this time. The traffic volume that uses Hale Street as a route to get to the Eastern Suburbs has tripled in the last three years and this development will only add to the problems that already exist. Some long-standing tenants of Port Air Industrial Estate include FEDEX, UPS, Star Track (Australia Post), PCFS, Coca Cola, Menzies Air freight Transport	

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			and Gibson Freight all use Heavy vehicles accessed by Foreshore Road, Hale Street and Luland Street.	
SE-75366710			A Waste Transfer Station at the bottom of Bay Street, Botany is inappropriate. It will create huge issues with traffic, pollution (noise/ toxic hazards/ smell/ water pollution to Botany Bay) located so close to residential/ educational areas. A more appropriate location is required as the industrial zone in this region shrinks.	
SE-75366765			The proximity of the proposed site to residential areas and a public school poses serious risks, including air and noise pollution, increased traffic congestion, and potential exposure to hazardous materials. These issues are particularly concerning for children, who are more vulnerable to the adverse effects of environmental pollutants. The potential decrease in property values is also a valid concern for homeowners like myself.	
SE-75367740			I am concerned about noise, pollution, potential hazardous materials pollution and increased traffic congestion from hale street onto foreshore road.	
SE-75369207			My objections, in broad terms, that most seriously, the proposal involves a huge number of additional heavy vehicle movements in an already very congested section of road, and will lead to something I could only describe as chaos, in peak periods While it is true that large articulated trucks to use Hale St, already, note that Hale St, particularly between the roundabout intersection with Luland St, and Foreshore Rd, is narrow, and includes a very narrow bridge near the latter. This section of road is heavily congested during peak hours, and very busy during business hours on weekdays Particularly, in the afternoon peak, for around 30 minutes, there is normally a stopped queue of traffic stretching from the traffic lights at Foreshore Rd, almost to Underwood St ie ~400m long. Proposed truck movements represent a huge, and intolerable increase above already high traffic Estimated truck movements are discussed on p38 of the EIS. Ie 412 truck movements per day, with 80% 7am to 6pm. Let's put that in a different way: every 2 minutes, 11 hours per day, a heavy truck, including B doubles will be either entering or exiting this site. That is A LOT of extra traffic.	
SE-75371482			The proposed location for this Waste Management Facility on 2-4 Hale Street, Botany will have significant impact on the congestion and traffic management	

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			in the Port Botany area having a significant negative impact on our Transport and Logistics industry in NSW being located so close to Foreshore road which is utilised by transport providers to access Port Botany for imports and export containers which is fundamental to our economic viability as a State. While construction is occurring and if there is any delays accessing the Waste Management Facility by trucks the traffic flow on effect will be that Hale Street will be blocked due to congestion and this will create congestion and traffic stoppages on Foreshore road. This will have significant impacts on the import and export industry which are required to meet set timeslots at the wharf for collecting imports and exporting containers. Significant delays and charges incurred by NSW Transport providers will contribute to the higher cost of living as transport providers will pass it on to the suppliers who will ultimately pass it on to the end user. Congestion on Foreshore road caused by construction and potential queuing impacts creating traffic congestion and significant delays to access Hale Street due to the Waste Management Facility could create congestion on an already busy Southern Cross Drive impacting Sydney Airport directly as could cause significant delays for employees, pilots and Sydney Airport commuters to access the airport.	
SE-75421957			Botany is already a congested suburb - adding more traffic by way of trucks transporting waste materials to an already busy area without proper infrastructure will cause further pressure. The waste transfer station will be in a high density residential area so any hazardous materials are a major concern as well.	
SE-74771212	Traffic	Parking	The project will excessively reduce on-street parking spaces available for the community as it: ▪ removes 5 on-street car parking spaces ▪ only provides 13 on-site car parking spaces against the 52 on-site car parking spaces required by the Bayside DCP. Of these 13 car parking spaces provided, only 9 are for staff. This will result in staff parking on the street further reducing on-street car parking spaces for other community users.	Loss of on-street parking has been addressed in section 8.6 of the TIA (Appendix C). The current development that is located at the site has a shortfall of 17 spaces which is expected to be contributing to the on-street car parking demand in the local area. The design of the project makes provision for a total of 15 car parking spaces comprising 11 staff spaces, and four visitor spaces, meeting Council's post-lodgement requirements (refer to Section 8.1.2 of Appendix C). As the design of the project has will provide sufficient on-site

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			The project should be redesigned to prevent any reduction in on-street parking spaces and provide the on-site parking spaces required by the DCP. If can not be redesigned as such, then it should not proceed.	parking to accommodate its maximum operational demands, it is expected that there will be a net reduction of up to 12 parking spaces in the on-street parking demand as a consequence of the development (i.e. existing car parking credit of 17 car spaces less the loss of 5 on-street car spaces).
SE-75302707			We the undersigned would like to bring the department's attention that Hale Street, Botany currently suffers from serious traffic congestion especially in the morning and afternoon peak periods as well as a significant shortage of parking. The loss of five parking spaces and an additional 412 trucks (94 of which will be B doubles) will obviously exacerbate the problem greatly as well as contribute markedly to local pollution. At different times of the day traffic is banked up bumper to bumper; eastwards in the morning and westwards in the afternoon.	
SE-75369207			Entering this way would also necessitate removal of the street parking which currently exists, and parking is already in short supply in this area.	
SE-75415717			▪ Council DCP requirements indicate that a parking (and not just a traffic) survey should be undertaken. A detailed parking study does not appear to have been undertaken and therefore the impact of the loss of at least 5 on-street car spaces to accommodate the proposed development have not been assessed thoroughly. ▪ We are informed that on-street car parking is often fully utilised - it is unclear therefore what provisions will be made, if any, for the net loss of valuable on-street car parking which benefits the wider industrial zone. ▪ In addition there appears to be the circumstance that additional on-street car parking spaces will be affected by the heavy vehicle truck swept paths entering and departing the site and this should be clarified.	
SE-74851230	Traffic	Traffic management	While the project is a state project and council are responsible for the traffic management on Botany Rd, I don't think an adequate resolution to this	An updated TIA has been provided as Appendix C which addresses all of Council's

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			management to minimise the use of Botany Rd For heavy Vehicles has been properly addressed. My business is on Botany Rd - I watch at least 5-6 semi trailers with loads drive down it every day. Despite the requirement for them to use Foreshore Rd as outlined in your submission WHO IS GOING TO ENFORCE THIS.	comments following the submission of the EIS which incorporate community concerns. A future operational plan of management will be implemented requiring all heavy vehicles to arrive/depart via General Holmes Drive (M1). This plan of management will specifically note that no heavy vehicles are to access the site from the east via Hale Street (east of Luland Street) or Luland Street. A “NO RIGHT TURN” sign will be installed opposite the commercial vehicle driveway facing westbound traffic on Hale Street. A “NO LEFT TURN” sign will be installed within the site on the exit side of the commercial vehicle driveway.
SE-75369207			Most likely, drivers arriving will likely choose to do a 180deg turn at the roundabout at Luland St, then a right turn across the oncoming traffic lane to enter, or exit left to the roundabout and do a 180deg turn to exit Hale St to the West. In my opinion, 406 such manoeuvres per day is unacceptable. Further, the road at that point is soft and unstable, as it is flooded with sea water twice a day during peak tides, and requires ongoing repair already, let alone with the stress of 406 U turns by heavy trucks per day. This sort of entry / exit would be truly chaotic during heavy traffic periods as these vehicles would be blocking traffic even more that is already the case. Note that the entry point proposed is, on its eastern edge, < 10m from the roundabout. SUGGESTION: If this proposal is accepted, it should be stipulated that trucks are prohibited from doing 180deg turns at the roundabout and the intersection with Luland St.	
SE-75415717			▪ The proposed queuing arrangements appear to be reliant upon management by on-site staff - if so how will this be undertaken and what happens if more than 5 heavy vehicles arrive at the site at any given time (given the site has a queuing capacity for 5 heavy vehicles only)? In the event that more trucks arrive at the site and there is insufficient queue space on site, what will be the path that heavy vehicles take within the local road network to enable them to circle and return to access the site?	

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			▪ Of particular concern is the impact to the local road network in the situation that independent truck operators/contractors (driving 26m to 19m long heavy vehicles) enter Hale Street from the west (as set out in the TIA) and are then unable to enter the site in peak periods. In such a situation it is unclear where trucks will go or where they wait. Presumably they will be forced to head east along Hale Street past the site. In this regard it is noted that there is restricted vehicle access to Botany Road from Hale Street - therefore large heavy vehicles will presumably need to use the round-about intersection at Hale Street and Luland Street and or attempt U turns somewhere in Hale Street and or Luland Street. It is unclear if that is physically possible, and no detailed analysis has been undertaken of this scenario. It is considered that such a situation is likely to have an unsafe and significant adverse impact on the functioning of surrounding road network. ▪ In considering the above matters, it is unclear from the information provided in the application what the proposed method of coordination and enforcement of the proposed traffic and parking procedures will be for the day-to-day operations of the facility. It is unclear how the arrival and departure arrangements for heavy vehicles will be managed - such that, what will prevent heavy vehicles from arriving at the site from the east or departing in an eastward direction? While heavy vehicle trip numbers and distribution routes are outlined in the TIA, it is unclear how these arrangements and movements will be enforced and managed on an hourly and daily basis. It is unclear what will happen if the stated number of heavy vehicle trips (412 vehicle trips per day) are exceeded, that is, how will the operator maintain the proposed truck movements to the level that has been stated and assessed in the TIA, and how will the operator reduce truck movements in the event that additional trucks seek to use the facility. In summary there does not appear to be a detailed explanation of the required management processes to coordinate the 412 truck movements and the 54 smaller vehicle movements each day and to ensure that they use the proposed distribution routes. Nor does there appear to be identified mitigation measures proposed if additional heavy vehicle truck movements occur and or the circumstances eventuate that there is insufficient queuing space at the	

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			facility.	
SE-74957228	Traffic	Queuing	The traffic in Botany is already a nightmare. This particular bottle neck at the bottom of Hale street in the mornings and afternoons will be made far worse with up to 200 truck movements a day. These trucks will be lining up waiting and blocking the road as access is inadequate. I cannot see in any reasonable terms that this much traffic directed into a small area can work.	A queuing assessment has been provided as section 9.8 in the TIA and concludes that all nominal queuing demands are expected to be satisfactorily accommodated entirely within the site under extremely conservative operational conditions, and the development is expected to operate satisfactorily without impacting the operation of Hale Street. The queuing analysis (section 9.8 of Appendix C) has been undertaken in accordance with conventional queuing theory under extremely conservative operational conditions and reveal the site has been designed to satisfactorily accommodate the 98th percentile queue, and that it statistically improbable for any vehicles to queue beyond the site on Hale Street, being less than 0.008%. KLF has provided a breakdown of the operational process as summarised in Section 9.8 of the TIA indicating the total dwell time for a heavy rigid vehicle on site is less than seven minutes and the total dwell time of a B-double vehicle on site is approximately 10 minutes. The queuing analysis was undertaken using the following conservative parameters: ▪ All vehicles have been assumed to comprise 25/26m B-doubles. ▪ All vehicles have been assumed to have an average dwell time of 10 minutes. ▪ The site has the capacity to accommodate up to seven × 25/26m B-double vehicles at any one time as demonstrated in the

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				swept path analysis. The site will operate in a sequential arrangement and as such the likelihood of vehicles needing to overtake another truck is statistically improbable..
SE-75021478			The proposed facilitys capacity is going to generate a substantial increase in traffic, particularly on Hale Street and Foreshore Road. Hale Street is already heavily congested with heavy vehicles, and adding more traffic from waste management operations will exacerbate the situation, leading to increased risk of accidents.	
SE-75292458			The increase in traffic through Hale St, which is already beyond capacity in both morning and evening peak hours would cause build up of vehicles trying to exit Chegwyn St as this is a one way Street so all traffic leaving the council carpark plus businesses in that street plus vehicles doing deliveries and pick ups would have difficulty exiting into Hale St.	
SE-75302707			We the undersigned would like to bring the department's attention that Hale Street, Botany currently suffers from serious traffic congestion especially in the morning and afternoon peak periods as well as a significant shortage of parking. The junction with Foreshore Road will also be affected negatively as traffic is often exceedingly heavy near the interface. Entrance and egress to the other businesses in the surrounding area already has to be avoided if possible in peak hours; if this development went ahead it would be largely impractical all day.	
SE-75369207			There is huge potential for queueing problems, spilling out into Hale St which, should it happen with a single truck, would be devastating for existing road traffic. Queueing Again, using EIS numbers, 168 arrivals per day. 80% during daytime hours = 134 arrivals. That is 12 per hour for 11 daytime hours. That is 5 minutes per truck allowable in this facility, to weigh, unload, and leave. I contend that is not possible. Plus, at the same time, about 3 much bigger trucks arrive per hour, to remove the sorted waste. They will have to arrive, weigh, load and leave with 20 mins turnaround. Yet, when I look at the diagram on p24, it is hard to comprehend	

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			how that can work. There is plainly no room for passing or parking of trucks, so I foresee a serious queuing problem. When that happens, I will lay money that some driver is going to stop in Hale St, waiting to enter the facility. That is going to cause utter chaos. Who will be on hand to prevent that?	
SE-75314723			I have noted the entrance to the proposed Waste Management Plant is to be by Hale St and Foreshore Rd, and the large number of trucks coming in and out each 24 hours. My home is on Botany Rd, very close to the traffic lights at Hale St where the trucks would turn in and out. Apart from the Botany Shopping centre, this part of Botany Rd is very residential. It seems sensible that the major entrance and exit point would be by Foreshore Rd. There are no homes in this area, noise at any time would not annoy any residents.	
SE-75415717			▪ The proposed queuing arrangements appear to be reliant upon management by on-site staff - if so how will this be undertaken and what happens if more than 5 heavy vehicles arrive at the site at any given time (given the site has a queuing capacity for 5 heavy vehicles only)? In the event that more trucks arrive at the site and there is insufficient queue space on site, what will be the path that heavy vehicles take within the local road network to enable them to circle and return to access the site? ▪ Of particular concern is the impact to the local road network in the situation that independent truck operators/contractors (driving 26m to 19m long heavy vehicles) enter Hale Street from the west (as set out in the TIA) and are then unable to enter the site in peak periods. In such a situation it is unclear where trucks will go or where they wait. Presumably they will be forced to head east along Hale Street past the site. In this regard it is noted that there is restricted vehicle access to Botany Road from Hale Street - therefore large heavy vehicles will presumably need to use the round-about intersection at Hale Street and Luland Street and or attempt U turns somewhere in Hale Street and or Luland Street. It is unclear if that is physically possible, and no detailed analysis has been undertaken of this scenario. It is considered that such a situation is likely to have an unsafe and significant adverse impact on the functioning of surrounding road network. ▪ In considering the above matters, it is unclear from the information provided in the application what the proposed method of coordination and	

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			enforcement of the proposed traffic and parking procedures will be for the day-to-day operations of the facility. It is unclear how the arrival and departure arrangements for heavy vehicles will be managed - such that, what will prevent heavy vehicles from arriving at the site from the east or departing in an eastward direction? While heavy vehicle trip numbers and distribution routes are outlined in the TIA, it is unclear how these arrangements and movements will be enforced and managed on an hourly and daily basis. It is unclear what will happen if the stated number of heavy vehicle trips (412 vehicle trips per day) are exceeded, that is, how will the operator maintain the proposed truck movements to the level that has been stated and assessed in the TIA, and how will the operator reduce truck movements in the event that additional trucks seek to use the facility. In summary there does not appear to be a detailed explanation of the required management processes to coordinate the 412 truck movements and the 54 smaller vehicle movements each day and to ensure that they use the proposed distribution routes. Nor does there appear to be identified mitigation measures proposed if additional heavy vehicle truck movements occur and or the circumstances eventuate that there is insufficient queuing space at the facility.	
SE-75021478	Traffic	Safety	There is already a waste management facility operated by Wanless Recycle at the end of Bay Street, located just a few hundred meters from the public school. The trucks servicing this facility are often seen driving recklessly through narrow streets, posing a significant danger to pedestrians and other road users. Adding another facility in close proximity would likely compound these issues, making the area even less safe.	A crash data analysis has been undertaken in Section 5.2 of the TIA (Appendix C) for the most recent five year period between 2019 and 2023 and reveal no clear indication of recurring crash themes nor any existing underlying road safety issues. The project has been assessed to result in a net reduction in the traffic generation potential of the site and is not expected to contribute to any notable change in relation to the number of crashes in the vicinity of the site.
SE-75302707			The large trucks including B doubles currently accessing "Portair" regularly cause damage to the gutters, electricity poles etc. This will inevitably increase.	
SE-75304712			Finally, I live at Kurnell. Breen Resources - Waste Management and Disposal Centre is situated on our only road access to the village. We endure the trucks and the waste that falls from the loads, that have resulted in several closures of	

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			the road and damage to cars. We also have the drivers of those types of trucks blatantly flouting the road rules and tailgating cars because they are paid by the load (not hourly) so they are always in a hurry. We certainly don't want this to occur on our local roads in Botany.	
SE-75356711			Proximity to Existing Waste Facility and Safety Concerns: The proposed site is in close proximity to the existing Wanless Waste Management facility, which operates directly back-to-back on Bay Street. The trucks from Wanless Waste Management frequently speed along local roads, posing a clear safety hazard to residents and students at Botany Public School. The addition of another waste facility in such a small area would compound these safety risks, increasing the likelihood of dangerous driving behavior and putting the community's health and safety at further risk. Traffic and Safety Concerns: The introduction of another waste management facility would significantly increase the volume of heavy vehicles and trucks accessing local roads, exacerbating existing traffic congestion and posing a serious safety risk to pedestrians, cyclists, and drivers. The current road infrastructure is not equipped to handle this heightened traffic flow, which would likely result in increased accidents, noise pollution, and disruptions to the daily lives of local residents. The safety of children walking to and from Botany Public School would be particularly compromised.	
SE-75363973			Traffic coming off Foreshore and over the pipeline into Hale street would be disastrous going both ways as it is only two lanes wide and NO room for error with large vehicles entering or leaving this site.	
SE-75371482			With an estimated 168 inbound truck loads per day and 39 truck loads out this will have a significant impact on an already constrained roadway with Foreshore experiencing significant delays. As the proposed facility will accept B Doubles utilising the CML and HML permits as expressed in Table 5.2 Community feedback they can only enter and exit via Foreshore road which will create significant traffic congestion in an already very congested road. Unfortunately past the site as well there is only a small round about of which I have been witness to many accidents and near misses. With increasing the trucks that will be coming into the area this will create more danger and risk to the other patrons of the road. While the sheer volume of trucks entering and exiting the waste management site will put constraints on the already congested roadways it will be so much worse and have catastrophic impacts to	

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			both Foreshore road and Southern Cross drive if there was a queue or accident near to or in the facility. The congestion would be outreaching leading onto Hale Street, Foreshore and Southern Cross drive negatively impacting the transport industry and also commuters for the airport/aviation industry. It would be gridlock as we cannot divert trucks onto Botany Road as per the Feedback with the B Doubles utilsing HML and CML permits for accessing the Waste Management Facility can only use Foreshore Road and not leave Hale Street via Botany Road.	
SE-75354708			Instead of looking at statistics and making decisions from a desk have someone physically view the already heavily congested traffic trying to enter and exit Hale street/foreshore road and general Holmes drive during peak times.	Consultants from Traffix have attended the site and surrounding area and the TIA has included traffic counts reflective of current traffic conditions along key roadways and intersection in the vicinity of the site.
SE-75363973	Traffic	TfNSW	I have discussed the proposal with Transport of NSW who have indicated that they would also object to this proposal. The traffic flow around Foreshore Road, General Holmes Drive and Hale Street is a priority for movements of export and import containers to the Port precinct. A large increase in the traffic, such as stated in the proposal, would cause massive traffic problems to the public as well as transport companies and would increase the gridlock status and a huge problem for Transport of NSW.	TfNSW provided the following comment on the EIS submission: 'TfNSW has reviewed the submitted information and has no requirements as the proposed development is unlikely to have a significant impact on the classified road network.'
SE-75369207			The site does not appear to be large enough to properly accommodate the proposed business, nor orderly entry and exit of trucks to and from the site. Orderly entry and exit to the site does not appear feasible The diagrams on pp 24 and 28 of the EIS make this fairly clear. Hale St is narrow. There is, in my estimation, little chance heavy rigid trucks, and definitely not articulated trucks, can turn left from Hale St, into such a facility. That involves making a ~135 deg hard turn, and there simply isn't enough space. If possible at all, these vehicles would have to swing onto the other side of the road to make the turn. That is completely unacceptable, 206 times per day, and possibly worse for the remaining 20% of movements, at night. The diagram on p24 appears to suggest turning left from Hale St to enter, and turning right onto Hale St, to exit. I do not see that is workable. THE SITE APPEARS TO BE BARELY SUFFICIENT FOR SUCH A BUSINESSES Looking at the diagram on p24, it is clear that this is not a big site, in the context of the proposed use.	A swept path analysis has been undertaken in the TIA (Appendix C), the largest design vehicle being a 26m B-double, demonstrates satisfactory ingress/egress in accordance with AS 2890.2 (2018).

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			I question the viability of offloading 1000 tonnes per day into such a compressed space. Using the numbers from the EIS, ~10 trucks per hour will be dropping of waste during daytime hours. So there will be 5 minutes per truck, to weigh, drop off, and exit. At the same time, another set of trucks are supposedly also arriving, loading and exiting with average 20 mins turnaround. As noted earlier, there is obviously no scope for trucks passing in the same direction, in the proposed facility. They are all, whether dropping off, or leaving loaded, entering and exiting in a single line. To me, this sounds highly unworkable. And utterly unrealistic. I see no way of scheduling arrivals and departures in any significant way, let alone in a manner which would allow the processing of 1000 tonnes of waste, per day, in such a confined space, in such a congested road context. RE ATTACHED PHOTOS *These are taken from the western edge of the roundabout, looking at the eastern end of the site. According to the EIS, trucks, including B Doubles, are (apparently) going to come from the Foreshore Rd (to the left in these photos, and make a left hand turn from Hale St into a driveway sited where this building currently stands, and exit by making a right hand turn onto Hale St. *Given the near ~135deg turn (at least) that requires in a very tight space, I suggest that is a/ likely not possible for larger trucks, and b/ only possible for most of them if they swing across the centreline of the road before turning left.	
SE-75371482	Traffic	Construction traffic	The proposed location for this Waste Management Facility on 2-4 Hale Street, Botany will have significant impact on the congestion and traffic management in the Port Botany area having a significant negative impact on our Transport and Logistics industry in NSW being located so close to Foreshore road which is utilised by transport providers to access Port Botany for imports and export containers which is fundamental to our economic viability as a State. While construction is occuring and if there is any delays accessing the Waste Management Facility by trucks the traffic flow on effect will be that Hale Street will be blocked due to congestion and this will create congestion and traffic stoppages on Foreshore road. This will have significant impacts on the import and export industry which are required to meet set timeslots at the wharf for collecting imports and exporting containers. Significant delays and charges incurred by NSW Transport providers will contribute to the higher cost of living	Construction traffic generation of approximately 124 vehicles per day is anticipated at the peak of the works, with 48 of these vehicles to be heavy vehicles and 76 light vehicles. It is anticipated that a peak of 4 two-way truck movements may occur during a peak one hour period. Given the anticipated construction traffic volumes being approximately a quarter (~23%) of the heavy vehicle trips expected to be generated by the development during operation, it is therefore reasonable to

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			as transport providers will pass it on to the suppliers who will ultimately pass it on to the end user. Congestion on Foreshore road caused by construction and potential queuing impacts creating traffic congestion and significant delays to access Hale Street due to the Waste Management Facility could create congestion on an already busy Southern Cross Drive impacting Sydney Airport directly as could cause significant delays for employees, pilots and Sydney Airport commuters to access the airport.	conclude the surrounding road network can satisfactorily accommodate this volume of traffic. A construction traffic and pedestrian management plan (CTPMP) was submitted with the EIS. The report addresses the existing conditions of the site, general overview of the construction program and traffic management arrangements which are proposed at this early stage. It should be noted that a comprehensive CTPMP will be prepared following approval of the project, once a builder has been appointed to the project and the exact construction methodology is determined.
SE-75415717	Traffic	Access	▪ There does not appear to have been any detailed analysis undertaken as to the safety of heavy vehicles entering and exiting the site (i.e. 412 times a day) having regard to the complex existing circumstances of the immediate road network including the following aspects: - The western edge of the proposed truck entry and exit driveway is approximately 40m away from a significant rise in the road level of Hale Street to the west - vehicles will be accelerating down the slope towards the site; - The eastern edge of the proposed truck entry and exit point appears to be approximately only 15m from the roundabout intersection of Luland Street and Hale Street; - The proposed truck driveway is opposite an existing driveway at 12 Luland Street and is diagonally opposite two more driveways at 270-29 Hale Stret and 31 Hale Street; - The swept path analysis appears to indicate truck movements over the on-street parking spaces on the southern side of Hale Street, opposite the subject site.	Updated traffic modelling has been undertaken demonstrating the proposed site access driveways will operate satisfactorily as assessed in Section 9 of the TIA (Appendix C). The proposed position of the driveway has been satisfactorily designed in accordance with AS 2890.1 (2004) and AS 2890.2 (2018) and will operate safely and efficiently. The driveway has been strategically positioned to satisfy site operational requirements and is located as far practicable from Foreshore Road being the critical classified road. Vehicles must reduce their speed to an appropriate and safe level when making a turn to maintain control and ensure the safety of all road users, especially in the context of large heavy vehicles. In this regard, vehicles slowing down on approach to the roundabout is favourable in the circumstance.

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SE-75415717	Traffic	Traffic generation	The TIA states that: "Heavy vehicle movement are split between the day/nighttime periods with 80% of trucks arriving between 7am-6pm and 20% between 6pm-7am, with the following truck volumes expected during road network peak periods: ▪ Articulated Vehicles up to 26m B-doubles and Truck and Dogs up to 19.6m: - 8 vehicle trips per hour (4 in, 4 out). ▪ Rigid Vehicles up to 12.5m: - 24 vehicle trips per hour (12 in, 12 out). ▪ Combined: - 32 vehicle trips per hour (I 6 in, 16 out)." The above truck movements do not include small vehicles trip generation at the site which will be additional and is stated in Part 6.11 of the TIA as: ▪ "54 vehicle trips per day (27 in, 27 out); and ▪ 54 vehicle trips per day (27 in, 27 out)." It is unclear if the second line of the above is a typographical error.	Development trip generation has been updated as section 9.2 in the updated TIA attached as Appendix C. Cumulative trip generation includes both heavy vehicle trips and staff trip generation as detailed in section 9.2.5 with 37 vehicle trips per hour during the AM peak period and 37 vehicle trips per hour during the PM peak period.
SE-75415717	Traffic	Access	Our review of the TIA raises the following specific concerns: ▪ There does not appear to have been any detailed analysis undertaken as to the safety of heavy vehicles entering and exiting the site (i.e. 412 times a day) having regard to the complex existing circumstances of the immediate road network including the following aspects: - The western edge of the proposed truck entry and exit driveway is approximately 40m away from a significant rise in the road level of Hale Street to the west - vehicles will be accelerating down the slope towards the site; - The eastern edge of the proposed truck entry and exit point appears to be approximately only 15m from the roundabout intersection of Luland Street and Hale Street; - The proposed truck driveway is opposite an existing driveway at 12 Luland Street and is diagonally opposite two more driveways at 270-29 Hale Stret and 31 Hale Street;	Detailed SIDRA modelling results are discussed in Section 9.5 of the updated TIA (Appendix C). SIDRA movement summary output identifies a maximum 95th percentile queue of 22.1m during road network peak periods under existing plus development scenarios, and a maximum 95th percentile queue of 31.1m during road network peak periods under future (10 year horizon) plus development scenarios. The proposed site egress driveway being positioned approximately 32m away from the Luland Street west approach to the roundabout will therefore not have any interaction with the 95th percentile queue and will operate safely and efficiently.

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			- The swept path analysis appears to indicate truck movements over the on-street parking spaces on the southern side of Hale Street, opposite the subject site.	Swept path analysis have been updated with recent Nearmap aerial georeferenced in the background clearly demonstrating 26m B-double vehicles will be able to ingress and egress the site satisfactorily in accordance with AS 2890.2 (2018).
SE-75415717	Traffic	Traffic numbers	▪ It is not clear how the expected 412 truck movements per day have been calculated- the analysis in the TIA is based on this assumption and therefore it should be explained in detail. Assessment does not appear to have been undertaken for a scenario whereby more truck movements could occur. ▪ The basis of the assumed heavy vehicle movement split between the day/nighttime periods (with 80% of trucks arriving between 7am-6pm and 20% between 6pm-7am) is not clear.	The TIA has been updated to provide detailed calculations on how the anticipated heavy vehicle trip generation associated with the proposed development has been estimated including a breakdown of the vehicle types, refer to Section 9.
SE-74849957	Noise		I am worried about the probable contamination and noise outlined in the Appendix Q of the Report and I am not convinced it would be properly controlled as a safety hazard.	A NVIA was submitted with the EIS and has been updated and attached as Appendix J which concludes that the project is compliant with the relevant noise and vibration criteria controls for this type of development, and it is expected to comply with the applicable regulations with regards to operational noise, road noise and vibration, subject to the mitigation measures outlined within Section 9 and Section 10 of the NVIA.
SE-75272489			Hale Street is already a very noisy area from airplanes at Sydney Airport and truck and car traffic along Foreshore Road. The noise travels along Hale Street, and the noise has been irritating since Hale Street was opened to traffic from Foreshore Road in 2011.	
SE-74853711			I object as the site will create incremental pollution in the area with the creation of extra noise, smell and potential dangerous material in an area where there is already too much pollution with the airport and port.	
SE-75292458			Noise. We have been told the estimated number of trucks daily but there will be a constant background noise 24/7 from equipment such as bulldozers, diggers, excavators etc. My home, at 18 Erith St., which I bought before the airport noise debacle, is one of the closest to this proposed Waste Management Facility and I think that	

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			the stench, especially in summer would be beyond description , and I feel that with the constant background noise of large vehicles and heavy machinery it would make it impossible to have any outdoor social life whatsoever.	
SE-75314723			I have noted the entrance to the proposed Waste Management Plant is to be by Hale St and Foreshore Rd, and the large number of trucks coming in and out each 24 hours. My home is on Botany Rd, very close to the traffic lights at Hale St where the trucks would turn in and out. Apart from the Botany Shopping centre, this part of Botany Rd is very residential. It seems sensible that the major entrance and exit point would be by Foreshore Rd. There are no homes in this area, noise at any time would not annoy any residents.	
SE-75361995			We live at very close proximity to the proposed Waste Management Facility and our 7 year old son attends the public school that is also neighbouring the site, and thus would also be negatively affected by this facility, and we feel great distress around this proposal! We're gravely concerned about the hazardous materials that would be dealt with their, the pollution caused by the waste as well as the large amount of vehicles that would be coming in and out of the facility and suburb daily, by the currently contaminated materials there being disturbed and circulated in the air and nearby waterworks, the noise, smells, traffic. Not only would residents nearby be affected but the WHOLE community through the children attending the school being exposed, and the suburb and nearby areas with all the increased traffic and particles carrying over. Botany Public School, Mill Ponds, residents need to be considered and this project needs to be rejected! We need to think about the population and children and the long term effects of these decisions!	
SE-75366710			A Waste Transfer Station at the bottom of Bay Street, Botany is inappropriate. It will create huge issues with traffic, pollution (noise/ toxic hazards/ smell/ water pollution to Botany Bay) located so close to residential/ educational areas. A more appropriate location is required as the industrial zone in this region shrinks.	
SE-75366765			The proximity of the proposed site to residential areas and a public school poses serious risks, including air and noise pollution, increased traffic congestion, and potential exposure to hazardous materials. These issues are particularly concerning for children, who are more vulnerable to the adverse effects of environmental pollutants. The potential decrease in property values is also a valid concern for homeowners like myself.	

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SE-75367740			I am concerned about noise, pollution, potential hazardous materials pollution and increased traffic congestion from hale street onto foreshore road.	
SE-75371482			The NSW EPA specifically states poorly run waste management facilities can cause leachate, dust, offensive odours and noise. Poor waste disposal, especially of hazardous wastes can result in harmful chemicals leaching into the soil, groundwater and surface water becoming a risk to human health and the environmental. An estimated 2 million tonnes of hazardous waste was generated in NSW in 2019/20. Asbestos and contaminated soils accounted for 72% of this, Source: Waste and Recycling | NSW State of the Environment.	
SE-74771212	Air Quality	Sensitive receptors	The findings of the Sensitive Receptors section (6.3.2.1) regarding Air Quality and Odour remains an unacceptable risk to the health of the many residents, school children and workers located in very close proximity to the site.	Section 6.3.2.1 of the EIS details sensitive receptors identified in the AQIA in line with the Approved Methods (NSW EPA, 2022a) guidelines.
SE-74771212	Air Quality	Odour	The findings of the Sensitive Receptors section (6.3.2.1) regarding Air Quality and Odour remains an unacceptable risk to the health of the many residents, school children and workers located in very close proximity to the site. All waste transfer stations, no matter how modern, generate odours, airborne pollutant particles and visual rubbish from the process of truck transportation and transfers.	As detailed in section 6.9.4.1 of the EIS, the Waste Classification Guidelines (2014) describe non-putrescible materials as those that “typically do not: readily decay under standard conditions, emit offensive odours, attract vermin or other vectors (such as flies, birds and rodents)”. The site will only handle non-putrescible waste, and as such offensive odours are not expected. The project will have management procedures in place to ensure vegetation waste will not compost on site and the site will not accept putrescible waste or kerbside green waste from Council collections.
SE-74849981			Given this project will take waste vegetation material I object to its placement near housing and the local school. There is no indication that this facility will not take asbestos or other hazardous building materials. There are also food and alcohol manufacturers adjacent to this proposed waste facility that may be impacted by dust or airbourne pollutants. The school is of particular concern also.	

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SE-74853711			I object as the site will create incremental pollution in the area with the creation of extra noise, smell and potential dangerous material in an area where there is already too much pollution with the airport and port.	
SE-75022457			I live close to this development and my biggest concerns are as follows. The noise as no other business runs 24/7 in the area. The smell and possible pollutants, toxins, dirt and possible asbestos being dispersed.	
SE-75292458			3) Smell. I feel that there will be a constant smell of rotting food and vegetation and in the summer this would be unbearable making it impossible to use any outdoor facility, My home, at 18 Erith St., which I bought before the airport noise debacle, is one of the closest to this proposed Waste Management Facility and I think that the stench, especially in summer would be beyond description , and I feel that with the constant background noise of large vehicles and heavy machinery it would make it impossible to have any outdoor social life whatsoever.	
SE-75314723			I also read waste would be sorted into plant feed, clean concrete and brick, metal and light mixed waste. My presumption is there will be no human food rubbish. So I expect this plant will not give off any smells apart from plant smells.	
SE-75361995			We live at very close proximity to the proposed Waste Management Facility and our 7 year old son attends the public school that is also neighbouring the site, and thus would also be negatively affected by this facility, and we feel great distress around this proposal! We're gravely concerned about the hazardous materials that would be dealt with their, the pollution caused by the waste as well as the large amount of vehicles that would be coming in and out of the facility and suburb daily, by the currently contaminated materials there being disturbed and circulated in the air and nearby waterworks, the noise, smells, traffic. Not only would residents nearby be affected but the WHOLE community through the children attending the school being exposed, and the suburb and nearby areas with all the increased traffic and particles carrying over. Botany Public School, Mill Ponds, residents need to be considered and this project needs to be rejected! We need to think about the population and children and the long term effects of these decisions!	
SE-75366710			A Waste Transfer Station at the bottom of Bay Street, Botany is inappropriate. It will create huge issues with traffic, pollution (noise/ toxic hazards/ smell/	

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			water pollution to Botany Bay) located so close to residential/ educational areas. A more appropriate location is required as the industrial zone in this region shrinks.	
SE-75371482			The NSW EPA specifically states poorly run waste management facilities can cause leachate, dust, offensive odours and noise. Poor waste disposal, especially of hazardous wastes can result in harmful chemicals leaching into the soil, groundwater and surface water becoming a risk to human health and the environmental. An estimated 2 million tonnes of hazardous waste was generated in NSW in 2019/20. Asbestos and contaminated soils accounted for 72% of this, Source: Waste and Recycling | NSW State of the Environment	
SE-74771212	Air Quality	Air pollution	The findings of the Sensitive Receptors section (6.3.2.1) regarding Air Quality and Odour remains an unacceptable risk to the health of the many residents, school children and workers located in very close proximity to the site. All waste transfer stations, no matter how modern, generate odours, airborne pollutant particles and visual rubbish from the process of truck transportation and transfers. The current air quality and pollution dust in the area is already relatively poor from aircraft and truck fuel, evident by the black dust that covers surfaces after a short period of time. A waste transfer station that will process much toxic and banned waste and the increase in truck emissions in very close proximity to a large population, substantially increases the health risk of the local community.	An AQIA was undertaken and submitted with the EIS (updated as Appendix L) which concludes that the construction and operational phases of the project will not result in any exceedances of the relevant air quality criteria at the surrounding receivers. It is considered that the implementation of the construction and operational phase mitigation methods and good site management practices potential air quality impacts associated with the project will be minimised.
SE-74849981			Given this project will take waste vegetation material I object to its placement near housing and the local school. There is no indication that this facility will not take asbestos or other hazardous building materials. There are also food and alcohol manufacturers adjacent to this proposed waste facility that may be impacted by dust or airbourne pollutants. The school is of particular concern also.	
SE-74853711			I object as the site will create incremental pollution in the area with the creation of extra noise, smell and potential dangerous material in an area where there is already too much pollution with the airport and port.	
SE-75021478			The health and safety of local residents, including children attending Botany Public School, are at risk. The introduction of a large-scale waste management facility could increase exposure to hazardous materials and pollutants, jeopardizing the well-being of the community, especially vulnerable populations like schoolchildren.	

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SE-75022457			I live close to this development and my biggest concerns are as follows. The noise as no other business runs 24/7 in the area. The smell and possible pollutants, toxins, dirt and possible asbestos being dispersed.	
SE-75272489			The facility is also next to the Mill Stream Pond River which flows into Botany Bay. Fish from Botany Bay are consumed by locals. The water in Botany Bay is already polluted, there is no need to increase the water, noise and air pollution.	
SE-75292458			Then there is the question of airborne dust, such as asbestos, which they wont be able to guarantee is not coming in from building sites, plus cement dust to name just a couple.	
SE-753047212			The dust from unloading waste can cause air pollution and have a direct impact on the local school children, workers, residents and pets.	
SE-75354708			I heavily object to the submission of a waste management facility in the proposed location of Hale street. It's close proximity to waterways (Mill Pond) and a Children's public school playground (Botany Bay School) is reason enough for this facility to not be approved. It's not physically possible for a 100% guarantee that dust and air pollution will be contained within the premises at all times let alone from the trucks carrying the waste/harmful chemicals during the construction or ongoing running of the facility.	
SE-75356711			Health Concerns: The proposed waste management facility poses significant health risks to local residents, particularly given its proximity – less than 300 meters – from Botany Public School. Within this short distance, there are numerous residential homes directly impacted by potential airborne contaminants and unpleasant odors from the facility. Of particular concern is the handling of construction materials that may contain hazardous substances, such as asbestos, which could severely affect vulnerable populations, including children, the elderly, and individuals with respiratory conditions. The risk of exposure to these pollutants is unacceptable in such a densely populated and sensitive area. Environmental Impact on Nearby Parks and Waterways: The proposed site is located adjacent to Sir Joseph Banks Park, the largest and most popular park in Botany, and also borders Mill Ponds. The facility's operations would undoubtedly deteriorate the local air quality and could lead to the pollution of	

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			these cherished green spaces and waterways. Such environmental degradation not only threatens wildlife and natural habitats but also diminishes the quality of life for residents who rely on these areas for recreation and community activities.	
SE-75361995			We live at very close proximity to the proposed Waste Management Facility and our 7 year old son attends the public school that is also neighbouring the site, and thus would also be negatively affected by this facility, and we feel great distress around this proposal! We're gravely concerned about the hazardous materials that would be dealt with their, the pollution caused by the waste as well as the large amount of vehicles that would be coming in and out of the facility and suburb daily, by the currently contaminated materials there being disturbed and circulated in the air and nearby waterworks, the noise, smells, traffic. Not only would residents nearby be affected but the WHOLE community through the children attending the school being exposed, and the suburb and nearby areas with all the increased traffic and particles carrying over. Botany Public School, Mill Ponds, residents need to be considered and this project needs to be rejected! We need to think about the population and children and the long term effects of these decisions!	
SE-75366710			A Waste Transfer Station at the bottom of Bay Street, Botany is inappropriate. It will create huge issues with traffic, pollution (noise/ toxic hazards/ smell/ water pollution to Botany Bay) located so close to residential/ educational areas. A more appropriate location is required as the industrial zone in this region shrinks.	
SE-75366765			The proximity of the proposed site to residential areas and a public school poses serious risks, including air and noise pollution, increased traffic congestion, and potential exposure to hazardous materials. These issues are particularly concerning for children, who are more vulnerable to the adverse effects of environmental pollutants. The potential decrease in property values is also a valid concern for homeowners like myself.	
SE-75367740			I am concerned about noise, pollution, potential hazardous materials pollution and increased traffic congestion from hale street onto foreshore road.	
SE-75371482			The NSW EPA specifically states poorly run waste management facilities can cause leachate, dust, offensive odours and noise. Poor waste disposal, especially of hazardous wastes can result in harmful chemicals leaching into the soil, groundwater and surface water becoming a risk to human health and the environmental. An estimated 2 million tonnes of hazardous waste was	

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			generated in NSW in 2019/20. Asbestos and contaminated soils accounted for 72% of this, Source: Waste and Recycling | NSW State of the Environment The dust from unloading waste at the Waste Management Facility can cause air pollution and can have a direct impact on the protected airspace of Sydney Airport. The Waste Management Facility proposed for Botany is expected to make hazardous particles airborne during the destruction and the operations of the Waste Management facility which is located in close proximity to workers, residents, Botany Public School (approx. 283 students) and St Bernards Catholic Primary School (approx. 236 students) and 11 Botany Childcare facilities.	
SE-74771212	Hazards	Waste types	A waste transfer station that will process much toxic and banned waste and the increase in truck emissions in very close proximity to a large population, substantially increases the health risk of the local community.	Section 3.4.7.1 of the EIS describes the incoming waste procedure and details prohibited waste types, including: asbestos, food waste, putrescible waste, liquid waste and other hazardous waste. Section 6.2.3 of the EIS includes the management strategies to demonstrate how the facility will comply with EPA standards for managing construction waste in NSW (2018).
SE-74849981			Given this project will take waste vegetation material I object to its placement near housing and the local school. There is no indication that this facility will not take asbestos or other hazardous building materials. There are also food and alcohol manufacturers adjacent to this proposed waste facility that may be impacted by dust or airbourne pollutants. The school is of particular concern also.	
SE-74853711			I object as the site will create incremental pollution in the area with the creation of extra noise, smell and potential dangerous material in an area where there is already too much pollution with the airport and port.	
SE-75011226			- The location of Botany waste project is less than 500m from me and BOTANY PUBLIC SCHOOL. I know also there are so many young children under age of 14 years old resides in this particular spot. These children are very young and the possibility of contamination of the waste are very dangerous for them: eg airborne risk, ground water contamination etc.	

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			Please please consider of these children future health, would NSW Goverment be willing to guarantee that there will be no impact for these childrens health in the future? Would NSW Government willing to be held responsible if there is any proof in the future that this waste project caused harm to these children in the local area?	
SE-75021478			The health and safety of local residents, including children attending Botany Public School, are at risk. The introduction of a large-scale waste management facility could increase exposure to hazardous materials and pollutants, jeopardizing the well-being of the community, especially vulnerable populations like schoolchildren.	
SE-75022457			I live close to this development and my biggest concerns are as follows. The noise as no other business runs 24/7 in the area. The smell and possible pollutants, toxins, dirt and possible asbestos being dispersed.	
SE-75272489			The Hale Street Waste Management project is too close to Botany Public School and will be a health risk to the children and also to the residents living and working next to the waste facility. Old building materials in Australia very often has asbestos and other toxic materials, and asbestos is often hidden amongst waste material.	
SE-75292458			Then there is the question of airborne dust, such as asbestos, which they wont be able to guarantee is not coming in from building sites, plus cement dust to name just a couple. We already get excessive dirt from the planes and I feel this facility would cause more airborne dust and dirt being detrimental to the health of local residents if it is allowed.	
SE-75304712			The NSW EPA specifically states "Poorly run waste management facilities can cause leachate, dust, offensive odours and noise. Poor waste disposal, especially of hazardous wastes can result in harmful chemicals leaching into the soil, groundwater and surface water becoming a risk to human health and the environment." "An estimated 2 million tonnes of hazardous waste was generated in NSW in 2019-20. Asbestos and contaminated soils accounted for 72% of this" Source: Waste and Recycling | NSW State of the Environment.	
SE-75354708			I heavily object to the submission of a waste management facility in the proposed location of Hale street. It's close proximity to waterways (Mill Pond) and a Children's public school playground (Botany Bay School) is reason enough for this facility to not be	

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			approved. It's not physically possible for a 100% guarantee that dust and air pollution will be contained within the premises at all times let alone from the trucks carrying the waste/harmful chemicals during the construction or ongoing running of the facility. 1 single truck accident or breakdown will prevent complete access over the bridge which will then force trucks to use alternate routes through botany shops. These trucks could be carrying asbestos or hazardous materials and containment cannot be guaranteed.	
SE-75356711			Health Concerns: The proposed waste management facility poses significant health risks to local residents, particularly given its proximity – less than 300 meters – from Botany Public School. Within this short distance, there are numerous residential homes directly impacted by potential airborne contaminants and unpleasant odors from the facility. Of particular concern is the handling of construction materials that may contain hazardous substances, such as asbestos, which could severely affect vulnerable populations, including children, the elderly, and individuals with respiratory conditions. The risk of exposure to these pollutants is unacceptable in such a densely populated and sensitive area.	
SE-75361995			We live at very close proximity to the proposed Waste Management Facility and our 7 year old son attends the public school that is also neighbouring the site, and thus would also be negatively affected by this facility, and we feel great distress around this proposal! We're gravely concerned about the hazardous materials that would be dealt with their, the pollution caused by the waste as well as the large amount of vehicles that would be coming in and out of the facility and suburb daily, by the currently contaminated materials there being disturbed and circulated in the air and nearby waterworks, the noise, smells, traffic. Not only would residents nearby be affected but the WHOLE community through the children attending the school being exposed, and the suburb and nearby areas with all the increased traffic and particles carrying over. Botany Public School, Mill Ponds, residents need to be considered and this project needs to be rejected! We need to think about the population and children and the long term effects of these decisions!	
SE-75363973			My other concerns are the materials that will be transferred through this development and the ramifications for over 1000 workers and their health, working in the immediate area, not to mention the houses in Bay Street that	

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			back onto the property and Botany Primary School which is in the immediate vicinity.	
SE-75366710			A Waste Transfer Station at the bottom of Bay Street, Botany is inappropriate. It will create huge issues with traffic, pollution (noise/ toxic hazards/ smell/ water pollution to Botany Bay) located so close to residential/ educational areas. A more appropriate location is required as the industrial zone in this region shrinks.	
SE-75366765			I am writing to express my strong opposition to the proposed construction of a waste transfer station just meters away from my home and a nearby public school. While I understand the need for effective waste management infrastructure, the location chosen for this project is highly inappropriate and raises significant concerns for the health, safety, and well-being of our community. The proximity of the proposed site to residential areas and a public school poses serious risks, including air and noise pollution, increased traffic congestion, and potential exposure to hazardous materials. These issues are particularly concerning for children, who are more vulnerable to the adverse effects of environmental pollutants. The potential decrease in property values is also a valid concern for homeowners like myself.	
SE-75367740			I am concerned about noise, pollution, potential hazardous materials pollution and increased traffic congestion from hale street onto foreshore road.	
SE-75371482			The NSW EPA specifically states poorly run waste management facilities can cause leachate, dust, offensive odours and noise. Poor waste disposal, especially of hazardous wastes can result in harmful chemicals leaching into the soil, groundwater and surface water becoming a risk to human health and the environmental. An estimated 2 million tonnes of hazardous waste was generated in NSW in 2019/20. Asbestos and contaminated soils accounted for 72% of this, Source: Waste and Recycling | NSW State of the Environment. The Waste Management Facility proposed for Botany is expected to make hazardous particles airborne during the destruction and the operations of the Waste Management facility which is located in close proximity to workers, residents, Botany Public School (approx. 283 students) and St Bernards Catholic Primary School (approx. 236 students) and 11 Botany Childcare facilities.	

Submission ID	Category	Sub-category	Comment	Response
SE-75374457			I object to this project because it is too close to the residential area. This poses a threat to the health of our community and it is of utmost importance that this project be stopped immediately. Thank you for your attention	
SE-74849957	Hazards	Contamination	I am worried about the probable contamination and noise outlined in the Appendix Q of the Report and I am not convinced it would be properly controlled as a safety hazard.	A DSI, RAP and ASSMP were submitted with the EIS to assess and manage any potential contamination risk for the site. A site auditor was engaged to provide an interim opinion confirming the site can be made suitable subjection to the completion of the pre-remediation activities and implementation of the final approved RAP and was submitted with the EIS.
SE-74849957	Hazards	Hazard management	I am worried about the probable contamination and noise outlined in the Appendix Q of the Report and I am not convinced it would be properly controlled as a safety hazard. I would prefer the Planning Authorities err on the side of caution and not approve this development in an area that is more suitable over time for residential construction.	Section 6.9 of the EIS assesses the hazards and risks associated with the project development and provides hazard management strategies that will be implemented. Section 6.9 concludes that hazardous materials and chemicals to be stored on site do not exceed the screening thresholds of Applying SEPP 33 and therefore does not fit the definition of 'potentially hazardous industry' or 'hazardous storage establishment'. Therefore, a preliminary hazard analysis (PHA) is not required. In addition, emissions related to air, noise and water from the construction and operation of the Project have been assessed to determine if the Project will fall under the category of a potentially offensive industry. The findings indicate that the Project is not expected to generate pollution at levels deemed unacceptable, thereby avoiding impact on the amenity of the area. Consequently, it is

Submission ID	Category	Sub-category	Comment	Response
				determined that the Project is not a potentially offensive industry.
SE-75011226			The location of Botany waste project is less than 500m from me and BOTANY PUBLIC SCHOOL. I know also there are so many young children under age of 14 years old resides in this particular spot. These children are very young and the possibility of contamination of the waste are very dangerous for them: eg airborne risk, ground water contamination etc. Please please consider of these children future health, would NSW Goverment be willing to guarantee that there will be no impact for these childrens health in the future? Would NSW Government willing to be held responsible if there is any proof in the future that this waste project caused harm to these children in the local area?	
SE-75272489			The Hale Street Waste Management project is too close to Botany Public School and will be a health risk to the children and also to the residents living and working next to the waste facility. Old building materials in Australia very often has asbestos and other toxic materials, and asbestos is often hidden amongst waste material.	
SE-75292458			We already get excessive dirt from the planes and I feel this facility would cause more airborne dust and dirt being detrimental to the health of local residents if it is allowed. My home, at 18 Erith St., which I bought before the airport noise debacle, is one of the closest to this proposed Waste Management Facility and I think that the stench, especially in summer would be beyond description , and I feel that with the constant background noise of large vehicles and heavy machinery it would make it impossible to have any outdoor social life whatsoever.	
SE-75354708			I heavily object to the submission of a waste management facility in the proposed location of Hale street. It's close proximity to waterways (Mill Pond) and a Children's public school playground (Botany Bay School) is reason enough for this facility to not be approved. It's not physically possible for a 100% guarantee that dust and air pollution will be contained within the premises at all times let alone from the trucks carrying the waste/harmful chemicals during the construction or ongoing running of the facility.	
SE-75361995			We live at very close proximity to the proposed Waste Management Facility and our 7 year old son attends the public school that is also neighbouring the	

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			site, and thus would also be negatively affected by this facility, and we feel great distress around this proposal! We're gravely concerned about the hazardous materials that would be dealt with their, the pollution caused by the waste as well as the large amount of vehicles that would be coming in and out of the facility and suburb daily, by the currently contaminated materials there being disturbed and circulated in the air and nearby waterworks, the noise, smells, traffic. Not only would residents nearby be affected but the WHOLE community through the children attending the school being exposed, and the suburb and nearby areas with all the increased traffic and particles carrying over. Botany Public School, Mill Ponds, residents need to be considered and this project needs to be rejected! We need to think about the population and children and the long term effects of these decisions!	
SE-75363973			My other concerns are the materials that will be transferred through this development and the ramifications for over 1000 workers and their health, working in the immediate area, not to mention the houses in Bay Street that back onto the property and Botany Primary School which is in the immediate vicinity.	
SE-75366710			A Waste Transfer Station at the bottom of Bay Street, Botany is inappropriate. It will create huge issues with traffic, pollution (noise/ toxic hazards/ smell/ water pollution to Botany Bay) located so close to residential/ educational areas. A more appropriate location is required as the industrial zone in this region shrinks.	
SE-75371482			The Waste Management Facility proposed for Botany is expected to make hazardous particles airborne during the destruction and the operations of the Waste Management facility which is located in close proximity to workers, residents, Botany Public School (approx. 283 students) and St Bernards Catholic Primary School (approx. 236 students) and 11 Botany Childcare facilities.	
SE-74851230	Hazards	Contamination management and notification	I'd also like to highlight the fact the current ground contamination is a real concern and residents should be notified about the remedial process so they can make adequate arrangements and adjustments to their own home during this time. When is it likely to be of highest concern during development stages? What is being proposed to minimise risk of small particles in the air during development and remedy of the site?	A RAP was undertaken and submitted with the EIS (updated as Appendix N). The RAP details site management in section 9, with air quality management strategies specified in section 9.6. During remedial works, dust emissions and any odours will be confined within the site boundary. Section 9.12 – of the

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			Thankyou for taking the time to read my submission	RAP conveys that owners and/or occupants of premises adjoining the site will be notified at least seven days prior to the commencement of remedial works.
SE-75292458	Hazards	Contamination management	I understand the soil at the proposed site is already contaminated and that any excavation work to build this facility will disturb hazardous soil materials containing chemicals, asbestos and other poisonous materials present and could lead to hazardous materials becoming airborne with a risk to health of the local community	A RAP was submitted with the EIS (updated as Appendix N) which documents the procedures and standards to be followed to remove the risks posed by the identified potential contamination issues and make the site suitable for the project, while ensuring the protection of human health and the surrounding environment.
SE-75011226	Water	Contamination	The location of this Botany waste project is so closed to the water, its very risky for the water to be contaminated. There will always be defect with science & technology, if there would be some sort of leak that contaminate the ground water, again, would NSW Government would be willing to be held responsible? I am really disappointed that NSW Government even consider creating a waste project that is so closed to a public school, resident & water. Please please consider other location that is more remote & as away as possible from children. Thank you	All wastewater will be discharged to the sewer system and no off-site discharge to Mill Pond will occur. A flood impact assessment and integrated water management report were prepared and submitted with the EIS. Updated versions are attached as Appendix D and Appendix F respectively. Section 10.4 of the flood impact assessment details containment of contamination in a flood event. Notable outcomes include: ▪ There is no putrescible waste or leachate present on this site. ▪ Chemicals are limited to a self-bunded diesel tank, and very small quantities of maintenance oils, grease and general cleaning chemicals stored in designated storage areas within the warehouse. ▪ The waste materials being sorted are primarily concrete, bricks, wood, plastic, paper, soil, and metal. All materials are contained within the building and building doors will be closed during a flood event preventing material from leaving the

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				building. None of this material is conducive to floating or moving in low velocity flood waters. Therefore, the risk of "hazardous" or any other substances being released from the site in a flood event is very low and highly unlikely. ▪ The operations will be fully protected to 500mm above the 1% AEP flood event. ▪ For events of greater intensity (i.e. probable maximum flood (PMF)) there is minimal storage of chemicals or hazardous materials onsite and as there will be very low risk of contaminant release.
SE-75021478			The proposed site is alarmingly close to Sir Joseph Banks Park and Mill Ponds, areas that are integral to the local environment and community. Mill Pond, in particular, has already suffered significant pollution, and placing a waste management facility in such proximity would exacerbate the issue, further degrading the water quality and harming the surrounding ecosystem.	
SE-75304712			As Hale Street is known to flood at least annually during king tides and high rainfall, creating a Waste Management Facility on Hale Street could have significant impacts on the water management strategy. The proposal to have flood reduction facilities put in place to reduce the impact of flooding in Hale Street and the surrounding Botany areas as detailed in botany_bay_foreshore_beach_floodplain_risk_management_study_&_plan_version_e_part_b.pdf (nsw.gov.au)	
SE-75272489			The facility is also next to the Mill Stream Pond River which flows into Botany Bay. Fish from Botany Bay are consumed by locals. The water in Botany Bay is already polluted, there is no need to increase the water, noise and air pollution.	
SE-75354708			It's close proximity to waterways (Mill Pond) and a Children's public school playground (Botany Bay School) is reason enough for this facility to not be approved.	

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SE-75363973			During summer we experience King tides, that result in flooding at the Luland Street/Hale Street roundabout with a foot of water and this could create pollution to the Bay and surrounding waterways with the operation of this development.	
SE-75366710			A Waste Transfer Station at the bottom of Bay Street, Botany is inappropriate. It will create huge issues with traffic, pollution (noise/ toxic hazards/ smell/ water pollution to Botany Bay) located so close to residential/ educational areas. A more appropriate location is required as the industrial zone in this region shrinks.	
SE-75371482			As Hale Street is known to flood in the past creating a Waste Management Facility on Hale Street could have significant impacts on the water management strategy. Hale Street has proposed to have flood reduction facilities put in place to reduce the impact of flooding in Hale Street and the surrounding Botany areas as detailed in botany_bay_foreshore_beach_floodplain_risk_management_study_&_plan_version_e_part_b.pdf (nsw.gov.au) as it is a heavy flood zone.	
SE-74849957	Land Use		I would prefer the Planning Authorities err on the side of caution and not approve this development in an area that is more suitable over time for residential construction.	The project aligns with the objectives of the land use zoning IN1 – General Industrial on which the proposed development is located. In addition, waste or resource management facilities are permitted with consent in accordance with Part 5.2 of the SEPP (Transport and Infrastructure) 2021. The proposed operations are therefore considered a valid and permissible development in the current land use zone.
SE-74957228			Botany was once an industrial area but the council and governments have slowly allowed this to change into mostly residential and as such proposals like these shouldn't even be on the table.	
SE-75011226			The location of Botany waste project is less than 500m from me and BOTANY PUBLIC SCHOOL. I know also there are so many young children under age of 14 years old resides in this particular spot. These children are very young and the possibility of contamination of the waste are very dangerous for them: eg airborne risk, ground water contamination etc. Please please consider of these children future health, would NSW Goverment be willing to guarantee that there will be no impact for these childrens health in the future? Would NSW Government willing to be held responsible if there is any	

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			proof in the future that this waste project caused harm to these children in the local area?	
SE-75272489			The current site at Hale Street could be put to better use, such as a gymnasium for Botany Public School and local children.	
SE-75292458			The docks have been extended causing extra traffic with trucks already queuing along Foreshore Rd waiting to get into the site. We already get excessive dirt from the planes and I feel this facility would cause more airborne dust and dirt being detrimental to the health of local residents if it is allowed. My home, at 18 Erith St., which I bought before the airport noise debacle, is one of the closest to this proposed Waste Management Facility and I think that the stench, especially in summer would be beyond description , and I feel that with the constant background noise of large vehicles and heavy machinery it would make it impossible to have any outdoor social life whatsoever. The increase in traffic through Hale St, which is already beyond capacity in both morning and evening peak hours would cause build up of vehicles trying to exit Chegwyn St as this is a one way Street so all traffic leaving the council carpark plus businesses in that street plus vehicles doing deliveries and pick ups would have difficulty exiting into Hale St.	
SE-75354708			I heavily object to the submission of a waste management facility in the proposed location of Hale street. It's close proximity to waterways (Mill Pond) and a Children's public school playground (Botany Bay School) is reason enough for this facility to not be approved. It's not physically possible for a 100% guarantee that dust and air pollution will be contained within the premises at all times let alone from the trucks carrying the waste/harmful chemicals during the construction or ongoing running of the facility.	
SE-75356711			Health Concerns: The proposed waste management facility poses significant health risks to local residents, particularly given its proximity – less than 300 meters – from Botany Public School. Within this short distance, there are numerous residential homes directly impacted by potential airborne contaminants and unpleasant odors from the facility. Of particular concern is the handling of construction materials that may contain hazardous substances, such as asbestos, which could severely affect vulnerable populations, including	

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			children, the elderly, and individuals with respiratory conditions. The risk of exposure to these pollutants is unacceptable in such a densely populated and sensitive area.	
SE-75366710			A Waste Transfer Station at the bottom of Bay Street, Botany is inappropriate. It will create huge issues with traffic, pollution (noise/ toxic hazards/ smell/ water pollution to Botany Bay) located so close to residential/ educational areas. A more appropriate location is required as the industrial zone in this region shrinks.	
SE-75366765			I am writing to express my strong opposition to the proposed construction of a waste transfer station just meters away from my home and a nearby public school. While I understand the need for effective waste management infrastructure, the location chosen for this project is highly inappropriate and raises significant concerns for the health, safety, and well-being of our community. I urge you to reconsider the location of this facility and explore alternative sites that do not endanger the health and safety of residents or disrupt the daily lives of students and families. Our community deserves to be protected from such intrusive developments, and I trust that you will take our concerns into serious consideration.	
SE-75369207			PROPOSAL IS SIGNIFICANTLY IN CONFLICT WITH BUSINESSES IN THIS AREA All businesses operating in Booralee St, Luland St, the relevant end of Hale St, and indeed nearby streets such as Underwood and Chegwyn St etc, are all light industrial in nature. There is not a single one which creates significant noise, dust, litter or much in the way of traffic, either cars or trucks. Even the modest container terminal in the business park at the south end of Luland St, involves relatively few movements of heavy trucks. Rather, they are typified by relatively small businesses which include automotive services, sheet metal work, warehousing, cabinetmaking etc. These sorts of properties are in short supply in the area, and the loss of such business units at this site would be a bad outcome.	
SE-75374457			I object to this project because it is too close to the residential area. This poses a threat to the health of our community and it is of utmost importance that this project be stopped immediately. Thank you for your attention	

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SE-75369207	Waste	Waste types	PURPOSE OF THIS FACILITY IS AMBIGUOUS The proposal continually refers to a 'construction and demolition waste', yet, the table on p23 of the EIS says it includes 'mixed waste (recyclable and otherwise), building and demolition waste, vegetation waste, timber and wood waste, cardboard, asphalt, and excavated natural materials'	Waste types to be accepted at the facility are clearly defined in Section 3.4.3 of the EIS and quantified in section 3.4.4. These waste types are typical of that which are received at a construction and demolition waste transfer facility.
SE-74849981	Operations	Operational hours	I note the facility will also run 24/7.	Surrounding developments in the area listed in the cumulative impact Section 2.7 of the EIS all are approved or proposed to operate 24/7, which is common for these developments. It is noted waste will not be processed at this facility only separated and transported. As detailed in Section 3.4.1 of the EIS the justification for 24/7 operation is to allow the facility to capture waste generated from the increasing number of sites undertaking construction activities outside of standard construction hours. However 80% of the truck movements will occur during the day time and 20% at night (Refer to section 9.2.2 and 9.2.3 of the TIA – Appendix C).
SE-75022457			I live close to this development and my biggest concerns are as follows. The noise as no other business runs 24/7 in the area.SE	
SE752924558			We, and many other people, bought our houses in Botany knowing that the Airport and docks were there but since buying our properties the 3rd runway has opened at the airport, when this runway was put in we were told no planes would be allowed to take off east to west, this was changed when the Howard government were elected so we now have to contend with the extra noise and though they did the airport noise project when all our house were given noise insulation this did not help if one wanted to have friends and/or family over for an outside venue or just a social cup of tea. Planes are not allowed to take off or land between the hours of 11,00pm to 6.00 am however this facility would 24hr	

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SE-75304712	Operation and Construction	Management	This construction and operation will have significant negative impacts on the protected Biodiversity in the area located in Penrhyn Estuary and Foreshore Beach adjacent to Port Botany and situated close to Hale Street. These areas are home to a wide variety of native species including marine, migratory and shorebirds, mangroves and coastal saltmarsh and seagrasses. Port Botany | NSW Ports. 7. The construction will also have detrimental negative impacts on the partnership Bayside Council and NSW ports are participating in to restore the biodiversity at Sir Joseph Banks Park a crucial natural refuge. Sir Joseph Banks Park a 16-hectare reserve in Botany Bay which contains some of the last remnants of the endangered Eastern Suburbs Banksia Scrub. It plays a vital role in providing habitats for a diverse range of native wildlife, including the Yellow-tailed black cockatoo, ringtail possum, dwarf tree frog and eastern long-necked turtle. Restoring Botany Bay's Biodiversity - Conservation Volunteers Australia.	As committed to in Section 6.18 of the EIS construction and operational environmental management plans will be prepared following approval of the project as nominated conditions or approval and will adopt the framework suggested by the ISO 14001:2015 Environmental Management Systems standards and with guidance from the Guideline for the Preparation of Environmental Management Plans (NSW DIPNR, 2004). The management plans will include construction/ operational conditions and controls, environmental management and procedures to address specific environmental aspects, and prevent indirect impacts off-site inclusive of biodiversity values near to the site.
SE-75356711			Environmental Impact on Nearby Parks and Waterways: The proposed site is located adjacent to Sir Joseph Banks Park, the largest and most popular park in Botany, and also borders Mill Ponds. The facility's operations would undoubtedly deteriorate the local air quality and could lead to the pollution of these cherished green spaces and waterways. Such environmental degradation not only threatens wildlife and natural habitats but also diminishes the quality of life for residents who rely on these areas for recreation and community activities.	
SE-75371482			I object to the Waste Management Facility at Botany as an employee in the Botany region and understands the significant impacts it can have on the Botany community and employees of the area. This project will be determinantal to the Botany area both in traffic management and putting the neighbouring community at risk of being exposed to hazardous pollution. It is very concerning that in the Planning Secretary's Environmental Assessment Requirements letter the EHG is currently considering their request to waive the requirement for a Biodiversity Development Assessment Report (BDAR) for the proposal. Given this proposal is for a Waste Management Facility a very through BDAR should be completed to accompany this proposal to ensure all the Biodiversity of the Botany region is protected as the soil and	

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			pollutants of the Waste Management Facility will have significant impacts to the area.	
SE-74851230	Social	Community engagement	Community and stakeholders within the community namely residents and local business owners have not been adequately advised and notified of the proposed DA. It notes within the submission that residents and business owners were delivered flyers "600 between 14-20th November 2023" within the catchment. I have a local business within the catchment and did not receive any flyer or information in the forum held. Nor did I receive information in the webpage. Furthermore I don't believe 600 flyers is sufficient for a catchment that contains over 25,000 residents and business owners/employees. Furthermore I don't believe the consultation with Bayside Council adequately address the communities concerns (submitted through the online survey) pertaining to use of Botany Road for large Hervey vehicles.	An engagement report including a community and engagement strategy was carried out in accordance with Undertaking Engagement Guidelines for State Significant Projects (DPHI, 2024) and submitted with the EIS. Determination of the community consultation effort was detailed in Section 3 of the engagement report and was formed based on the terrain and surrounding infrastructure that influence potential impacts on the community including Botany Road and General Holmes Drive (M1), Mill Stream, Mill Pond and Sir Joseph Banks Park. Details of the engagement activities were provided in Section 3.3 of the engagement report. The EIS was on exhibition on the Major Projects portal for the statutory minimum period of 28 days between 7 August – 3 September 2024.
SE-75304712			My employer and other stakeholders in the area were not informed of the proposal and therefore the employees were not informed. I do not believe effective and genuine community consultation was actually undertaken.	
SE-75363973			The only notice that we had on this proposal was by one of my workers obtaining a leaflet from a Botany shop and bringing it to my attention on Monday 26th August. As a main stakeholder in the precinct, we (and all Port Air Industrial Estate tenants) should have been informed well in advance of the closing date. Unfortunately, we were left only one week to lodge an objection to this development which in itself I find is controversial. I employ over 50 staff (truck drivers, warehouse, admin and subcontractors), I was only able to petition them for half a day and attach that petition to my submission. There would have been more objections if we had more time to display it.	

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SE-75369207			In the Planning Secretary's Environmental Assessment Requirements letter it emphasises the importance of effective and genuine community consultation. A comprehensive open and transparent community consultation engagement process must be undertaken during the preparation of the EIS. The community must be provided a description of potential impacts which I don't believe has been achieved as limited if any community consultation has taken place especially in regards to the potential negative health, biodiversity, community and traffic impacts.	
SE-75272489	Heritage	Cultural heritage	Nearby Booralee Street and Bay Street are of historic and cultural significance, and the area should be improved for residents and visitors.	Section 6.12 of the EIS details the heritage assessment undertaken for the site. The site is not affected by an interim Heritage Order under the provisions of the Heritage Act 1977 and the site does not contain any European heritage items listed on the State Heritage Register. There are no items listed on the Transport Asset Holding Entity (TAHE) S170 Heritage and Conservation Register within the 'general vicinity' of the site. The construction of the project is not expected to impact on local heritage items due to the limited nature of the works and the separation distance to heritage items. Many heritage items are also separated by roads, easements and other industrial uses. The waste transfer station will be visually consistent with other industrial buildings in the area and should not further obscure the view of surrounding local heritage items from the general public. Additionally, road traffic associated with the operation and construction of the site will not use Erith Street and Bay Street, where the closest local heritage items are located. Therefore, impacts to heritage items are not expected and a full heritage impact assessment is not required.
SE-75304712	Biodiversity	BDAR	A thorough Biodiversity Development Assessment Report must be undertaken, This construction and operation will have significant negative impacts on the protected Biodiversity in the area located in Penrhyn Estuary and Foreshore	A request for a biodiversity development assessment report (BDAR) Waiver was approved by the DPHI on 1st December 2023

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			Beach adjacent to Port Botany and situated close to Hale Street. These areas are home to a wide variety of native species including marine, migratory and shorebirds, mangroves and coastal saltmarsh and seagrasses. Port Botany | NSW Ports. The construction will also have detrimental negative impacts on the partnership Bayside Council and NSW ports are participating in to restore the biodiversity at Sir Joseph Banks Park a crucial natural refuge. Sir Joseph Banks Park a 16-hectare reserve in Botany Bay which contains some of the last remnants of the endangered Eastern Suburbs Banksia Scrub. It plays a vital role in providing habitats for a diverse range of native wildlife, including the Yellow-tailed black cockatoo, ringtail possum, dwarf tree frog and eastern long-necked turtle. Restoring Botany Bay's Biodiversity - Conservation Volunteers Australia.	as summarised in section 6.27 of the EIS. Approval of the waiver reflects the limited biodiversity values on the site which due to previous industrial development. On the basis of the information gathered from a site inspection and desktop assessment by a qualified ecologist, the thresholds for the biodiversity offsets scheme are not triggered and the project will not have the potential to result in significant impact to threatened communities, populations or species afforded protection under the NSW *Biodiversity Conservation Act 2016* (BC Act) or Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).
SE-75356711			Environmental Impact on Nearby Parks and Waterways: The proposed site is located adjacent to Sir Joseph Banks Park, the largest and most popular park in Botany, and also borders Mill Ponds. The facility's operations would undoubtedly deteriorate the local air quality and could lead to the pollution of these cherished green spaces and waterways. Such environmental degradation not only threatens wildlife and natural habitats but also diminishes the quality of life for residents who rely on these areas for recreation and community activities.	
SE-75371482			It is very concerning that in the Planning Secretary's Environmental Assessment Requirements letter the EHG is currently considering their request to waive the requirement for a Biodiversity Development Assessment Report (BDAR) for the proposal. Given this proposal is for a Waste Management Facility a very through BDAR should be completed to accompany this proposal to ensure all the Biodiversity of the Botany region is protected as the soil and pollutants of the Waste Management Facility will have significant impacts to the area. This construction and operation of the Waste Management Facility will have significant negative impacts on the protected Biodiversity in the area located in Penrhyn Estuary and Foreshore Beach adjacent to Port Botany and situated close to Hale Street. These areas are home to a wide variety of native species	

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			including marine, migratory and shorebirds, mangroves and coastal saltmarsh and seagrasses. The construction of the Waste Management Facility will also have detrimental negative impacts on the partnership Bayside Council and NSW ports have are participating in to restore the biodiversity at Sir Joseph Banks Park a crucial natural refuge. Sir Joesph Banks Park a 16-hectare reserve in Botany Bay which contains some of the last remnants of the endangered Eastern Surburbs Banksia Scrub. It plays a vital role in providing habitats for a diverse range of native wildlife, including the Yellow-tailed black cockatoo, ringtail possum, dwarf tree frog and eastern long-necked turtle.	
SE-74957228	General	Environmental impacts	Traffic aside, the environmental impacts that this waste management facility will have on the surrounding business, schools and residents in my opinion is totally unacceptable.	Impacts to the natural and built environments and social impacts have been assessed using the most recent and accurate scientific data relevant to the site and adopted conservative assumptions so the upper limit of likely impacts could be assessed. In summary, detailed assessment undertaken by appropriate technical specialists demonstrates that on balance the project is unlikely to have significant impact on the receiving environment. On this basis, the project is not considered to be contrary to the public interest. The project has been assessed in accordance with the SEARs, current environmental legislation and regulatory requirements. Where necessary, appropriate management and mitigation measures have been identified to promote environmental conservation or minimise impact to the surrounding community.
SE-75011226			The location of Botany waste project is less than 500m from me and BOTANY PUBLIC SCHOOL. I know also there are so many young children under age of 14 years old resides in this particular spot. These children are very young and the possibility of contamination of the waste are very dangerous for them: eg airborne risk, ground water contamination etc. Please please consider of these children future health, would NSW Goverment be willing to guarantee that there will be no impact for these	

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			childrens health in the future? Would NSW Government willing to be held responsible if there is any proof in the future that this waste project caused harm to these children in the local area?	
SE-75021478			The health and safety of local residents, including children attending Botany Public School, are at risk. The introduction of a large-scale waste management facility could increase exposure to hazardous materials and pollutants, jeopardizing the well-being of the community, especially vulnerable populations like schoolchildren.	
SE-75272489			The Hale Street Waste Management project is too close to Botany Public School and will be a health risk to the children and also to the residents living and working next to the waste facility. Old building materials in Australia very often has asbestos and other toxic materials, and asbestos is often hidden amongst waste material.	
SE-75292458			The docks have been extended causing extra traffic with trucks already queuing along Foreshore Rd waiting to get into the site. We already get excessive dirt from the planes and I feel this facility would cause more airborne dust and dirt being detrimental to the health of local residents if it is allowed. My home, at 18 Erith St., which I bought before the airport noise debacle, is one of the closest to this proposed Waste Management Facility and I think that the stench, especially in summer would be beyond description , and I feel that with the constant background noise of large vehicles and heavy machinery it would make it impossible to have any outdoor social life whatsoever. The increase in traffic through Hale St, which is already beyond capacity in both morning and evening peak hours would cause build up of vehicles trying to exit Chegwyn St as this is a one way Street so all traffic leaving the council carpark plus businesses in that street plus vehicles doing deliveries and pick ups would have difficulty exiting into Hale St.	
SE-75354708			I heavily object to the submission of a waste management facility in the proposed location of Hale street. It's close proximity to waterways (Mill Pond) and a Children's public school playground (Botany Bay School) is reason enough for this facility to not be approved. It's not physically possible for a 100% guarantee that dust and air pollution will be contained within the premises at all times let alone from the	

Submission ID	Category	Sub-category	Comment	Response
			trucks carrying the waste/harmful chemicals during the construction or ongoing running of the facility.	
SE-75356711			Health Concerns: The proposed waste management facility poses significant health risks to local residents, particularly given its proximity – less than 300 meters – from Botany Public School. Within this short distance, there are numerous residential homes directly impacted by potential airborne contaminants and unpleasant odors from the facility. Of particular concern is the handling of construction materials that may contain hazardous substances, such as asbestos, which could severely affect vulnerable populations, including children, the elderly, and individuals with respiratory conditions. The risk of exposure to these pollutants is unacceptable in such a densely populated and sensitive area.	
SE-75361995			We live at very close proximity to the proposed Waste Management Facility and our 7 year old son attends the public school that is also neighbouring the site, and thus would also be negatively affected by this facility, and we feel great distress around this proposal! We're gravely concerned about the hazardous materials that would be dealt with their, the pollution caused by the waste as well as the large amount of vehicles that would be coming in and out of the facility and suburb daily, by the currently contaminated materials there being disturbed and circulated in the air and nearby waterworks, the noise, smells, traffic. Not only would residents nearby be affected but the WHOLE community through the children attending the school being exposed, and the suburb and nearby areas with all the increased traffic and particles carrying over. Botany Public School, Mill Ponds, residents need to be considered and this project needs to be rejected! We need to think about the population and children and the long term effects of these decisions!	
SE-75363973			My other concerns are the materials that will be transferred through this development and the ramifications for over 1000 workers and their health, working in the immediate area, not to mention the houses in Bay Street that back onto the property and Botany Primary School which is in the immediate vicinity.	
SE-75366710			A Waste Transfer Station at the bottom of Bay Street, Botany is inappropriate. It will create huge issues with traffic, pollution (noise/ toxic hazards/ smell/ water pollution to Botany Bay) located so close to residential/ educational areas. A more appropriate location is required as the industrial zone in this region shrinks.	

Submission ID	Category	Sub-category	Comment	Response
SE-75371482			The dust from unloading waste at the Waste Management Facility can cause air pollution and can have a direct impact on the protected airspace of Sydney Airport. In the Planning Secretary's Environmental Assessment Requirements letter it emphasises the importance of effective and genuine community consultation. A comprehensive open and transparent community consultation engagement process must be undertaken during the preparation of the EIS. The community must be provided a description of potential impacts which I don't believe has been achieved as limited if any community consultation has taken place especially in regards to the potential negative health, biodiversity, community and traffic impacts. The Waste Management Facility proposed for Botany is expected to make hazardous particles airborne during the destruction and the operations of the Waste Management facility which is located in close proximity to workers, residents, Botany Public School (approx. 283 students) and St Bernards Catholic Primary School (approx. 236 students) and 11 Botany Childcare facilities.	
SE-75374457			I object to this project because it is too close to the residential area. This poses a threat to the health of our community and it is of utmost importance that this project be stopped immediately.	
SE-75421957			Botany is already a congested suburb - adding more traffic by way of trucks transporting waste materials to an already busy area without proper infrastructure will cause further pressure. The waste transfer station will be in a high density residential area so any hazardous materials are a major concern as well.	
SE-75314723	Project	Building	Is the enclosed building, as I read in the proposal, to keep in the noise and any particles floating in the air.	To align with best practice handling and management of waste material, all material sorting will occur inside the warehouse building as detailed in Section 3 of the EIS.

APPENDIX B

UPDATED SITE PLANS

APPENDIX C

TRAFFIC IMPACT ASSESSMENT

APPENDIX D

FLOOD IMPACT ASSESSMENT

APPENDIX E

INFRASTRUCTURE ASSESSMENT

APPENDIX F

INTEGRATED WATER MANAGEMENT STRATEGY

APPENDIX G

MUSIC MODELLING FILE

APPENDIX H

LANDSCAPE CONCEPT REPORT

APPENDIX I

TEST EXCAVATION METHODOLOGY

APPENDIX J

NOISE AND VIBRATION IMPACT ASSESSMENT

APPENDIX K

SOCIAL IMPACT ASSESSMENT

APPENDIX L

AIR QUALITY IMPACT ASSESSMENT

APPENDIX M

DETAILED SITE INVESTIGATION

APPENDIX N

REMEDIAL ACTION PLAN

APPENDIX O

TRAFFIX PUBLIC SUBMISSION SE-75422990 RESPONSE

APPENDIX P

DCCEEW – WATER TAKE AND LICENSING RESPONSE

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