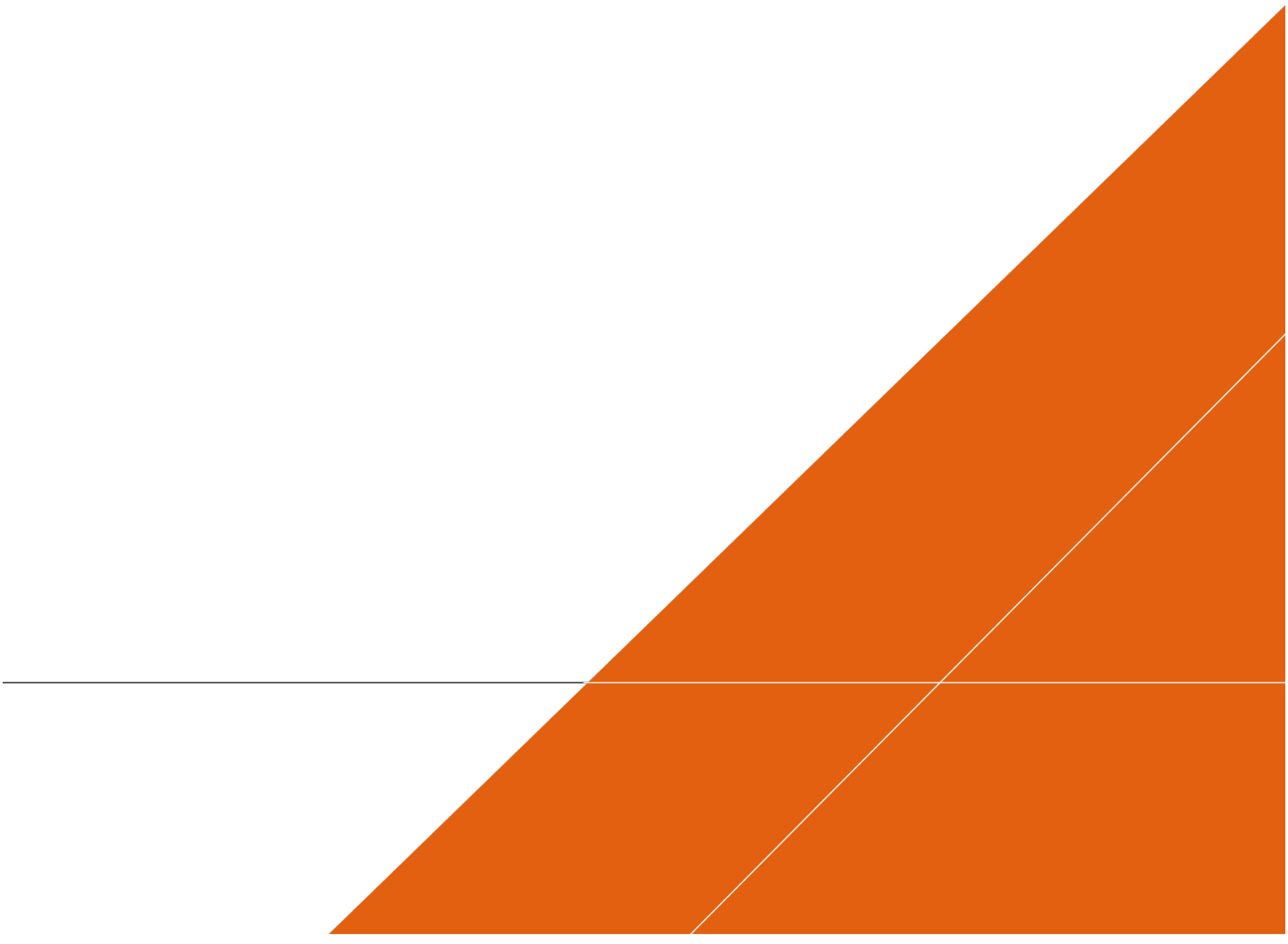
ARCADIS Design & Consultancy for natural and built assets

CHULLORA MATERIALS RECYCLING FACILITY

Response to Submissions

10 JUNE 2021



CONTENTS

APPENDICES

FIGURES

TABLES

GLOSSARY OF TERMS

Term	Definition
AHD	Australian Height Datum
AQIA	Air Quality Impact Assessment
BAM	Biodiversity Assessment Methodology
BATEA	Best Available Technology Economically Achievable
BCA	Building Code of Australia
BDAR	Biodiversity Development Assessment Report
BLEP	*Bankstown Local Environment Plan 2015*
BMP	Best Management Practice
BOA	Building over and adjacent
CBD	Central Business District
CEMP	Construction Environmental Management Plan
Chullora RRP	Chullora Resource Recovery Park
cm	centimetres
Council	Bankstown-Canterbury City Council
DA	Development Application
DPIE	Department of Infrastructure, Planning and Environment
DtS	Deemed-to-satisfy
e.g.	for example
EES	Environment, Energy and Science within the NSW Department of Planning, Industry and Environment
EIS	Environmental Impact Statement
EP&A Act	*Environmental Planning and Assessment Act 1979*
EP&A Regulations	*Environmental Planning and Assessment Regulations 2000*
EPA	NSW Environment Protection Authority
EPL	Environment Protection Licence
FEB	fire engineering brief
FERP	Flood Emergency Response Plan
FES	fire engineered solution
FRNSW	Fire and Rescue New South Wales
GML	General Mass Limit
IPC	Independent Planning Commission
ISEPP	*State Environmental Planning Policy (Infrastructure) 2007*
kL	kilolitres
km	kilometres
L	litres
LGA	Local Government Area
m	metre

Term	Definition
m^3	cubic metres
ML	megalitres
MRF	Material Recycling Facility
MRV	Medium rigid vehicles
MRV	Medium Rigid Vehicle
NCC	*National Construction Code*
NQIA	Noise and Vibration Impact Assessment
NRAR	Natural Resources Access Regulator
NSW	New South Wales
OCC	Old Corrugated Cardboard
OEH	Office of Environment and Heritage
OEMP	Operational Environmental Management Plan
OH&S	Occupational Health and Safety
OIPC	Office of Independent Planning Commission
ONP	Old newspaper
OSD	Onsite detention
OTMP	Operational Traffic Management Plan
PCT	Plant community types
pcu	passenger car units
PIRMP	Pollution Incident Response Management Plan
PM_{10}	Particulate matter - 10 micrometres or less in diameter
$PM_{2.5}$	Particulate matter - 2.5 micrometres or less in diameter
POEO	*Protection of the Environment Operations Act 1997*
RRP	Resource Recovery Park
RtS	Response to Submissions
SEARs	Secretary's Environmental Assessment Requirements
SEE	Statement of Environmental Effects
SEPP 33	*State Environmental Planning Policy No.33 – Hazardous and offensive development*
SES	State Emergency Services
SSD	State Significant Development
State and Regional Development SEPP	*State Environmental Planning Policy (State and Regional Development)*
TCPs	Traffic Control Plans
TEC	Threatened Ecological Community
TfNSW	Transport for New South Wales
The Applicant	Suez Recycling & Recovery Pty Ltd
TIA	Traffic Impact Assessment
TNMS	Traffic Noise Management Strategy

Term	Definition
tpa	tonnes per annum
VRZ	vegetated riparian zone
WSC	Water Servicing Coordinator
WSUD	Water Sensitive Urban Design

EXECUTIVE SUMMARY

Overview

SUEZ Recycling & Recovery Pty Ltd (SUEZ – the Applicant) are seeking approval for the construction and operation of the first phase of the state-of-the-art Chullora Resource Recovery Park (Chullora RRP) as a Materials Recycling Facility (MRF) (State Significant Development (SSD) 10401) (the Proposal). The Proposal would process co-mingled non-putrescible recyclable municipal solid waste (MSW) and dry commercial and industrial (C&I) waste with a material processing capacity of up to 172,000 tonnes per annum (tpa).

The Proposal is located at 21 Muir Road, Chullora (Lot 2 DP 1227526) within the Canterbury-Bankstown Local Government Area (LGA), approximately 18 kilometres (km) west of Sydney Central Business District (CBD) and 10 km east of Parramatta CBD. The key construction components of the Proposal would include:

- Establishment of a hardstand area and internal road network
- Construction of an enclosed MRF shed. The MRF would have a height of approximately 12.3 metres (m) and would comprise three separate areas:
  - A 1,950 m^2 waste receival area
  - A 4,955 m^2 processing area
  - A 2,980 m^2 product storage area
- Installation and commissioning of fixed plant and equipment
- Installation of ancillary infrastructure, including weighbridges, pedestrian overbridge, and fire systems
- Installation and connection of site service infrastructure (electrical, water, sewer, gas and telecommunication services)
- Installation of signage.

The key operational components of the Proposal would include:

- Operation of a MRF 24 hours per day, seven days per week (including processing and waste delivery and collection)
- Product storage.

The Environmental Impact Statement (EIS) for the Proposal was publicly exhibited between 20 August 2020 to 16 September 2020.

This Response to Submissions (RtS) report has been prepared to satisfy the provisions of the *Responding to Submissions Guidelines* (DPIE, 2017) to address submissions raised by government agencies, Council, stakeholders and the public during the exhibition of the EIS. The submissions received included:

- A total of eight submissions from government agencies
- A total of two submissions from public stakeholders, including one organisational and one member of the community.

This RtS also identifies and considers amendments to the exhibited Proposal, now known as the Amended Proposal. The Amended Proposal includes the following components:

- Addition of second outbound weighbridge
- Changes to the fire suppression water strategy with a reduction in size of receival area pits presented in the EIS, the addition of two pits in the processing area and utilisation of a 100 mm bund around the perimeter of the MRF for additional fire water containment
- Minor changes to the location of external doors of the MRF

- Minor changes to the proposed substation design
- Minor internal layout changes.

Submissions

Submissions were received from a total of nine government agencies, comprising the following:

- Canterbury-Bankstown City Council (Council)
- NSW Environmental Protection Authority (NSW EPA)
- Transport for NSW (TfNSW)
- Fire and Rescue NSW (FRNSW)
- Department of Planning, Industry and Environment (DPIE) Water group and Natural Resources Access Regulator (NRAR)
- Environment, Energy and Science (EES) Group within DPIE
- Crown Lands
- Sydney Trains
- Sydney Water.

Of the nine government agencies that provided submissions, only eight provided issues that were required to be addressed. A total of two community and organisational submissions were received.

Government agency and public submissions were provided to SUEZ's team of technical specialists. Based on the content of the submissions, the technical specialists provided responses to the issues raised where relevant.

In response to the submissions received, some mitigation measures have been updated to better avoid, remedy or mitigate the identified impacts. The mitigation measures presented in this RtS represent the final mitigation measures to be incorporated into the conditions for the approval of the Proposal, as required by Schedule 2, Part 3, clause 7(1)(e) of the EP&A Regs.

Amended Proposal

The proposed amendments to the Proposal is anticipated to result in only a minor change in impacts as outlined below:

- Substation design: The revised substation design would require four piles having the potential to result in encountering groundwater. It is not anticipated that the piling would result in additional noise impacts and any identified sensitive receivers
- Second weighbridge: The proposed second outbound weighbridge would be located adjacent to the location of the outbound weighbridge presented in the EIS and would not impact upon the vegetated area in the northwest of the Chullora RRP Site.
- MRF door adjustments: The proposed minor adjustments to door locations are not anticipated to result in any changes to the operational internal or external noise levels.
- Minor internal layout changes: Internal layout changes are not anticipated to result in any additional impacts
- Changes to the fire suppression water strategy: Additional impacts are not anticipated. Revised strategy would provide additional fire water detention capacity than presented in the EIS.

1 INTRODUCTION

SUEZ Recycling & Recovery Pty Ltd (the Applicant) is seeking to establish a state-of-the-art Resource Recovery Park (RRP) at 21 Muir Road, Chullora (Lot 2 DP 1227526). As part of this, SUEZ is proposing to design, build and operate the first phase of the Chullora RRP as a Materials Recycling Facility (MRF) (the Proposal) to process comingled non-putrescible recyclable municipal solid waste (MSW) and dry commercial and industrial (C&I) waste; with a material processing capacity of up to 172,000 tonnes per annum (tpa).

An Environmental Impact Statement (EIS) was prepared to seek approval for the Proposal under Part 4, Division 4.7 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) (SSD 10401). In particular, the EIS was prepared to address, and be consistent with, the Secretary's Environmental Assessment Requirements (SEARs) issued on 20 May 2020 by the Department of Infrastructure, Planning and Environment (DPIE).

The EIS was publicly exhibited between 20 August to 16 September 2020. During this exhibition period submissions were invited from all stakeholders, including members of the community and government agencies. The submissions received included:

- A total of nine submissions from government agencies
- A total of two submissions from public stakeholders, including one organisational and one member of the community.

The submissions received during the public exhibition of the EIS form the subject of this report, known as a Response to Submissions (RtS) and are discussed and addressed in this report.

1.1 Proposal overview

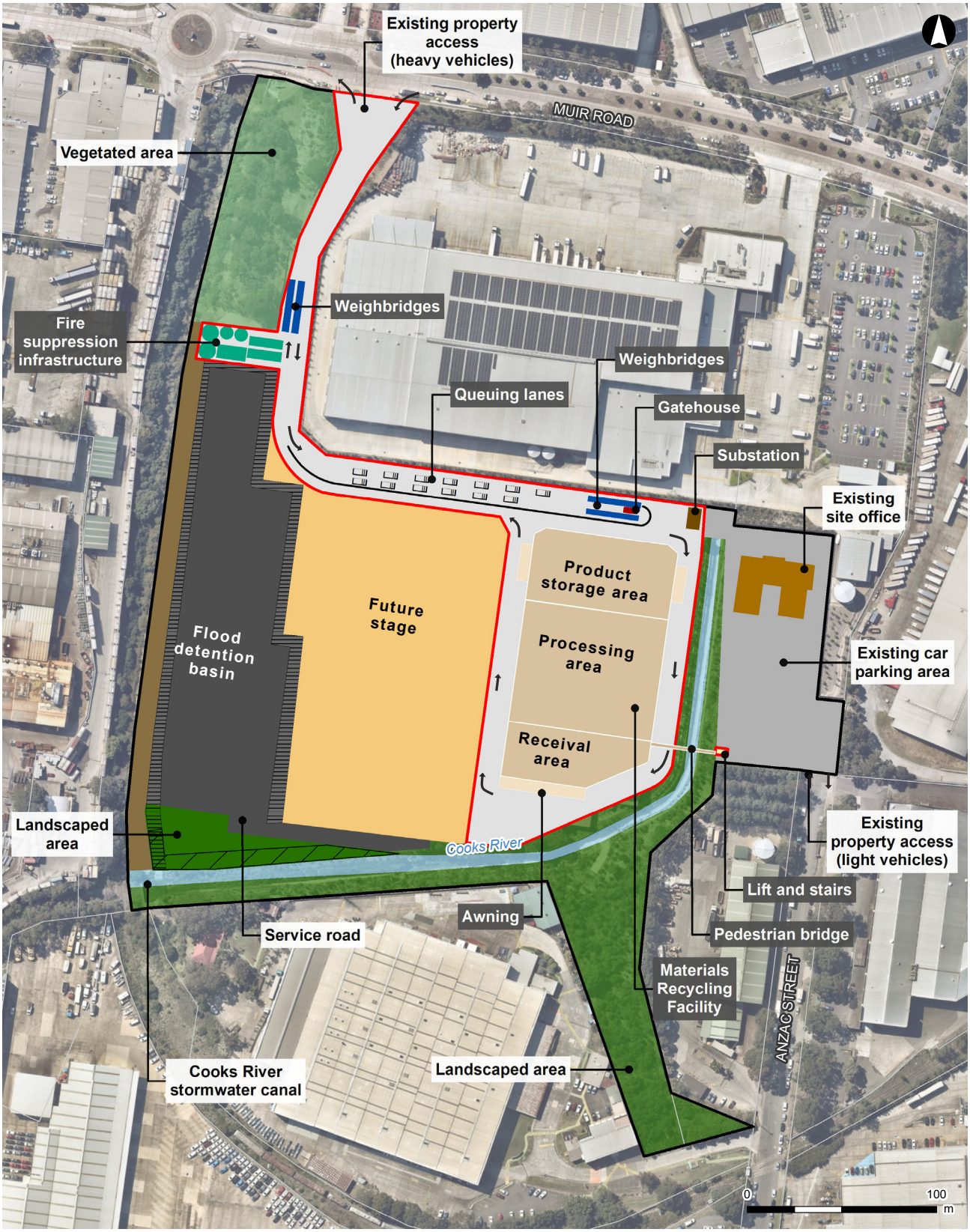
SUEZ is seeking approval, under Part 4, Division 4.7 of the EP&A Act, for the construction and operation of the Proposal. The key components of the Proposal would include:

- Establishment of a hardstand area and internal road network
- Construction of an enclosed MRF shed. The MRF would have a height of approximately 12.3 metres (m) and would comprise three separate areas:
  - A 1,950 m^2 waste receival area
  - A 4,955 m^2 processing area
  - A 2,980 m^2 product storage area
- Installation and commissioning of fixed plant and equipment
- Installation of ancillary infrastructure, including weighbridges, pedestrian overbridge, and fire systems
- Installation and connection of site service infrastructure (electrical, water, sewer, gas and telecommunication services)
- Installation of signage.

The key operational components of the Proposal would include:

- Operation of a MRF 24 hours per day, seven days per week (including processing and waste delivery and collection)
- Product storage.

The Proposal site and MRF is shown in Figure 1-1 and Figure 1-2 below.



LEGEND

- Chullora RRP site boundary
- Proposal site
- Future stage
- Established earthworks
- Hardstand
- Ramp
- Landscaped batter area
- Landscaped area
- Batter
- Flood detention basin
- Property boundary

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Aerial imagery source: nearmap Oct 2020

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Figure 1-1 The Proposal

LEGEND

- Chullora RRP site boundary
- Proposal site
- Future stage
- Existing car parking area
- Hardstand
- Inground fire storage (indicative)
- Mezzanine floor
- Pedestrian bridge
- Push wall
- Shutter
- Walkway

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Figure 1-2 MRF

1.2 Purpose of this report

The purpose of this RtS is to respond to submissions raised by government agencies, Council, stakeholders and the public during the exhibition of the EIS. This RtS has been prepared to satisfy the provisions of the *Responding to Submissions Guidelines* (DPIE, 2017). Each of the submissions received has been collated, analysed and addressed (as relevant).

1.3 Existing site features

The Chullora RRP site was formerly owned by the State Rail Authority of NSW and the Railways Commissioner of NSW from the 1920s to 1996. During this time, the site functioned as a railway depot for the maintenance of electrical train carriages.

In 1997 the Site was acquired by SITA Australia Pty Ltd. (now SUEZ) and from 1997 until 2011, the Site was operated as a Transfer Station, MRF, Garden Organics platform and glass processing shed. In 2017, the MRF component of the previous Chullora RRC, was subject to a fire and subsequently demolished, along with the former glass processing building and other waste infrastructure. Following demolition of the previous Chullora RRC, the Proposal site was used for storage of residential waste bins, maintenance and parking of waste trucks, a heavy vehicle workshop, 5,000 L diesel tank and wash bay to support truck maintenance activities. The Proposal site retains Council approvals for a range of waste management activities, including approval for the operation of a MRF.

In June 2020, SUEZ lodged a development application (DA-366/2020) with Canterbury-Bankstown City Council (Council) for the development of flood mitigation works across the Chullora RRP site (the flood mitigation works). DA-366/2020 seeks approval for early works and site establishment across the Chullora RRP site to provide flood immunity and stormwater infrastructure. In response to requests for further information raised by Council regarding DA-366/2020, minor amendments were made to the design of the flood mitigation works. The flood mitigation works, once constructed, will comprise the existing features of the Proposal site, for the construction and operation of the Proposal. DA-366/2020 was determined on 2 June 2021. The flood mitigation works would include (items underlined represent additional features added since the exhibition of the EIS):

- Site clearance, including:
  - Demolition of temporary structures and general clean-up of the proposed site fill area and flood storage area
  - Removal of tress and other vegetation (within fill area and flood storage area)
  - Crushing the existing concrete slab, temporarily stockpile them and reusing it as a fill material
- Earthworks, including:
  - Cut and fill for the flood storage area
  - Filling the area to the required level using existing crushed recycled concrete material and imported shale/sandstone material
  - <u>Installation of a geofabric liner as part of the Remedial Action Plan across the levelled earthworks area</u>
- <u>Establishment of new landscaped area along the southern boundary of the Site providing a buffer zone to the concrete lined Cooks River stormwater Canal.</u>

Following completion of the flood mitigation works the Proposal site would comprise of a stabilised and levelled established earthworks pad, raised above the one in 100 year flood extent and covered by a capping layer consisting of a geofabric covered by at least 0.5 metres of virgin excavated natural material (VENM) (refer to Figure 1-3). The capping layer will act both as a cap and a marker layer should any future intrusive works take place and mitigate the risk of potential legacy contamination issues.

- The existing site office and car parking area - comprising the 0.7 ha eastern portion of the Proposal site

- A flood detention basin and stormwater infrastructure – comprising approximately 1.7 ha and a capacity of around 22,100 m^3 in the western portion of the Chullora RRP site
- The future development area – comprising the 2.5 ha central portion of the Chullora RRP site
- The Cooks River stormwater canal
- A 1.2 ha landscaping area comprising the southern portion of the Chullora RRP site
- A 0.44 ha vegetated in the north-western corner of the Chullora RRP site.

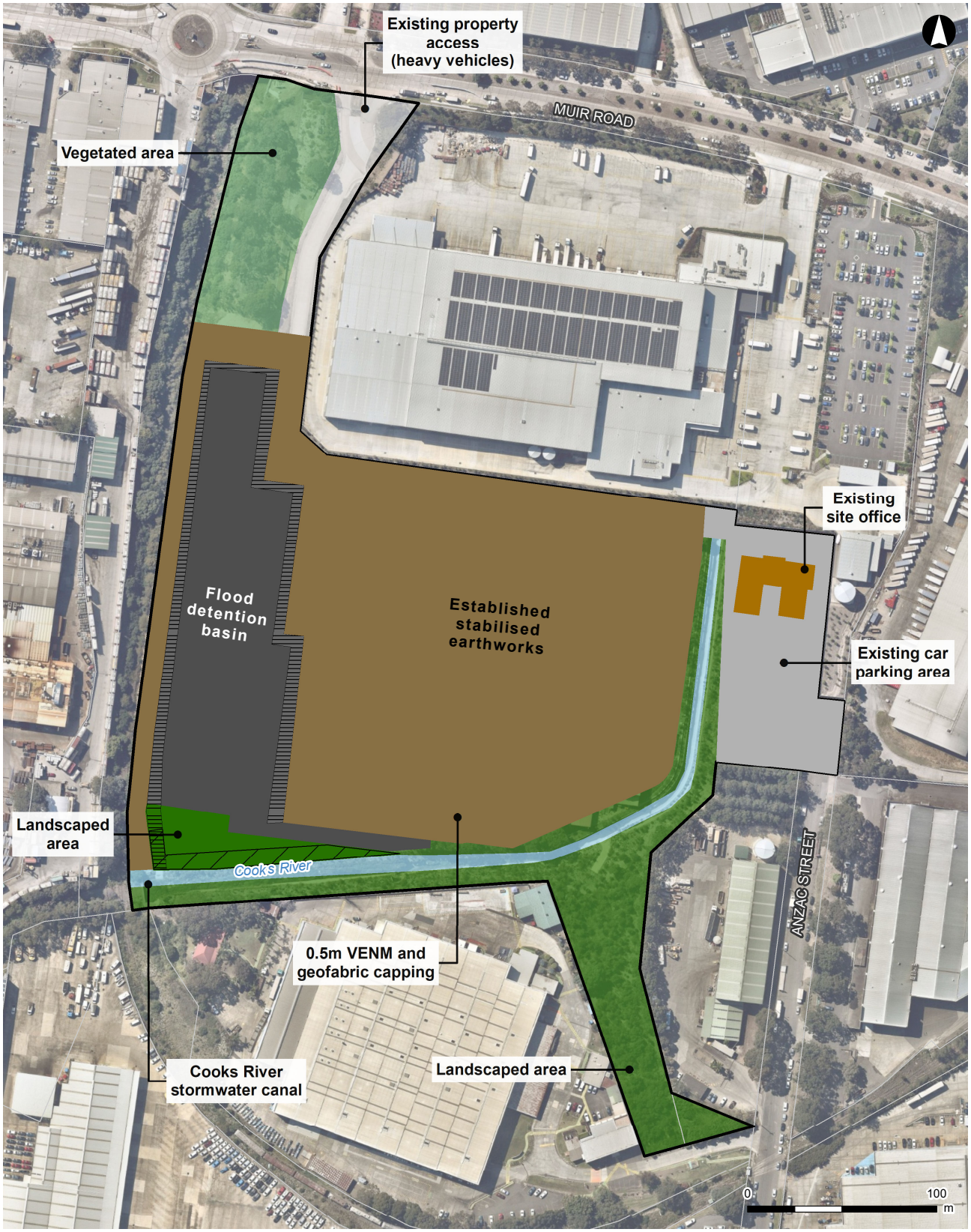

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Figure 1-3 Existing site features

1.4 Statutory approval process

The Proposal is considered State Significant Development (SSD) under Clause 23 (waste and resource management facilities) of Schedule 1 of the *State Environmental Planning Policy (State and Regional Development SEPP)* 2011, which refers to:

> *(3) Development for the purpose of resource recovery or recycling activities that handle more than 100,000 tonnes per year of waste*

The relevant local planning instrument is the *Bankstown Local Environmental Plan 2015* (BLEP 2015). The Proposal site is zoned IN1 General Industrial, which under Division 23 of *State Environmental Planning Policy (Infrastructure) 2007* (ISEPP) is a prescribed zone in which a waste or resource management facility is permissible with consent.

1.5 Structure of this report

The structure of this RtS is as follows:

- **Section 1** – Introduction: provides an introduction to and overview of the Proposal, the relevant statutory approval pathway and the structure of the RtS
- **Section 2** – Exhibition and consultation: provides a description of the consultation which was undertaken as part of the EIS
- **Section 3** – Overview of submissions: provides an analysis of the submissions received during the exhibition of the EIS and identifies the key issues raised
- **Section 4** – Response to government agency submissions: provides a catalogue of submissions received from Government Agencies and their responses
- **Section 5** – Response to community submissions: provides a summary of the community submissions received and responses to each issue raised
- **Section 6** – Amended Proposal: provides an overview of the proposed changes to the Proposal to that presented in EIS as a result of ongoing design development and an assessment of potential additional environmental impacts
- **Section 7** – Revised compilation of mitigation measures: provides a revised list of mitigation measures to include any changes as a result of submissions received or updated environmental assessments of the Amended Proposal
- **Section 8** – Conclusion: provides a summary and conclusion to the RtS.

2 EXHIBITION AND CONSULTATION

The EIS was placed on public exhibition between 20 August and 16 September 2020 in accordance with Section 4.7 of the EP&A Act.

The EIS was also available to the public in electronic format on the DPIE planning portal website during this time.

2.1 EIS consultation

SUEZ has undertaken ongoing consultation with government agencies throughout the preparation of the EIS, including:

- Canterbury-Bankstown City Council (Council)
- NSW Environment Protection Authority (EPA)
- Transport for NSW (TfNSW)
- Fire and Rescue NSW (FRNSW)
- DPIE Water and Natural Resources Access Regulator (NRAR)
- Environment, Energy and Science (EES) Group within DPIE
- Sydney Trains
- Sydney Water.

This consultation was undertaken through a range of mediums, including emails, phone conversations, face-to-face meetings and letter submissions. Feedback from the agencies consulted informed the preparation of the EIS and the project description at the time of EIS preparation.

Key stakeholders and community members were also consulted during the preparation of the EIS by written notification, via telephone, and through SUEZ' website, which provided the key details of the Proposal. A fact sheet containing information about the Proposal and details of the exhibition was provided to surrounding landowners on 28 April 2020 seeking submissions within a two-week period.

2.2 Post Public Exhibition Consultation

SUEZ continues to maintain the email address and information phone line for the Proposal, which were established during the preparation of the EIS. These will remain available for use by the community during the construction phase of the Amended Proposal.

2.3 Next steps

As provided in Section 8A of the State and Regional Development SEPP the criteria for an SSD to be determined by the Independent Planning Commission (IPC) is based on the following:

- More than 50 members of the public having made a submission objecting to the application
- The Council for the area objects to the application
- A political donation disclosure statement has been lodged with the application (i.e. a political donation has been made by the applicant).

During the exhibition of the EIS a total of two public submissions were received, including only one objection. Council did not object to the Proposal. As no political donations were made by SUEZ, no political donations disclosure statement was required to be made. As a result, the Proposal is not required to be determined by the IPC.

3 OVERVIEW OF SUBMISSIONS

A number of government agency submissions and two public submissions were received during the public exhibition of the EIS between 20 August to 16 September 2020.

An overview of the submissions and a summary of the process undertaken to ensure that the submissions have been accurately summarised and appropriately responded to is provided below.

3.1 Submissions received

Submissions were received from a total of nine government agencies, as follows:

- Council
- NSW EPA
- TfNSW
- FRNSW
- DPIE NRAR
- EES Group within DPIE
- Crown Lands
- Sydney Trains
- Sydney Water.

A total of two community and organisational submissions were received.

3.2 Submission response methodology

3.2.1 Technical specialist input to submissions

Government agency and public submissions were provided to SUEZ' team of technical specialists. Based on the content of the submissions, the technical specialists provided responses to the issues raised where relevant.

The information pertaining to relevant responses has been referenced and addressed in the response tables provided in Sections 4 and 5 of this RtS.

3.2.2 Government Agencies

As outlined in Section 3.1, a total of nine government agencies provided submissions, seven of which raised issues to be addressed. Each government agency submission was reviewed and either transcribed in full or summarised to identify the issues raised.

The submissions were then provided to SUEZ' technical specialist team for consideration and preparation of a response where applicable, as discussed in Section 3.2.1 of this RtS.

3.2.3 Public Submissions

As outlined in Section 3.1, a total of two submissions were received from members of the public and organisations, consisting of:

- One community submission received from a member of the public who supported the Proposal and commented that material recovery is important.
- One organisation submission was received from Oriental Merchant Pty Ltd who own and operate a business at 26 Muir Road, Chullora. Key issues raised included:

- The Air Quality Impact Assessment (AQIA), provided in Appendix K of the EIS, does not appropriately consider industrial receivers, including adjoining land uses, or future sensitive receivers
- The Traffic Impact Assessment (TIA), provided in Appendix J of the EIS, does not consider the impacts of heavy vehicles on Muir Road at all times of the day (24/7 operation) including queuing, congestion and emissions. Further modelling is required to be undertaken to establish these impacts
- The Noise and Vibration Impact Assessment (NQIA), provided in Appendix N of the EIS, does not consider the impact of road noise on surrounding industrial land uses.

These submissions were summarised into key environmental aspects and issues using a system of reference numbers. Each submission was analysed and responded to at an issue and aspect level.

The key issues were then provided to SUEZ' technical specialists team for consideration and preparation of a response as identified in Section 5 of this RtS.

4 RESPONSE TO GOVERNMENT AGENCY SUBMISSIONS

Submissions received from government agencies between August and December 2020 have been summarised and responded to in Table 4-1 to Table 4-10.

4.1 Canterbury-Bankstown City Council

A formal submission comprising a letter (dated 16 September 2020) was received from Council. Comments from the submission has been summarised and responded to in Table 4-1.

Table 4-1 Response to government agency submission – Canterbury Bankstown City Council

Aspect	Issue	Response	Reference
Flood Mitigation Works (DA-366/2020)	**Flood affectation and associated studies** The subject site at 21 Muir Road, Chullora is affected by medium and high Stormwater Flood Risk. The affectation covers approximately 80% of the site. Council is currently assessing DA-366/2020 as part of site preparation works that relates to this SSD. The assessment of the DA has raised the following concerns to the applicant: **Flooding – Comparison with Council Flood Study** - Civil Engineering & Overland Flow/Flood Report for Early Works Development Application, Revision C, prepared by Costin Roe Consulting dated 7 May 2020 provides commentary that the study has been validated against Council's Rookwood Road Flood Study. However, it is not clear if specific flood levels, depths and flows were appropriately compared and validated at points of interest. It is requested that the Flood Report be amended to provide tabulated comparisons of the flood levels/depths and flows at points of interest.	As noted in Section 1.2 of the EIS SUEZ lodged development application (DA) 366/2020 with Council on 9 June 2020 for the development of flood mitigation works across the Chullora RRP site. Council provided a request for information to SUEZ on 4 September to which SUEZ provided a response and further information throughout late 2020. DA 366/2020 was determined on 2 June 2021. The flood mitigation works proposed under DA 366/2020 will be undertaken independently to the Proposal and do not form part of the EIS. Notwithstanding this, it is understood that the Flood Report prepared to support DA 366/2020 (Costin Roe, 2020) submitted to Council has been updated and additional flood related information has been provided as requested as part of the provision of further information. Council has received and reviewed the updated Flood Report and have had no further comments or questions. The submitted flood model for DA 366/2020 utilises the previously approved TUFLOW flood modelling associated with the PFD facility (DA-1270/2016 dated 1 August 2017). The use of this model as the base for the new impact assessment was discussed with Council in the initial consultation meetings held with council in first quarter 2020 and later 2019. The 2017 flood model, which was completed and approved for PFD (both pre and post developed), was validated with the Rookwood study via estimated levels and depths. The 2017 model was also peer reviewed and endorsed by BMT WBM (under proponent instigation). It is noted that BMT WBM completed Councils Rookwood Flood Study and were best placed to confirm the modelling suitability.	Section 1.2 of the EIS

Aspect	Issue	Response	Reference
		The public version of the Rookwood study does not provide sufficient accuracy to enable a tabulated comparison. In addition, the current base case model is noted as not directly comparable to the Rookwood Study which was produced prior to PFD Facility.	
	Flooding – Building Representation - Civil Engineering & Overland Flow/Flood Report for Early Works Development Application, Revision C, prepared by Costin Roe Consulting dated 7 May 2020 Figure 7.3 Existing Flood Extent and Levels appears to show the demolished buildings represented by impervious blockages for the Pre-Development scenario. With consideration of the importance of the flood storage within this area, it is noted that the buildings are likely to be pervious to flow and will provide a degree of flood storage. Water can enter through openings such as windows, doorways, vents and vehicle accesses. The primary concern is that the Post-Development flood mitigation measures have been based on a Pre-Development scenario which is not appropriate. It is requested that the Applicant undertake the hydraulic modelling with the building features represented as high roughness elements consistent with Table 9.1. Adopted TUFLOW Element Roughness Values.	Section 9.5 and the Water and Hydrology Impact Assessment (Appendix L of the EIS) provides a detailed assessment of flood risk and the Proposal's impact on flood regimes. As a result of the flood mitigation works to be undertaken under DA 366/2020, including the development of the flood detention basin in the western portion of the Chullora RRP site, there would be an overall reduction in flood levels through the southern portion of the Chullora RRP site and an elimination of overland flows onto Muir Road when compared to the pre-flood mitigation works conditions. Flood modelling undertaken for DA 366/2020 included buildings as blockout and was consistent with the previously approved modelling undertaken for the neighbouring PFD facility. The Proposal site has been designed to divert flows away from permanent structures and into the flood storage basin (to the west) and Cooks River stormwater canal (to the east). The MRF building would be located on a levelled hardstand, raised above the 1-100 year flood level with an additional 0.5m freeboard. Further, the MRF building would comprise high speed roller shutter doors and fire exit doors designed to seal the facility in the case of a fire emergency. In the event of a flood, these doorways would be shut to prevent water entering the building. The raising of the MRF above the 1 in a 100 year flood level means that the risk of flooding to built structures established under the Proposal is considered low.	Section 9.5 of the EIS Water and Hydrology Impact Assessment (Appendix L of the EIS)

Aspect	Issue	Response	Reference
	Flooding – Flood Hazard - Civil Engineering & Overland Flow/Flood Report for Early Works Development Application, Revision C, prepared by Costin Roe Consulting dated 7 May 2020 does not provide sufficient details on the pre-development and post-development flood hazard in accordance with industry guidelines (e.g. NSW Floodplain Development Manual or ARR2019). Council is concerned that there may be adverse flood hazard as a result of the development. This includes areas downstream of the crossings at Muir Road. It is requested that the Flood Report be amended to include flood hazard maps and an assessment of the residual flood risk. Preferably, the flood maps will be provided as per the H1-H6 categories as per Section 7.2.7. General Flood Hazard Curves of ARR2019.	The flood mitigation works to be undertaken under DA 366/2020 will be constructed independently of the Proposal and do not form part of the EIS. Notwithstanding this, it is understood that the Flood Report prepared to support DA 366/2020 (Costin Roe, 2020) submitted to Council has been updated and additional flood related information has been provided as requested as part of the provision of further information. This included updated flood hazard maps outlining residual flood hazard post development utilising the H1-H6 categories. Council has received and reviewed the updated Flood Report and have had no further comments or questions. DA-366/2020 was determined on 2 June 2021. As a result of the flood mitigation works to be undertaken under DA 366/2020, including the development of the flood detention basin in the west of the Chullora RRP site, there would be an overall reduction in flood levels through the southern portion of the Chullora RRP site and an elimination of overland flows onto Muir Road when compared to the pre-flood mitigation works conditions. The raising of the eastern portion of the investigation area means that the MRF would be above the 1- in-100 year flood levels and would therefore not impact flood storage or flows. Notwithstanding the above, as required by mitigation measure WH4, a Flood Emergency Response Plan (FERP) will be developed for operational phase of the Proposal.	N/A
	Flooding – PMF Flooding Assessment - Civil Engineering & Overland Flow/Flood Report for Early Works Development Application, Revision C, prepared by Costin Roe Consulting dated 7 May 2020 is noted to have undertaken the assessment only for the 1% AEP (100 year ARI) flood event. It is noted that the changes to the site may cause impacts in events greater than the 1% AEP up to the PMF. In particular, Council is concerned about adverse changes to evacuation routes and flood-prone sites (i.e. larger PMF extent).	The flood mitigation works to be undertaken under DA 366/2020 will be constructed independently to the Proposal and do not form part of the EIS. Notwithstanding this, it is understood that the Flood Report prepared to support DA 366/2020 (Costin Roe, 2020) submitted to Council has been updated in September 2020 and additional flood related information has been provided as requested as part of the provision of further information. This included a description of emergency response planning and the PMF flood mapping for the pre and post flood mitigation works development conditions. Council has received and reviewed the updated Flood Report and have had no further comments or	N/A

Aspect	Issue	Response	Reference
	It is requested that the Applicant undertakes the PMF assessment and provides the relevant flood level/depth, hazard and afflux maps to support the application.	questions. DA-366/2020 was determined on 2 June 2021. It is noted that a Flood Emergency Response Plan (FERP) is committed to in mitigation measure WH4, which states: *A Flood Emergency Response Plan (FERP) will be developed for operational phase of the Proposal. The FERP would take into consideration, site flooding and broader flood emergency response plans for the Upper Cooks River catchment. The FERP would also include the following:* • *Identification of an area of safe refuge within the Proposal site that would allow people to wait until hazardous flows have receded and safe evacuation is possible* • *Identification of a flood warden and other responsible persons* • *Procedures for warning staff of potential flood danger.* *The FERP will be completed in conjunction with Council and NSW State Emergency Service (SES).*	
	Flood Report – The flood report should include calibration and validation of flood level and flow data with RMSE to show accuracy of the presented flood model. For emergency management plan and configure appropriate evacuation route it is not enough to assess and present only 1% AEP flood event. It is recommended that the flood report should include assessment and present flood map including flood level and flow data up to probable maximum flood (PMF) event. The flood report did not include flood hazard map. It is recommended to provide flood hazard map with updated flood risk categories and flood hazard curves of Australian Rainfall and Runoff guidelines 2019.	The flood mitigation works to be undertaken under DA 366/2020 will be constructed independently to the Proposal and do not form part of the EIS. Notwithstanding this, it is understood that the Flood Report prepared to support DA 366/2020 (Costin Roe, 2020) submitted to Council has been updated and additional flood related information has been provided as requested as part of the provision of further information. This included flood hazard and depth mapping of a PMF flood extent. Council has received and reviewed the updated Flood Report and have had no further comments or questions. DA-366/2020 was determined on 2 June 2021.	N/A
	<u>Biodiversity</u> The northwest corner of the site contains a small patch of Cooks River / Castlereagh Ironbark Forest which is listed as an Endangered Ecological Community (EEC) under the	The flood mitigation works to be undertaken under DA 366/2020 will be constructed independently to the Proposal and do not form part of the EIS. Notwithstanding this, it is noted that SUEZ submitted a response to this issue in a letter to Council dated 22 September 2020 which included further clarification regarding	N/A

Aspect	Issue	Response	Reference
	NSW Biodiversity Conservation Act 2016 (BC Act). Construction and Operational Management Plans should identify appropriate mitigation measures to avoid direct/indirect impacts to the EEC. The Biodiversity Development Assessment Report (BDAR, dated 31 July 2020) assumes that all biodiversity values will be removed (except for the above patch of threatened species community) as part of the development application (DA-366/2020) for site preparation works associated with this SSD. The BDAR cannot be supported by Council until consent has been provided by Council for DA- 366/2020. The outstanding biodiversity related matters that need to be addressed in DA 366/2020 include the following: • The Flora and Fauna Assessment (Arcadis, 2020) does not provide any information regarding the assessment of the human-made structures onsite for microbat habitat. Aerial imagery indicates that many of the structures within the Proposal area are dilapidated and may contain small holes suitable for microbat roosting habitat. Further assessment of these structures is required.	potential biodiversity impacts (Willowtree Planning, 2020). An additional response containing a test of significance for Microchiropteran bats (microbats) on the Proposal site which outlined potential impacts on microbat species was provided in November 2020 (Arcadis, 2020). DA-366/2020 was determined on 2 June 2021. In summary, it is confirmed that fauna surveys undertaken on the Chullora RRP site to support DA 366/2020 included a search for artificial microbat roosts (i.e. man-made structures including culverts). While there was potential for microbat roosting habitat to occur in some existing structures it was considered that the removal of these structures would not have a significant impact on any threatened species including any threatened species of microbat. It was concluded that the Flood Mitigation Works (DA 366/2020) are unlikely to have a significant impact on the Eastern False Pipistrelle, Eastern Coastal Free-tailed Bat, Little Bent-winged Bat, Large Bent-winged Bat, Southern Myotis, Yellow-bellied Sheathtail-bat and Greater Broad-nosed Bat in the site, or wider locality. As a result of the above, the following mitigation measure was added to the flood mitigation works Statement of Environmental Effects (SEE) and would be retained: *A pre-demolition check of buildings will be conducted by a suitably qualified ecologist or wildlife carer to ensure that there are no microbats present. Should any bats be identified, they will be relocated off site prior to demolition.*	
	• It is noted that hollows were only recorded if they were greater than 5cm in width. Whilst this methodology is consistent with the Biodiversity Assessment Methodology, this approach is not adequate to assess the site for some threatened species previously recorded in the locality, including the Little Lorikeet (Glossopsitta pusilla) which has been documented to use hollows that are 3cm in width.	The flood mitigation works to be undertaken under DA 366/2020 will be constructed independently to the Proposal and do not form part of the EIS. Notwithstanding this, it is noted that SUEZ submitted a response to this issue in a letter to Council dated 22 September 2020 which included further clarification regarding potential biodiversity impacts (Willowtree Planning, 2020). DA-366/2020 was determined on 2 June 2021. As noted in this response, fauna surveys involved identification of hollows present on site, including hollows less than 5 cm in	Biodiversity Development Assessment Report (Appendix P of the EIS)

Aspect	Issue	Response	Reference
		diameter. However, the data identified in Council's submission relates to the data collected in vegetation survey plots. Under the Biodiversity Assessment Methodology (BAM) (OEH, 2017), only hollows greater than 5cm in diameter are required to be recorded in this assessment. The methodology followed for the preparation of the Biodiversity Development Assessment Report (Appendix P of the EIS) was in accordance with the BAM (OEH, 2017) and is considered appropriate and in full compliance with the SEARs and associated regulatory requirements for the project.	
	• The 15 m riparian corridor must be re-vegetated with species that conform to the Cumberland Riverflat Forest (plant community type 835). A vegetation management plan (VMP) must be prepared and submitted to Council for approval.	The flood mitigation works to be undertaken under DA 366/2020 will be constructed independently to the Proposal and do not form part of the EIS. As per Schedule 4, Part 2 of the *Water Management (General) Regulation 2018*, the formed concrete channel to the east and south east of the Chullora RRP site (the Cooks River stormwater canal) does not constitute a riparian corridor due to its concrete nature and therefore a 15 m development setback is not applicable. Where the channel is not concrete lined, it may be considered a riparian corridor. A vegetated portion of the canal is present in the south western boundary of the Chullora RRP. The setback in this area is more than 15 metres from the top of bank, which satisfies the requirements of the NRAR Guidelines. Notwithstanding the above, it is noted that SUEZ submitted a response to this issue in a letter to Council dated 22 September 2020 which included further clarification regarding the Cooks River stormwater canal (Willowtree Planning, 2020). An additional area of vegetation totalling 2,190 m^2 is now included in DA 366/2020 at the southern portion of the Chullora RRP site. A copy of the landscape plan is provided in Appendix C. DA-366/2020 was determined on 2 June 2021.	Appendix C of this RtS

Aspect	Issue	Response	Reference
	Further to the issues raised in the DA, a landscape plan was not included in DA- 366/2020 and it was understood that this information is to be supplied as part of the EIS. A landscape plan is required for the landscaped areas outside of the riparian corridor and incorporate species from the Castlereagh Ironbark Forest community (plant community type 725).	The existing Chullora RRP site comprises an extensive landscaping area (approximately 1.2 ha) in the southern portion of the site as described in Section 2.6 of the EIS. This area, as well as the vegetated area in the north-western portion are noted on Figure 1-1 of the EIS. This landscaped area was provided as part of recent channel upgrades which formed part of the PDF facility (carried out under DA 1270/2016). Given the extensive works already undertaken within the channel, no further works are considered necessary. Other existing landscaped areas and existing vegetation provide screening from Muir Road and Anzac Street into the Proposal site. An additional area of vegetation totalling 2,190 m^2 has now been included in DA 366/2020 at the southern portion of the Chullora RRP site. A copy of the landscape plan is provided in Appendix C. Species included in the landscape plan include *Acacia floribunda*, *Bursaria spinosa*, *Melaleuca decora* and *Plectranthus parviflorus.* It is not considered necessary to provide further landscaping on the Proposal site given the extensive existing landscaping present on the Chullora RRP site.	Section 2.6 of the EIS Appendix C of this RtS
	The Biodiversity Assessment Methodology (BAM) candidate species report and Biodiversity Assessment Methodology (BAM) predicted species report are yet to be finalised and submitted to Council.	The BAM Candidate Species Report and Predicted Species Report are provided in Appendix F of the Biodiversity Development Assessment Report (Appendix P of the EIS). It is acknowledged that the Candidate Species Report and Predicted Species Reports note ‘to be finalised’ in the Proposal Details section. As no plant community types (PCTs) or threatened species habitat were identified in the development site, the BAM calculator was not progressed beyond the stage of determining candidate and predicted species, and these lists were included in the BDAR for information purposes and to demonstrate that the likelihood of occurrence and the requirement for any further assessment under the BAM were considered (OEH, 2017). As the BAM calculator cannot be finalised, the candidate and predicted species lists will not be finalised either.	Appendix F of the Biodiversity Development Assessment Report (Appendix P of the EIS)

Aspect	Issue	Response	Reference
Contamination	The EIS identifies that the previous contamination assessments undertaken in 1996, 2016, 2018 and 2019 have indicated that elevated concentrations of contaminants were present in several isolated locations in soil, groundwater and sediments on the Chullora RRP site. The EIS mentions that any potentially contaminated lands will have been excavated or capped as part of the proposed flood mitigation works under DA 366/2020 which is yet to be approved. The Detailed Site Investigation titled "Stage 2 Contamination Assessment – 15 Muir Road, Chullora" prepared by ERM Services Australia Pty Ltd, dated 18 January 2019 needs to be reviewed by a NSW Environment Protection Authority Accredited Site Auditor. A Site Audit Statement and Site Audit Report must be provided to Council from the Site Auditor as part of the development application lodged for site preparation stating that the abovementioned Detailed Site Investigation has sufficiently determined the nature and extent of contamination and advise Council as part of applicant's response to the EIS submissions report which is the next stage. The Site Audit Statement and Site Audit Report must include any restrictions or management.	Chapter 10 of the EIS provides a detailed assessment of the contamination present on the Chullora RRP site and specifically outlines the risk of exposure within the Proposal site boundary. As noted in the EIS, the Stage 2 Contamination Assessment (ERM, 2019) identified several contamination spots present in the underlying fill material including asbestos containing materials and areas of hydrocarbon concentrations exceeding the applicable guideline criteria. None of the contamination identified in this assessment was located within the Proposal boundary, as demonstrated in Figure 10-5 of the EIS. Further to the above, the Proposal will be developed on a hardstand area, raised above the pre-flood mitigation works site levels by further reducing any potential risk to disturb contamination. The potential to disturb any existing contamination on site is considered negligible and is confirmed by the conclusion of the Stage 2 Contamination Assessment (ERM, 2019) which states: *"It is considered that these [contamination] impacts do not preclude the ongoing or future use of the site as a resource recovery centre, or land use consistent with 'Commercial / Industrial D' scenarios."* It is understood that the Site Audit Report (Enviroview, 2016) and Site Audit Statement (NSW EPA, 2016) have been provided to Council in a letter responding to submissions on the flood mitigation works DA (366/2020) dated 22 September 2020 (Willowtree Planning, 2020). The audit concluded that the site was suitable for commercial / industrial land use and was certified by an accredited NSW EPA site auditor on 19 December 2016 (NSW EPA, 2016). The Stage 2 Contamination Assessment (ERM, 2019) has been provided in Appendix A of this RtS. It is noted that a Remedial Action Plan has been prepared for the Chullora RRP site (ERM, December 2020) at the request of Council to support the flood mitigation works DA. The RAP summarises the nature and extent of identified soil contamination based on previous investigations, the extent of remediation required, review of remediation options and identifies a feasible	Chapter 10 of the EIS Appendix A of this RtS

Aspect	Issue	Response	Reference
		remediation strategy to be incorporated into the planned flood mitigation works to address the identified contamination, environmental management requirements and health and safety considerations. A cap and contain strategy has been selected as the preferred remedial approach as this would provide a physical barrier between contamination and receptor and reduce the likelihood of incidental exposure for Site receptors. The capping layer will consist of a geofabric liner covered by at least 0.5 metres of virgin excavated natural material (VENM) across the earthworks area. This capping layer will act both as a cap and a marker layer should any future intrusive works take place and mitigate the risk of potential legacy contamination issues. While construction of the Proposal has the potential to impact upon this cap, the MRF would be constructed on a concrete slab that would act as a cap in itself and therefore not result in an increased ongoing risk of exposure. A draft Long Term Environmental Management Plan (LTEMP) has been prepared for the site to document the residual soil contamination at the site, outline the mechanisms for managing potential risk for future use and potential future intrusive works and also to assist in the long term maintenance of the cap. The plan contains several controls for potentially intrusive works having the potential to come into contact with contaminated material.	
Traffic and Heavy Vehicle Routes	Overall, the applicant seeks to establish a Resource Recovery Park at 21 Muir Road in Chullora and is proposing to develop and operate the first phase of the Chullora RRP as a Material Recycling Facility (SSD-10410) with a material handling capacity of up to 172,000 tonnes per annum. The second phase of the Chullora RRP includes construction and operation of Resource Processing Facility (SSD-10443) with a material handling capacity of 250,000 tonnes per annum. Both the facilities would be operating simultaneously and share site infrastructure following the completion of construction works. The combined material handling capacity of the site is 422,000 tonnes per annum (incoming to the site). It must be acknowledged that all materials that enter the site	A detailed description of waste processing capacity is provided in Section 4.5.10 of the EIS. The Proposal EIS relates only to the impacts associated with the development of a MRF, which has a total material handling capacity of 172,000 tpa. The second phase of the Chullora RRP has a proposed material handling limit of 250,000 tonnes. This means that the cumulative limit for the Chullora RRP site once both stages are operational would be at most 422,000 tonnes per annum and not 844,000 tonnes per annum as proposed in the submission. The second phase of the Chullora RRP does not form part of the Proposal and will be subject to a separate assessment. The Proposal does	Section 4.5.10 of the EIS Section 4.3 of this RtS Traffic Impact Assessment (Appendix J of the EIS)

Aspect	Issue	Response	Reference
	must be removed, either in the form of recycled materials of fuel for the Botany Cogeneration Plant and /or the Resource Processing Facility or somewhere else. Therefore, the total tonnage accessing and leaving the site is significantly higher than 422,000 tonnes per annum and perhaps near 844,000 tonnes per annum.	not include the preparation of fuel for use in the Botany Cogeneration Plant. The TIA (Appendix J of the EIS) (and as clarified in Section 4.3 of this RtS) provides a detailed assessment of the traffic that would be generated by the Proposal associated with its upper material capacity of 172,000 tpa.	
	Traffic Management Plans: Given the amount of material entering and leaving the site, Council considers a simplistic summation of the number of 'trucks' is insufficient, as axle loads can vary greatly dependent on the type of truck and trailer configuration adopted. A detailed Construction Traffic Management Plan and Operational Traffic Management Plan are required to provide details on the types of vehicles being utilised, with the tare and gross vehicle mass determined. This information is then to be incorporated into equivalent axle impact report of the receiving road network to better understand implications on road surfaces.	A detailed description of incoming and outgoing material is provided in Section 4.5.10 of the EIS. A comprehensive assessment of the traffic impact associated with the construction and operation of the Proposal is provided within Chapter 7 and the TIA (Appendix J of the EIS). It is acknowledged that some discrepancies occur within the EIS regarding vehicle types and loads. This has been clarified in in Section 4.3 of this RtS. Maximum loads for each drop-off and product collection vehicle type are provided in Table 4-3. Waste drop-off vehicles (inbound) would comprise walking-floor trailers, curtain sider vehicles, and HRVs (with occasional MRVs). Product collection vehicles (outbound) would comprise semi-trailers, truck-and-dogs and B-doubles. A conservative estimate of vehicle movements has been based on assuming the majority of product would be collected by semi-trailers. The use of B-doubles to collect product would achieve a reduction in number of collections. The EIS has specifically committed to managing traffic through the implementation of a Construction Environmental Management Plan (CEMP), construction traffic control plans and an Operational Environmental Management Plan (OEMP). These mitigation measures are outlined in Table 7-15 of the EIS and include the following: <u>Mitigation measure TA1:</u> *A CEMP, or equivalent, will be prepared to address the specific traffic control requirements during the construction phase of the Proposal. The plan will assess the provision of traffic control measures, including:*	Section 4.5.10 and Chapter 7 of the EIS Traffic Impact Assessment (Appendix J of the EIS) Section 4.3 of this RtS Section 7 of this RtS

Aspect	Issue	Response	Reference
		• *Site signage and road signage* • *Enforcement of speed limits for construction traffic* • *Site-internal pedestrian routes* • *Site induction for construction staff. The induction will include permitted access routes to and from the construction site for all vehicles, as well as standard environmental, occupational health and safety (OH&S), driver protocols and emergency procedures* • *Contracts outlining site traffic rules and traffic management requirements Scheduling of construction vehicles entering and exiting the site via Muir Road.* Mitigation measure TA2: *Site-specific Traffic Control Plans (TCPs) will be prepared as part of the CEMP to outline how construction vehicle manoeuvres will be accommodated in and out of the work site. Temporary traffic controls will be regularly inspected by the contractor to identify potential safety hazards to enable implementation of the correct solutions.* Mitigation measure TA3: *An OTMP will be prepared to address the specific traffic control requirements during the operational phase of the Proposal. The plan will assess the provision of traffic control measures, including:* • *Site signage and road signage* • *Enforcement of speed limits* • *Site-internal pedestrian routes* • *Scheduling processes* Mitigation measures have been revised to ensure that vehicle types used in construction and operation of the Proposal are specifically outlined in the CEMP and OEMP. Revised mitigation measures are detailed in Section 6.	

Aspect	Issue	Response	Reference
	Operational Heavy Vehicle Routes: The Heavy Vehicle Routes must be determined and approved by the relevant authority for accessing the site, given the fact that two facilities will be operating simultaneously sharing the site resources once constructed.	Section 7.2.6 and the Traffic Impact Assessment (Appendix J of the EIS) describe the anticipated distribution of vehicles across key access routes for the Proposal. As noted above, the Proposal EIS (SSD 10401) only considers the impacts related to the construction and operation of the MRF, which would have a material handling capacity of 172,000 tpa. Future SSD applications associated with later stages of the Chullora RRP would be subject to a separate assessment. This assessment would consider the use of shared infrastructure within the Chullora RRP as well as a cumulative assessment of potential traffic impacts considering the traffic generation from all facilities on the Chullora RRP site. Heavy vehicle routes for the Proposal include: • Hume Highway (A22) • Rookwood Road/A6 • Muir Road • Brunker Road. All roads are approved for heavy vehicles up to 25 / 26 metre B-doubles. It is also noted that the OTMP would include vehicle access routes to site and internal network traffic movement. TfNSW have also reviewed this EIS and have provided comment (refer to Section 4.3).	Section 7.2.6 of the EIS Traffic Impact Assessment (Appendix J of the EIS)
Fire Safety Strategy and Fire Safety Design	The Fire Safety Strategy (dated 27 May 2020) proposes that fire safety compliance for the proposed structure will be achieved via Deemed-to-satisfy (DtS) Provisions and Performance solution in accordance with A2.1 (3) of the Building Code of Australia (BCA) 2019. The proposal appears capable of complying with the requirements of the BCA subject to performance solutions at the construction design and approval stage. Council notes that the proposed structure has several non-compliances to BCA which needs to be assessed by a Fire Engineering Solution. The Fire Engineering Solution	A BCA Assessment Report and Fire Safety Strategy are provided in Appendix F and Appendix G of the EIS. Both reports were prepared by C10 Fire Engineers. It is noted that the Fire Safety Strategy was prepared in consultation with FRNSW and in accordance with *Fire Safety Guideline: Fire Safety in Waste Facilities* (FRNSW, 2020). A summary of the extensive consultation undertaken with FRNSW during the preparation of the EIS is presented in Section 6.3.3 of the EIS.	Section 6.3.3 of the EIS BCA Assessment Report (Appendix F of the EIS) Fire Safety Strategy (Appendix G of the EIS)

Aspect	Issue	Response	Reference
	needs to be prepared with an agreement between Fire Safety Engineers, PCA and Fire and Rescue NSW (FRNSW) in accordance with Section 144 of EP&A Regulation 2000. A Fire Engineering Brief and a Fire Engineering Report need to be provided along with FRNSW comments to address the following BCA DtS provisions: • Clause C2.4 • Clause D1.4, D1.5, D1.9, D2.13, D2.14, D2.15, D2.16, D2.17, D2.18 • Clause E1.3 • Clause E1.10 • Clause E4.5, E4.6 • Clause E2.2 The proposed structure must provide certification from a structural engineer to comply with Section B of BCA 2019 amendment 1. Section C, D & E must comply and provide certification from fire safety engineer, fire services engineer and a mechanical engineer. Section J must comply and provide certification from an energy assessor. It is noted that as the facility has previously caught fire and burnt down, therefore part of this information should be provided during the assessment phase and form conditions of consent. This is to provide increased certainty that measures have been incorporated to prevent the facility from catching fire again.	SUEZ is committed to preparing a Fire Engineering Brief and Fire Engineering Report prior to the commencement of construction of the Proposal. This report will address the following DtS provisions of the BCA: • Perimeter Vehicular Access – BCA Clause C2.4 • Exit travel distances and Distance between Alternative Exits – BCA Clause D1.4, D1.5 • Travel via Non-Fire-Isolated Stairways – BCA Clause D1.9 • Elevated Walkways and Platforms – BCA Clause D1.6, D2.13, D2.14, D2.15, D2.16, D2.17, D2.18 • Fire Hydrants – BCA Clause E1.3 • Sprinklers – BCA Clause E1.5, Specification E1.5 • Provision for Special Hazards – BCA Clause E1.10, E2.3 • Smoke Hazard Management – BCA Clause E2.2 • Exit and Directional Signs – BCA Clause E4.5, E4.6 • Smoke Detection – BCA Clause E2.2, Specification E2.2a. It is noted that the Amended Proposal included a minor amendment to the fire water detention strategy within the MRF. Fire water would be contained with the building itself where a greater detention capacity could be achieved. SUEZ also acknowledges and shares Council's concern relating to the fire at the previous Chullora Resource Recovery Centre and is committed to ensuring the Proposal will meet the highest standard of fire safety design.	
Water Quality and WSUD Principles	The subject site is traversed by the Cooks River stormwater canal which consists of a combination of natural channels, naturalised vegetated zones, concrete channels and covered culverts. The EIS currently proposes rainwater harvesting system which would include two above ground 25 kL rainwater tanks for the collection and storage of rainwater to minimise the water demand for the proposal. However,	As noted in Section 9.2.1 of the EIS, the objectives and performance targets for the management of water quality of the Proposal has centred around the Principles of WSUD. This includes the objective to: • Incorporate a WSUD approach into the design of the Proposal.	Section 9.2.1 and Section 9.6 of the EIS

Aspect	Issue	Response	Reference
	there is no discussion on incorporating Water Sensitive Urban Design (WSUD) Principles for a proposal that is progressively planned to contain significantly large portion of impervious surfaces for multiple waste processing facilities within a total site area of over 9 hectares. There are opportunities to introduce permeable and semi permeable surfaces for footpaths and also small rain gardens along service roads throughout the development site to reduce and improve stormwater runoff towards Cooks River. Council recommends the preparation of a Construction Environmental Management Plan (CEMP) and an Operational Environmental Management Plan (OEMP) to identify appropriate Water Sensitive Urban Design Principles in order to improve water quality entering the stormwater canal.	Following exhibition of the EIS, the flood mitigation works DA (DA 366/2020) has been updated to include the establishment of a new landscaped area along the southern boundary of the Site providing a buffer zone to the concrete lined Cooks River stormwater Canal. This increases the total landscaped and vegetated areas of the Chullora RRP site to greater than 20%, all of which would be permeable areas. Internal road networks have primarily been designed to maximise operational efficiency, ensure access by emergency service vehicles (fire trucks) and ensure safety for heavy vehicle drivers and personnel. It is noted that following completion of DA 366/2020, that the site would be covered by a geofabric and VENM capping layer which would minimise the ongoing potential for offsite contamination of surface water and groundwater. As outlined in Section 9.6 of the EIS, SUEZ has specifically committed to incorporating WSUD principles into the CEMP and OEMP and include: <u>Mitigation measure WH1:</u> *A CEMP, or equivalent, will be prepared for the Proposal to minimise water and hydrology related impacts and will include the following:* • *An ESCP prepared in according with the Blue Book (Landcom, 2004) including:* – *Type and location of erosion and sediment controls* – *Inspection and maintenance regimes following rainfall events* • *Construction traffic access points. Construction traffic will be restricted to delineated access tracks, and maintained until construction complete*	

Aspect	Issue	Response	Reference
		Mitigation Measure WH3: *An OEMP, or equivalent, will be prepared for the Proposal to minimise water and hydrology related impacts and will include the management, maintenance and cleaning schedule to ensure that stormwater management system devices are regularly inspected and cleaned.*	
Leachate management	The EIS mentions that accidental spills and leaks may occur during the operation of the proposal and may have the potential to be transported into the Cooks River and groundwater system if left unmanaged. The Scoping Report on the Materials Recovery Facility mentioned that both the stages (Stage 1& 2) of the proposal have potential for spills and leaks from operating machinery to contaminate soil, groundwater and surface water. Additionally, during operation of Stage 1 of the Proposal, waste may generate small volumes of leachate which, if not contained, has the potential to contaminate the surrounding soils, groundwater and surface water bodies. A detailed Operational Management Plan needs to identify specific mitigation measures for appropriate leachate management to prevent any leakages or spills.	The potential for accidental leaks and spills as well as leachate generation is discussed in Section 9.5.1 and the Water and Hydrology assessment (Appendix L of the EIS). The MRF building would be a 'dry' facility with no internal taps and cleaning and washdown would be carried out via high pressure air with no water used. An overhead misting system would be utilised for dust suppression; however, these systems are designed to provide an atomised spray. This means that no moisture would reach the floor of the MRF. Consequently, daily operations would not generate any leachate. On rare occasions water may be used to clean up accidental leaks and spills which may generate small quantities of leachate. In the rare event that leachate or wastewater is generated within the MRF it would be drained to a sump located in the processing area of the MRF. This liquid would be discharged to sewer through a trade waste agreement which would be sought from Sydney Water prior to the commencement of operations. No leachate would be discharged from the MRF via the stormwater system. Further, a Pollution Incident Response Management Plan (PIRMP) will be implemented as part of the OEMP. This is committed to in mitigation measure SC2: *A PIRMP will be prepared for the Proposal to outline the procedure to be followed in the event of a chemical spill or leak during construction and operation. This will include notification requirements and use of absorbent material to contain the spill or leak.*	Section 9.5.1 of the EIS Water and Hydrology Assessment (Appendix L of the EIS)

Aspect	Issue	Response	Reference
Waste Management	Council is of the opinion that the proposed facility would form a key piece of waste infrastructure for enabling Sydney to achieve and promote the objectives of the NSW WARR strategy and assist with providing a cleaner product for remanufactures due to recent export bans and restrictions. The proposal presents an opportunity to form an essential link in the circular economy loop of ensuring quality materials are available for further remanufacture and resource recovery instead of landfill.	It is acknowledged that SUEZ concurs with Councils view that the Proposal would form **a key piece of waste infrastructure** in Sydney and would provide a local solution in response to recent changes in the Australian and global waste markets. Section 3.2 and Section 3.3 of the EIS detail how the Proposal is strategically positioned to respond to current market demands and is consistent with the relevant local, State and Federal planning policies.	Section 3.2 and 3.3 of the EIS
	The EIS includes a brief waste management impact assessment instead of a Waste Management Plan and recommends that a Construction Environmental Management Plan (CEMP) be prepared to provide further details on the appropriate management of waste. In addition to CEMP, Council recommends preparation of an Operational Environmental Management Plan (OEMP) to address detailed waste management requirements during operational phase of the project.	A description of waste management related mitigation measures is provided in Section 19.5 of the EIS. Waste quantities anticipated to be generated by the Proposal are anticipated to be relatively minor. Notwithstanding, waste related impacts will be managed through the implementation of both a CEMP and OEMP. Mitigation measure WM1, commits to the following: *A CEMP and OEMP, or equivalent, will be prepared for the Proposal to minimise waste related impacts and will include the following:* • *Waste prioritisation. Avoidance and reuse of construction materials will have priority over recycling materials. Recycling of materials will have priority over disposal of materials* • *Location and number of collections bins. There will be adequate placement of general waste and recycling bins around the Proposal site, with particular emphasis on the lunchroom and site office* • *Waste management protocols:* – *Management of any identified hazardous waste streams* – *Procedures to manage waste streams, including handling, storage, classification, quantification, identification, and tracking* – *Procedures and targets for reuse and recycling of waste materials*	Section 19.5 and Chapter 22 of the EIS

Aspect	Issue	Response	Reference
		Induction and training procedures for staff. An induction will be provided to relevant staff and sub-contractors outlining their responsibilities with regard to waste management.	
Odour and Dust Management	Ongoing air quality and odour management plans are to form part of any development consent for the development. Council's records indicate a history of odour and dust related complaints from previous waste related uses on the subject site.	Noted. SUEZ is committed to mitigating air quality and odour impacts related to the construction and operation of the Proposal. Air quality and odour impacts are assessed in Chapter 8 and the Air Quality Impact Assessment (Appendix K of the EIS). As described, air quality management features such as a misting system, enclosed processing and transfer areas and sealed haul roads have been included in the proposed design to proactively manage the potential for air quality impacts. Modelling of air quality impacts demonstrated that the Proposal would not significantly affect the surrounding air environment. Odour impacts are expected to be negligible given the Proposal would only accept dry non-putrescible waste streams (i.e. typically these waste streams are non-odourous). It is noted that the previous Chullora Resource Recovery Centre included the receipt of some garden organic material which may have bene the source of previously identified odour. No food or garden organic material is proposed to be received at the MRF. As noted in mitigation measures AQ1 and AQ2, all air quality and odour related impacts will be managed through the implementation of a CEMP and OEMP (or equivalent): <u>Mitigation measure AQ1:</u> *A CEMP, or equivalent, will be prepared for the Proposal to minimise air quality and odour impacts. Where appropriate, mitigation measures to minimise the air quality and odour impacts during construction will be reviewed and considered for incorporation into the CEMP.*	Chapter 8 and Chapter 22 of the EIS Air Quality Impact Assessment (Appendix K of this EIS)

Aspect	Issue	Response	Reference
		Mitigation measure AQ2: *An OEMP, or equivalent, will be prepared for the Proposal that will include measures to minimise air quality and odour impacts. Where appropriate, mitigation measures to minimise the air quality and odour impacts during operation will be reviewed and considered for incorporation into the OEMP.*	
Consistency with LSPS	Council's recently endorsed Local Strategic Planning Statements (LSPS), Connective City 2036 identifies Chullora as an innovation and high technology employment area with a greater focus on innovation and high technology jobs. Council requests that the proposal demonstrate how it achieves the vision of the LSPS for Chullora, as detailed in Council's first submission. It is acknowledged that from a waste resource perspective, the proposal presents opportunities to apply technical and innovation excellence from the onset of site preparation to the construction of the facility and the ongoing operational management of the waste processing facility, including the ongoing maintenance of the proposed building structure. Council requests that the proposal provide detailed information on the technical innovations that the proposed facility would incorporate to demonstrate that the proposed vision of 'State-of-art' is achieved.	The Proposal represents a state of the art waste processing facility, which through the implementation of a pull-through model consisting of the sorting, reprocessing and specified end uses of processed materials, would function as an integrated closed loop solution to the urgent need to manage complex waste streams. This is highlighted by the $8,000,000 in grant funding provided by the NSW EPA's Major Resource Recovery Infrastructure Grants Program. The Proposal received this funding due to the innovative technology and specialised plant and equipment that will maximise the beneficiation of both plastics and fibre during processing which will ensure that high value recycled products are produced for sale to local markets. Historically, recycled paper and cardboard and plastics have been exported to China and other Asian countries; however, due to contamination concerns, these export markets have drastically restricted. As a result, recycled paper and cardboard as well as plastics are being stockpiled or landfilled due to the lack of local processing capacity. To address this, the Proposal has been designed to specifically target the recovery of paper and cardboard as well as plastics to ensure a high rate of waste is diverted from landfill. This will be achieved through the advanced fibre and plastic beneficiation technologies established with the MRF. The bespoke processing equipment utilised in this processing has been selected due to the high resource recovery capability and is described in Table 4-7 of the EIS and include: • Wind sifters • Fibre separation screens • Ballistic separators	Chapter 3 of the EIS

Aspect	Issue	Response	Reference
		• Eddy current separators • Optical sorters. Through the utilisation of fibre and plastics beneficiation technologies, the Proposal would ensure that more than 90 per cent of plastics and fibres would be recovered and sold to local recycled plastic and paper manufacturers. SUEZ are investing in the optical grading of fibre to ensure the efficient identification and sorting of fibrous material. This ensures the MRF produces high specification and quality commodities and therefore represents technical and innovation excellence and therefore supports Council's Connective City 2036 strategy.	
	As discussed previously in this submission, the EIS currently provides no information on the implementation of Water Sensitive Urban Design (WSUD) principles which could have been included on various aspects of the site and the proposed facility, both during construction and operational phase. This information is requested to form part of the application prior to issuing a development consent.	Section 9.2.1 and the Water and Hydrology Assessment (Appendix L of the EIS) outline how WSUD has been incorporated into the design and assessment of the Proposal. The water quality objectives utilised in the assessment of the Proposal were centred around the principles of WSUD. Specifically, the Proposal includes the following design elements that are consistent with the WSUD requirements: • Two 25kL rainwater harvesting tanks capable of supplying approximately 50 per cent of the annual non-potable water demand • Stormwater treatment system which consists of a gross pollutant trap, surface water drainage and bio-retention filter (see Section 9.5.1 of the EIS) • Leachate/wastewater sump within the MRF to collect run-off from potential leaks and spills • Ongoing maintenance of landscaping areas across the Chullora RRP site. The stormwater modelling results presented in Table 4-9 of the EIS demonstrate how the implementation of WSUD measures would result in improved water quality outcomes consistent with the Botany Bay Catchment Water Quality Improvement Plan and that stormwater runoff is not detrimental to the receiving environment.	Section 9.2.1 of the EIS Water and Hydrology Assessment (Appendix L of the EIS)

Aspect	Issue	Response	Reference
	In addition, the surrounding uses within the Chullora industrial area includes food manufacturing service. Council also requests that the proposal and any development consent demonstrate protection of these manufacturing services which may have adverse implications due to the nature of the proposed waste facility	In regard to impacts on surrounding receivers, the EIS has demonstrated that through the features incorporated into the Proposal's design and the implementation of mitigation measures, the Proposal would have minimal impact on surrounding receivers, including food manufacturers. Specifically, the air quality, noise, water quantity and quality and contamination assessments all concluded that there would be minimal impact to the surrounding environment. As outlined in Section 6.4 of the EIS, consultation with surrounding landowners, including food manufacturers, has been undertaken to seek feedback on the Proposal. Notwithstanding, Chapter 22 of the EIS has identified mitigation measures to minimise any impacts from the Proposal on surrounding receivers.	Section 6.4 and Chapter 22 of the EIS

4.2 NSW Environment Protection Authority

A formal submission comprising a letter (dated 22 September 2020) was received from the NSW EPA. Comments from the submission has been summarised and responded to in Table 4-2.

Table 4-2 Response to government agency submission – NSW EPA

Aspect	Issue	Response	Reference
General	Based on the information provided, the proposal will require an Environment Protection Licence (EPL) under the *Protection of the Environment Operations Act 1997* (POEO Act) for the premises-based activities of waste processing (non-thermal treatment) or resource recovery and waste storage under clauses 41, 34 and 42 respectively of Schedule 1 of the POEO Act. The Applicant currently holds EPL no. 5893 for scheduled activities at the premises. If the proposal is approved, the Applicant will be required to either apply for a new EPL or submit a variation application to update the current licence.	It is noted that EPL no. 5893 has recently been suspended. As noted in Section 2.3.1 of the EIS SUEZ will submit an application to either amend the existing EPL or apply for a new EPL prior to the commencement of operations.	Section 2.3.1 of the EIS
	The EPA has reviewed the EIS and confirms that it includes the EPA's requirements for the Environmental Assessment dated 3 December 2020 (Notice No. 1589018).	Noted.	N/A
Noise Management	The EPA recommends the following noise limit and management conditions to ensure noise is managed appropriately at the premises and prevent impact on the community: <u>Traffic Noise Management Strategy</u> A Traffic Noise Management Strategy (TNMS) must be developed by the Applicant, prior to commencement of construction and operation activities, to ensure that feasible and reasonable noise management strategies for vehicle movements associated with the facility are identified and applied, that include but are not necessarily limited to the following:	As detailed in mitigation measures NV1 and NV2, a CEMP and OEMP will be prepared to manage noise and vibration impacts associated with the Proposal. The CEMP and OEMP will provide the framework for the management of all potential environmental impacts, including noise and vibration, resulting from the construction activities. This framework will include measures to minimise noise generation, staff induction and training procedures, complaints handling processes and procedures for managing noise limit exceedances. Specifically, SUEZ has committed to preparing an Operational Traffic Management Plan (OTMP) to manage traffic related impacts, including traffic noise	Section 11.6 and Chapter 22 of the EIS

<table>
<tr><th>Aspect</th><th>Issue</th><th>Response</th><th>Reference</th></tr>
<tr><td></td><td>

Driver training to ensure that noisy practices such as the use of compression engine brakes are not unnecessarily used near sensitive receivers,
Best noise practice in the selection and maintenance of vehicle fleets,
Movement scheduling where practicable to reduce impacts during sensitive times of the day,
Communication and management strategies for non-licensee/Applicant owned and operated vehicles to ensure the provision of the TNMS are implemented,
A system of audited management practices that identifies non conformances, initiates and monitors corrective and preventative action (including disciplinary action for breaches of noise minimisation procedures) and assesses the implementation and improvement of the TNMS,
Specific procedures for drivers to minimise impacts at identified sensitive receivers,
Clauses in conditions of employment, or in contracts, of drivers that require adherence to the noise minimisation procedures and facilitate effective implementation of the disciplinary actions for breaches of the procedures.

</td><td>impacts, during operations. This is outlined in mitigation measure TA3.

A road noise impact assessment is presented in Section 11.5.3 and Appendix N of the EIS. The scale and degree of conditions proposed for the TNMS are not proportionate with the predicted traffic noise impacts associated with the Proposal. Specifically, the NVIA predicted potential increases in road traffic noise levels at sensitive receivers of up to 0.1 dBA and that, in accordance with the NSW Road Noise Policy (RNP) (DECCW, 2011), mitigation of road noise impacts was not warranted.</td><td></td></tr>
<tr><td></td><td><u>Noise Limit Conditions</u>

L6.1 Noise generated at the premises must not exceed the noise limits at the times and locations in the table below.

<table>
<tr><td rowspan="3">Location</td><td colspan="4">Noise Limits in dB(A)</td></tr>
<tr><td>Day</td><td>Evening</td><td>Night</td><td>Night</td></tr>
<tr><td>LAeq(15 minute)</td><td>LAeq(15 minute)</td><td>LAeq(15 minute)</td><td>LAFmax</td></tr>
<tr><td>Any residential receiver</td><td>43</td><td>43</td><td>40</td><td>52</td></tr>
</table>
</td><td>A detailed assessment of predicted operational noise levels is provided in Chapter 11 of the EIS and the Noise and Vibration Impact Assessment (Appendix N). The operational noise levels are predicted to comply with the established noise trigger levels (as presented in the EPA submission) at all nearby receivers for all assessment periods.

As per mitigation measure NV2, an OEMP will be prepared to manage noise and vibration impacts generated by the operation of the Proposal. As part of this, a noise monitoring program will be outlined in both the OEMP and in the future EPL application.</td><td>Chapter 11 and Chapter 22 of the EIS

Noise and Vibration Impact Assessment (Appendix N of the EIS)</td></tr>
</table>

<table>
<tr><th>Aspect</th><th>Issue</th><th>Response</th><th>Reference</th></tr>
<tr><td></td><td>For the purposes of condition L6.1:
a) Day means the period from 7am to 6pm Monday to Saturday and the period from 8am to 6pm Sunday and public holidays.
b) Evening means the period from 6pm to 10pm.
c) Night means the period from 10pm to 7am Monday to Saturday and the period from 10pm to 8am Sunday and public holidays.</td><td>The proposed noise limits are generally consistent with the project noise trigger levels developed in the NVIA and are considered appropriate for the Proposal.</td><td></td></tr>
<tr><td></td><td>L6.3 Noise-enhancing meteorological conditions
a) The noise limits set out in condition L6.1 apply under the following meteorological conditions:
<table><tr><th>Assessment Period</th><th>Meteorological Conditions</th></tr><tr><td>Day</td><td>Stability Categories A, B, C and D with wind speeds up to and including 3m/s at 10m above ground level.</td></tr><tr><td>Evening</td><td>Stability Categories A, B, C and D with wind speeds up to and including 3m/s at 10m above ground level.</td></tr><tr><td>Night</td><td>Stability Categories A, B, C and D with wind speeds up to and including 3m/s at 10m above ground level; or
Stability category E and F with wind speeds up to and including 2m/s at 10m above ground level.</td></tr></table>b) For those meteorological conditions not referred to in condition L6.3(a), the noise limits that apply are the noise limits in condition L6.1 plus 5dB.</td><td>A detailed noise impact assessment is presented in Chapter 11 and the Noise and Vibration Impact Assessment (Appendix N of the EIS). This assessment was developed in accordance with the Noise Policy of Industry (NSW EPA, 2017) which details the appropriate meteorological condition parameters for assessment.
Noise enhancing meteorological conditions were identified in the NVIA. Since nearby sensitive receivers are predominantly located at elevations higher than that of the Proposal site, the default 2 m/s drainage wind, which typically accompanies stability category F, was not considered to be a feature of the area. Therefore, in accordance with the Noise Policy for Industry (NSW EPA, 2017), the noise limits set out in condition L6.1 should not apply in the event that stability category F occurs in tandem with a 2 m/s wind. In such meteorological conditions, the noise limits that should apply are the noise limits in condition L6.1 plus 5 dB.
As per mitigation measure NV2, an OEMP will be prepared to manage noise and vibration impacts generated by the operation of the Proposal. As part of this, a noise monitoring program will be outlined in both the OEMP and in the future EPL application.</td><td>Chapter 11 and Chapter 22 of the EIS
Noise and Vibration Impact Assessment (Appendix N of the EIS)</td></tr>
<tr><td></td><td>L6.4 For the purposes of condition L6.3:
a) The meteorological conditions are to be determined from meteorological data obtained from the meteorological weather station identified as Bureau of Meteorology AWS at Sydney Olympic Park</td><td></td><td></td></tr>
</table>

Aspect	Issue	Response	Reference
	b) Stability category shall be determined using the following method from Fact Sheet D of the Noise Policy for Industry (NSW EPA, 2017): i. Use of sigma-theta data (section D1.4).		
	L6.5 To assess compliance: a) with the LAeq(15 minutes) or the LAmax noise limits in condition L6.1 and L6.3, the noise measurement equipment must be located: i. approximately on the property boundary, where any residence is situated 30 metres or less from the property boundary closest to premises; or where applicable, ii. in an area within 30 metres of a residence façade, but not closer than 3 metres where any residence on the property is situated more than 30 metres from the property boundary closest to the premises; or, where applicable, iii. in an area within 50 metres of the boundary of a National Park or Nature Reserve, iv. at any other location identified in condition L6.1 b) with the LAeq(15 minutes) or the LAmax noise limits in condition L6.1 and L6.3, the noise measurement equipment must be located: i. at the reasonably most affected point at a location where there is no residence at the location; or, ii. at the reasonably most affected point within an area at a location prescribed by condition L6.5 (a).	A detailed noise impact assessment is presented in Chapter 11 and the Nosie and Vibration Impact Assessment (Appendix N of the EIS). The results of this assessment concluded that the Proposal would not generate a significant noise impact at any sensitive receiver. As per mitigation measure NV2, an OEMP will be prepared to manage noise and vibration impacts generated by the operation of the Proposal. As part of this, a detailed noise monitoring program would be outlined in both the OEMP and in the future EPL application. This would include the identification of operational noise limits along with along with details of annual monitoring activities and corrective and preventative actions to be carried out in response to noise limit exceedances.	Chapter 11 and Chapter 22 of the EIS Noise and Vibration Impact Assessment (Appendix N of the EIS)
	L6.6 A non-compliance of conditions L6.1 and L6.3 will still occur where noise generated from the premises is measured in excess of the noise limit at a point other than the reasonably most affected point at the locations referred to in condition L6.5 (a) or L6.5 (b).		

Aspect	Issue	Response	Reference
	NOTE to L6.5 and L6.6: The reasonably most affected point is a point at a location or within an area at a location experiencing or expected to experience the highest sound pressure level from the premises.		
	L6.7 For the purpose of determining the noise generated from the premises, the modifying factor corrections in Table C1 in Fact Sheet C of the *Noise Policy for Industry* (NSW EPA, 2017) may be applied, if appropriate, to the noise measurements by the noise monitoring equipment.		
	L6.8 Noise measurements must not be undertaken where rain or wind speed at microphone level will affect the acquisition of valid measurements.		
	L6.9 All construction work at the premises must be conducted between 7am and 6pm Monday to Friday and between 8am and 1pm Saturdays and at no time on Sundays and public holidays, unless inaudible at any residential premises.	A detailed description of construction activities proposed to be undertaken is outlined in Section 4.4 of the EIS. As noted, construction works would be undertaken during standard construction hours: • 7am to 6pm Monday to Friday • 8am to 1pm Saturday • No works on Sundays or public holidays. In some instances, minor (non-intrusive and audible from a surrounding receiver) construction activities may be conducted outside these hours. As outlined in Section 4.4.6 of the EIS, a CEMP will be prepared for the construction of the Proposal and will include details on construction hours.	Section 4.4 and Section 4.4.6 of the EIS
	<u>Noise Management Plan</u> L6.10 The Applicant must prepare and implement a Noise Management Plan that covers all premises-based activities and transport operations. The plan must include but need not be limited to:	A detailed noise impact assessment is presented in Chapter 11 and the Noise and Vibration Impact Assessment (Appendix N of the EIS). The results of this assessment concluded that the Proposal would not generate a significant noise impact at any sensitive receiver.	Chapter 11 and Chapter 22 of the EIS Noise and Vibration Impact Assessment

Aspect	Issue	Response	Reference
	a) all measures necessary to satisfy the limits in Table L6.1 at all times, b) a system that allows for periodic assessment of Best Management Practice (BMP) and Best Available Technology Economically Achievable (BATEA) that has the potential to minimise noise levels from the facility, c) Effective implementation of identified BMP and BATEA measures, where considered feasible and reasonable, d) Measures to monitor noise performance and respond to complaints, e) Measures for community consultation including site contact details, f) Noise monitoring and reporting procedures.	Noise trigger levels have been established for the Proposal, in accordance with the *Noise Policy for Industry* (NSW EPA, 2017), which would result in acceptable noise impacts. As presented in the NVIA, the predicted operational noise levels comply with the noise trigger levels. Therefore, on the basis that compliance with the noise limits is demonstrated via monitoring conducted in accordance with conditions L6.10, L6.11 and L6.12, assessment of BMP and BATEA is not warranted. As per mitigation measure NV2, an OEMP will be prepared to manage noise and vibration impacts generated by the operation of the Proposal. As part of this, a detailed noise monitoring program would be outlined in both the OEMP and in the future EPL application.	(Appendix N of the EIS)
	L6.11 The Applicant must prepare and implement a detailed Construction Noise Management Plan (CNMP), prior to commencement of construction activities, that includes but is not necessarily limited to: a) identification of each work area, site compound and access route (both private and public) b) identification of the specific activities that will be carried out and associated noise sources at the premises and access routes, c) identification of all potentially affected sensitive receivers, d) the construction noise and vibration objectives identified in the Environmental Assessment, e) assessment of potential noise and vibration from the proposed construction methods (including noise from construction traffic) against the objectives identified in the Environmental Assessment,	As detailed in Section 11.4 and the Noise and Vibration Impact Assessment (Appendix N of the EIS), noise impacts related to the construction of the Proposal are expected to be negligible considering the limited earthworks and excavations required. Notwithstanding, a CEMP will be prepared to manage noise impacts resulting from construction activities. This has been committed to in mitigation measure NV1: Mitigation measure NV1 *A CEMP, or equivalent, will be prepared for the Proposal to minimise noise and vibration impacts and will include the following:* • *Consideration of the selection of plant and processes with reduced noise emissions* • *A complaint handling process*	Section 11.4 and Chapter 22 of the EIS Noise and Vibration Impact Assessment (Appendix N of the EIS) Section 6 of the RtS

Aspect	Issue	Response	Reference
	f) where the objectives are predicted to be exceeded an analysis of feasible and reasonable noise mitigation measures that can be implemented to reduce construction noise impacts, g) description of management methods and procedures and specific noise mitigation treatments that will be implemented to control noise and vibration during construction, including the early erection of any operational noise control barriers, h) procedures for notifying residents of construction activities that are likely to affect their noise and vibration amenity, i) measures to monitor noise performance and respond to complaints.	• *Induction and training procedures for construction staff. An induction will be provided to relevant staff and sub-contractors outlining their responsibilities with regard to noise* • *Procedures for approval of any works undertaken outside of standard hours.* As noted in Section 7 of this RtS mitigation measure NV1 has been revised to include the following additional elements to be addressed in the CEMP: • Identification of each work area, site compound and access route (both private and public) • Identification of the specific activities that will be carried out and associated noise sources at the premises and access routes • Identification of all potentially affected sensitive receivers the construction noise and vibration objectives • Assessment of potential noise and vibration from the proposed construction methods (including noise from construction traffic) against the noise and vibration objectives • Were the objectives are predicted to be exceeded an analysis of feasible and reasonable corrective actions that can be implemented to reduce construction noise impacts • Description of management methods and procedures and specific noise mitigation treatments that will be implemented to control noise and vibration during construction and operation • Procedures for notifying residents of construction activities that are likely to affect their noise and vibration amenity	

Aspect	Issue	Response	Reference
	Definition of Noise Terms • Noise Policy for Industry - the document entitled "Noise Policy for Industry" published by the NSW Environment Protection Authority in October 2017. • Noise – 'sound pressure levels' for the purposes of conditions L6.1 to L6.8. • LAeq (15 minute) - the value of the A-weighted sound pressure level of a continuous steady sound that, over a 15 minute time interval, has the same mean square sound pressure level as a sound under consideration with a level that varies with time (Australian Standard AS 1055:2018 Acoustics: description and measurement of environmental noise). • LAFmax – the maximum sound pressure level of an event measured with a sound level meter satisfying Australian Standard AS IEC 61672.1-2013 Electroacoustics - Sound level meters - Part 1: Specifications set to 'A' frequency weighting and fast time weighting.	Noted.	N/A
Waste Management	The EPA recommends waste limit and management conditions to ensure waste is received and managed appropriately at the premises. Limiting the type and amount of waste received, as well as ensuring all activities are undertaken within the building, are considered appropriate measures to ensure impacts to the environment and the community, particularly in relation to dust, noise and odour, are prevented. Recommended Conditions: • The only waste permitted to be received at the premises is paper, cardboard, glass, plastic and metal. • A maximum of 172,000 tonnes of waste is permitted to be received at the premises in a 12-month period. • All waste unloading, processing and storage must be undertaken within the building. • The height of baled material must not exceed four (4) metres or four (4) bales high.	Section 4.2 of the EIS provides a summary of the indicative throughput per waste stream. SUEZ is in agreement that the total throughput would not exceed 172,000 tpa, with the exact throughput from each source varying subject to market conditions in that year and different Council's recycling collection regimes. Section 4.5.1 of the EIS highlights the waste streams intended to be accepted under the Proposal. Co-mingled waste would comprise a large portion of the incoming waste material. This waste stream may contain a variety of materials depending on the source and therefore may not solely contain paper, cardboard, glass, plastic and metal materials. Any waste not accepted at the facility would be considered non-conforming waste and would be managed in accordance with the procedures listed in Section 4.5.5 of the EIS. As noted, these procedures will be incorporated into an OEMP.	Section 4.2 and 4.5 of the EIS

Aspect	Issue	Response	Reference
		Section 4.5 of the EIS, all unloading, processing and storage activities would be undertaken within the fully enclosed MRF shed. Storage activities would occur within the product storage area of the MRF and would comprise multiple bays for the storage of saleable commodities. Bays would be utilised for stacking of baled material, with up to four bales stacked on top of each other (to a height of four metres).	
	The EPA will also require the Applicant to nominate an authorised amount, which is to be the maximum amount of waste permitted on the premises at any one time under a licence. The authorised amount will be considered and determined as part of the EPL application/variation process and added as a condition on the EPL.	The storage capacity of the Proposal is detailed in Section 4.5.4 of the EIS. Incoming waste would be stored within the receival area of the MRF and processed products would be stored within the product storage area of the MRF. Due to the variations in density of both incoming material and products, a low density (best case) and high density (worst-case) scenario has been considered in the assessment of the Proposal's storage capacity and is presented in Table 4-8 and Table 4-9 of the EIS. Incoming waste would be stored in one of three tipping bays. The combined capacity of the bays would equate to a total waste storage capacity of 4,150 m^3 with waste stockpiled to a height of up to a maximum of four metres. Under a high-density scenario, this would equate to approximately 2,000 tonnes at any one time. The MRF would produce up to 12 different commodities which would be stored within product storage bays within the product storage area, prior to transportation off site. The combined storage capacity of these bays would equate to 4,940 m^3. Under a high-density scenario, this would equate to approximately 3,000 tonnes at any one time. Therefore, the total storage capacity of the Proposal is proposed to be at most 5,000 tonnes at any one time. Storage capacity limits would be confirmed as part of the Environmental Protection Licence (EPL) application.	Section 4.5 of the EIS

Aspect	Issue	Response	Reference
Dust and Odour Emissions	The EPA recommends dust and odour emission management conditions to ensure potential dust and odour from activities at the premises are managed appropriately and prevent impacts to the environment and the community. It is possible that some of the non-putrescible waste brought to the facility may be contaminated with residues that can give rise to odour if not removed promptly for disposal. The EPA recommends the conditions of approval include a requirement to remove any such waste within 48 hours. The EPA also considers it prudent to include a dust and odour audit requirement as a condition of approval to ensure formal implementation of all necessary management measures once the facility is operational, and to benchmark these against industry best practice to ensure ongoing control.	As outlined in Section 8.5 of the EIS, a number of air quality management features have been incorporated into the design of the MRF to minimise the potential for air quality impacts, including: • Handling of incoming waste and outbound materials within a fully enclosed shed. The only exception to this would be loading of curtain-sider vehicles adjacent to the product storage area. The nature of curtain siders is that, while the truck would be outside the MRF building, loading occurs via an open side of the vehicle from within the shed therefore minimising potential air quality impacts outside the shed. Further, loading areas would be covered by awnings providing a degree of protection from adverse weather conditions. • Major transport points within the processing area are fully enclosed as part of the fixed plant	Section 4.55, Section 8.5 and Chapter 22 of the EIS
	<u>Recommended Conditions:</u> • Trucks entering and leaving the premises must have their loads covered, except during material inspection, unloading and loading. • All operations and activities occurring at the premises must be carried out in a manner that prevents and minimises the emission of air pollutants from the premises. • The premises must be maintained in a manner that prevents and minimises the emission of air pollutants. • Idling of trucks must be minimised where possible. • Any waste received that is received at the premises that is determined to be unsuitable for processing due to the presence of putrescible material must be removed from the premises within 48 hours of receipt.	iii. All transfer points and screens are misted to minimise dust generation iv. All haul roads are sealed. Protocols for dealing with non-conforming waste are detailed in Section 4.5.5 of the EIS. As outlined, key procedures for managing non-conforming waste will be outlined in the OEMP, and may include: v. Spot checking and inspection of incoming waste prior to its stockpiling or processing to minimise the risk of non-conforming material in processed and recovered waste materials vi. Recording details of non-complying waste deliveries vii. Review of the waste processing systems in-line with EPA requirements	

Aspect	Issue	Response	Reference
	• By 6 months from the commencement of operations approved by the development consent, the proponent must submit a dust and odour audit report to the EPA addressing the following: a) A summary of any dust and/or odour complaints received, and actions taken to reduce odour emissions where complaints are verified; b) Benchmark the design and management practices at the facility against industry best practice for minimising dust and/or odour emissions. This should include, but not be limited to, fast close roller doors c) Using the results of (a) and (b), if it is identified that the facility requires additional dust and/or odour mitigation measures the report must include: i. Proposed mitigation works and/or management practices to ensure that dust and/or odour is minimised as far as is practicable; and ii. A timetable for the implementation of these works.	viii. Increasing the level of appropriate and safe recycling of waste in a sustainable and environmentally sound manner. As outlined in Section 11.5 and Chapter 22 of the EIS, measures for managing potential dust and odour impacts will also be detailed in the OEMP and are committed to in mitigation measure AQ2: *Mitigation measure AQ2* *An OEMP, or equivalent, will be prepared for the Proposal that will include measures to minimise air quality and odour impacts. Where appropriate, mitigation measures to minimise the air quality and odour impacts during operation will be reviewed and considered for incorporation into the OEMP.*	
Stormwater management and preventing water pollution	The EPA recommends conditions that prevent discharge of leachate from the MRF building to the stormwater system. The EPA will not allow a licensed discharge point to waters from the premises.	As noted in Section 9.5.1 of the EIS, leachate and wastewater quantities that would be generated by the Proposal are expected to be negligible as all processing activities would be carried out within an enclosed, 'dry' facility. In the rare event that leachate or wastewater is generated within the MRF it would be drained to a sump located in the processing area of the MRF. This potentially sediment laden or oily wastewater would be discharged to sewer through a trade waste agreement which would be sought from Sydney Water prior to the commencement of operations. No leachate would be discharged to the stormwater system.	Section 9.5.1 of the EIS
Operational Environmental	The EPA recommends that an Operational Environmental Management Plan (OEMP), as described in the EIS, be developed and submitted to the EPA with the EPL application or EPL variation application. The	Mitigation measures TA3, AQ2, WH3, SC3, NV2, SE1, AH1, GG1, VA1 commit to the development of an	Chapter 22 of the EIS

Aspect	Issue	Response	Reference
Management Plan	OEMP should be implemented at the premises and the EPA may incorporate aspects of this plan into conditions on the EPL.	OEMP to manage the following environmental concerns during the operation of the Proposal: • Traffic and access • Air quality • Water and hydrology • Soils and contamination • Noise and vibration • Socio-economic • Aboriginal and Non-Aboriginal heritage • Greenhouse gases • Visual amenity. This OEMP can be provided as an accompaniment to the future EPL application.	
Fire Guidelines	The EPA recommends that the Applicant ensure it complies with the Fire safety guideline: Fire management in waste facilities 2020 published by Fire & Rescue NSW. The EPA notes that this has been considered as part of the EIS and fire safety requirements should be included in the site OEMP.	A detailed assessment of the Proposal's ability to comply with FRNSW's *Fire Safety Guideline – Fire safety in waste facilities* (FRNSW, 2020) and *Fire safety guidelines: Access for Fire Brigade Vehicles and firefighters* (FRNSW, 2019) is provided in Section 4.3.5, the Fire Safety Strategy (Appendix G of the EIS) and The Fire Systems Design (Appendix H of the EIS).	Section 4.3.5 of the EIS Fire Safety Strategy (Appendix G of the EIS) Fire Systems Design (Appendix H of the EIS)

Aspect	Issue	Response	Reference
Standards for managing construction waste in NSW	Waste facilities that meet the definition of a construction and demolition (C&D) waste facility under clause 90B of the Protection of the Environment Operations (Waste) Regulation must comply with the Standards for managing construction waste in NSW published by the NSW EPA. Based on the EIS, the EPA it appears that construction waste, as defined by s90A of the Protection of the Environment Operations (Waste) Regulation 2014, will not be received at the premises. If this is incorrect, the Applicant should inform DPIE and the EPA prior to determination of the proposal.	As noted in Section 1.1, the Proposal is only proposing to process co-mingled non-putrescible MSW and C&I waste. Construction and demolition waste would not be received at the Proposal site.	Section 1.1 of the EIS
Emergency response	The Applicant will be expected to prepare maintain and implement as necessary, a current Pollution Incident Response Management Plan (PIRMP) for the licensed premises. They must develop their PIRMP in accordance with the requirements in Part 5.7A of the POEO Act and the POEO Regulations.	As noted in Section 12.6 and Chapter 22 of the EIS, a PIRIMP will be prepared as part of the OEMP; as committed to in mitigation measure HR2: *A PIRMP and Emergency Response Plan will be prepared for the Proposal to outline the procedure to be followed in the event of an incident or emergency during construction and operation. The PIRMP will be developed collaboratively with the construction contractor and site operator and in consultation with the NSW Police force, NSW Fire Brigade and the Ambulance Service of NSW. Emergency response and incident management protocols will cover the following types of emergency or incident:* • *Workplace health and safety* • *On-site spills or leaks* • *Off-site discharges* • *Hazardous materials / dangerous goods* • *Flooding* • *Road incidents, including incidents involving the transport of dangerous or toxic goods* • *Fire.* *The PIRMP will include:*	Section 12.6 and Chapter 22 of the EIS

Aspect	Issue	Response	Reference
		• *Training and induction protocols. Induction will be provided to all staff and subcontractors outlining their responsibilities in the event of an emergency or incident* • *Incident response in the case of a fire, including:* – *Measures to prevent fires on site and for the management of hot loads (fires occurring in transfer vehicles)* – *Treatment of fires as an emergency. The extinguishment of fires will take precedence over normal operations* – *Protocols for the containment and disposal of fire water* – *Maintenance requirements for firefighting equipment. All firefighting equipment will be regularly maintained in accordance with the equipment maintenance specification. Equipment will be replaced as necessary* • *Notification requirements and timeframes to applicable authorities in the event of an emergency or incident* • *Non-confirming waste protocols* • *The location and content of a spill kit. A spill kit will be present on site at all times* *Review regimes of the PIRMP. Regular reviews and updates will be made for the PIRMP as required.*	

4.3 Transport for NSW

A formal submission comprising a letter (dated 8 September 2020) was received from Transport for NSW. Comments from the submission has been summarised and responded to in Table 4-5.

A number of points of clarification were raised by Transport for NSW regarding the type and size of trucks that would deliver and collect product and the tonnages of product that would be transported per vehicle. It is acknowledged that some minor discrepancies occur within the EIS regarding vehicle types and loads.

It is noted that during the Proposal development and design phase, the understanding of vehicle types that would enter the facility and the operation of the MRF was gradually refined. In response to queries raised by TfNSW, and to ensure accuracy within the description of the vehicle fleet that would access the Proposal site SUEZ has carried out a detailed review of their existing truck fleet and the nature of vehicle types that would be likely to deliver and collected materials to/from the MRF. This review comprised the following:

- Review and update of the description of the inbound and outbound vehicle types
- Review and update of the maximum payloads and general mass limit (GML) for the updated vehicle types
- Review and confirmation of the truck trip generation numbers for the updated vehicle types.

Updated swept path assessments for the clarified truck types are provided in Appendix B of this RtS. The description of vehicle types and movements provided below supersedes the description provided within the EIS.

Vehicle types

Inbound

As noted above SUEZ have completed a detailed review of their existing waste collection truck fleet as well as a review of third-party vehicle types that could be utilised to deliver waste to the Proposal stie. The review identified a range of different truck types that would be used to deliver waste to the MRF that can broadly be categorised as follows:

- Two-axle medium rigid vehicle (MRVs)
- Three or four axle heavy rigid vehicles (HRVs)
- Walking floor trailers (articulated semi-trailers)
- Curtain siders (articulated semi-trailers).

Section 4.5.6 of the EIS identifies that MRVs and articulated semi-trailers would be used to deliver waste to the receival area of the MRF. Upon review SUEZ identified that it is likely that triple or four axle HRVs would likely also be used to deliver waste to the Proposal site.

Outbound

As noted above during the Proposal development and design phase, the understanding of vehicle types that would enter the facility and the operation of the MRF was gradually refined. An early understanding of the operation of the facility had assumed that heavy rigid vehicles (HRV) would be used for product collection. However, the final design and operation of the facility assumed, as noted in Section 7.5.1, of the EIS, that product collection vehicles (outbound) would comprise:

- Semi-trailers (19 m) carrying 40 ft shipping containers
- Truck and dogs (19 m)
- B-double trucks (25 m).

Payloads and general mass limit (GML) per truck

For the purpose of clarification, truck types and sizes have been confirmed in Table 4-3 below. It is noted that the truck loads identified in Table 4-11 of the EIS refer to the General Mass Limit (GML) rather than the payload per vehicle. The GML was identified rather than the payload in response to Council's request for aspects to be considered within the EIS (letter dated 15 May 2020) which included the following statement '*Given the amount of material entering and leaving the site it is not considered that a simplistic summation of the number of "trucks" is sufficient, as axle loads can vary greatly dependent on the type of truck and trailer configuration adopted*'. Axle loads were consequently identified in Section 4.5.6 of the EIS, however it is acknowledged that this was not clearly articulated. It is noted that all axle loads would be below the limits identified in the National Heavy Vehicle Regulator – Common Heavy Freight Vehicle Configurations.

The GML and the payload assumed within each truck type is present in Table 4-3 to provide clarity regarding these figures. This table has also been prepared with the updated vehicle types (as per above). It is noted that the truck fleet that will be utilised by SUEZ includes a variety of vehicle types (makes and models) each with their own specific GML and payload. Further, many vehicles accessing the site will be owned and operated by third parties. SUEZ have endeavoured to provide accurate information to the extent possible, however due to the nature of the facility and uniqueness of individual truck models the below is an 'indicative' representation of truck payloads with the GMLs presented as the maximum regulatory mass under GML identified in the National Heavy Vehicle Regulator – Common Heavy Freight Vehicle Configurations.

Table 4-3 Truck types and payloads – clarified

Truck types	Waste to be transported	General Mass Limit[1]	Payload (m^3 or tonnes) used within assessment
Inbound			
Medium rigid vehicles (2 axle-rigid trucks)	Co-mingled recyclables	15 tonnes	Up to 16 m^3 (10 m^3 used within assessment)
Heavy rigid vehicles (HRVs) (3-axle rigid truck)	Co-mingled recyclables	22.5 tonnes	Up to 30 m^3 (24 m^3 used within assessment)
Walking floor trailers (3-axle semi-trailers)	Co-mingled recyclables Cardboard	24 tonnes	Up to 90 m^3 (82 m^3 used within assessment)
Curtain-sider (3-axle semi-trailers)	External plastics	24 tonnes	Up to 90 m^3 (82 m^3 used within assessment)
Outbound			
Semi-trailers (19m) carrying 40 ft shipping containers (5-axle semi-trailers)	• OCC • ONP • Mixed paper • Steel • Aluminium • HDPE natural	39 tonnes	22.5 tonnes

Truck types	Waste to be transported	General Mass Limit[1]	Payload (m^3 or tonnes) used within assessment
	• HDPE colour • PET clear • Mixed plastic • Residual material		
B-doubles (7-axle B-double)	• OCC • ONP • Mixed paper • Residual materials	55 tonnes	32 tonnes (not used in assessment)
Truck-and-dogs (3-axle truck and 3-axle dog trailer)	• Glass	42.5 tonnes	30 tonnes

Note 1: As per the National Heavy Vehicle Regulator – Common Heavy Freight Vehicle Configurations

Truck trip generation calculations

Further clarification has been sought by Transport for NSW regarding how vehicle numbers have been calculated. Further description of how vehicle numbers have been calculated is provided below. Further, as noted above, SUEZ have clarified the truck types that would access the facility. Truck trip generation calculations have been reviewed in light of the clarified vehicle types.

Inbound traffic analysis

Waste incoming to the facility will be largely mixed, unprocessed waste. Incoming waste trips have been calculated based on volume rather than weight due to its mixed composition. An average density of 180 kg/m^3 has been adopted for incoming waste. Waste would be brought in by a combination of the following vehicle types with the below assumed capacities (refer to Table 4-3):

- Medium rigid vehicles (MRVs) - up to 16 m^3 with 10 m^3 adopted for the assessment
- Heavy rigid vehicles (HRVs) – up to 30 m^3 capacity with 24 m^3 adopted for the assessment
- Walk-in-floor trailers – up to 91 m^3 capacity with 82 m^3 capacity adopted for the assessment
- Curtain-siders – up to 91 m^3 capacity with 82 m^3 capacity adopted for the assessment.

The EIS determined the truck trip generation numbers using the following assumptions. It is noted that many of these assumptions have been considered highly conservative and are likely resulting in an overestimation of truck trip generation numbers. These assumptions have been reviewed (and updated accordingly) against the clarified vehicle types (described above):

- It was assumed vehicles would only deliver waste during weekdays (5 days). Approval is being sought for 24-hour operations, 7 days per week and it is likely that some loads would arrive on weekends, reducing daily and peak day traffic volumes
- Plastics (approximately 7,000 tpa) would predominantly be delivered by curtain-siders. SUEZ would have operational control over these deliveries, which would largely be scheduled outside of peak road network hours.
- Cardboard (approximately 50,000 tpa) would be predominantly delivered by walking-floor-trailers. Similar to plastics, SUEZ would have operational control over these deliveries, which would largely be scheduled outside of peak road network hours.
- As noted in Section 4.5.10 of the EIS it has been assumed that approximately half of the co-mingled deliveries would be carried out by walking-floor-trailers. However, for the purpose of the

EIS (and updated) assessment a 60/40 split has been adopted to conservatively assume a greater proportion of vehicles would comprise smaller MRVs/HRVs. SUEZ would aim to prioritise the use of larger vehicles to the greatest extent possible (likely achieving a greater than 50 per cent ratio), which would reduce overall vehicle numbers

- Of the proportion of co-mingled delivers not completed by walking-trailers, the majority would be delivered by triple-axle HRVs (as per the review of SUEZ' vehicle fleet). While double-axle MRVs and four-axle HRVs may also be used upon occasion, these vehicle types make a small proportion of SUEZ' vehicle fleet. The assessment has been based on a 24m^3 capacity within HRVs.

The truck trip generation calculations utilised within the EIS were based on comparable assumptions to those listed above. Trips were calculated using the following:

$$Tonnes\ per\ day\ \times\ avergae\ waste\ denisty \div avergae\ verhicle\ capacity$$

A typical delivering profile across the 24 hours period was used to identify the number of trucks per hour. Using the above confirmed assumptions and the clarified vehicle composition, a comparison of the updated truck trip generation numbers and those utilised in the EIS is presented below. As shown in Table 4-4 the updated assessment is either consistent or lower than the number of vehicles presented within the EIS. The results of the traffic impact assessment presented in the EIS are therefore considered appropriate, and provide an over-estimation of potential trip generation numbers.

Table 4-4 Comparison of update trip generation assessment and EIS assessment

	Calculation method	Clarified daily trucks	Daily trucks assessed within the EIS
Co-mingled waste	• Average daily volume of co-mingled waste (approx. 2,457 m^3) • Peak daily volume of co-mingled waste (approx. 3,194 m^3) • Approximately 40% of deliveries would be made by walking-floor-trailers • Average capacity of walking-floor trailers 82m^3 • Average capacity of MRVs/HRVs 24 m^3	Average day • 21 walking-floor-trailers • 31 MRV/HRVs Peak day: • 27 walking-floor-trailers • 41 MRV/HRVs	Average day: • 23 walking-floor-trailers • 38 MRV/HRVs Peak day: • 25 walking-floor-trailers • 52 MRV/HRVs
Cardboard	• Average daily volume of co-mingled waste (approx. 1,068 m^3) • Peak daily volume of co-mingled waste (approx. 1,389 m^3) • Average capacity of walking-floor trailers 82 m^3	Average day • 13 walking-floor-trailers Peak day: • 17 walking-floor-trailers	Average day: • 15 walking-floor-trailers Peak day: • 20 walking-floor-trailers
Plastics	• Average daily volume of co-mingled waste (approx. 150 m^3) • Peak daily volume of co-mingled waste (approx. 194 m^3) • Average capacity of curtain-sider 82m^3	Average day • 2 walking-floor-trailers Peak day: • 2 walking-floor-trailers	Average day: • 2 walking-floor-trailers Peak day: • 4 walking-floor-trailers

	Calculation method	Clarified daily trucks	Daily trucks assessed within the EIS
Total		**Average day: 67** **Peak day: 87**	**Average day: 78** **Peak day: 101**

Outbound vehicles

Once waste has been processed and separated into products a more accurate density can be prescribed broken down by waste stream. Based on the nature of the waste types the limiting factor for transportation in outbound vehicles would largely be the maximum payload of the vehicle (rather than the volume capacity). Outbound vehicle movements were therefore calculated based on the payload of the vehicles (shown in Table 4-3). To assess a worst-case scenario the following conservative assumptions were made:

- It was assumed vehicles would only collect product during weekdays (5 days). Approval is being sought for 24-hour operations, 7 days per week and it is likely that some product would be collected on weekends, reducing daily and peak day traffic volumes
- It has been assumed that, with the exception of glass, that all outbound trips would be made via semi-trailers carrying 40 ft shipping containers with a payload of 22.5 tonnes. However, OCC, ONP, mixed paper and residual waste may be transported by B-double vehicles (curtain-siders) which could carry up to 32 tonnes, reducing the total number of vehicle trips.

Based on the above, the trip generation calculations have been considered highly conservative. Minor alterations to the adopted payloads would not materially alter the resulting traffic movements.

The analysis prepared for the EIS used the correct vehicle types and capacities. No comparison against the confirmed vehicle types and the EIS reported numbers has therefore been required.

Summary and conclusions

In order to provide TfNSW, and other stakeholders, further clarity regarding vehicle types and movements associate with the Proposal SUEZ have completed a detailed review of their internal and external truck fleet that would be likely to utilise the MRF. As a result of this review the following clarifications have been made:

- The inbound and outbound vehicle types have been refined and amended to better reflect the vehicle types that would access the MRF
- The GML and payload for each vehicle type (based on maximum GML and typical loads) have been provided for the amended vehicle types
- The trip generation numbers have been reviewed using the amended vehicle types and assumptions from the EIS and compared with the EIS truck trip generation numbers, concluding that the EIS has likely over-estimated the total vehicle numbers and that the assessment remains appropriate
- Truck trip generation numbers have been confirmed to be highly conservative, on the following basis:
  - It was assumed vehicles would only collect product during weekdays (5 days). Approval is being sought for 24-hour operations, 7 days per week and it is likely that some product would be collected on weekends, reducing daily and peak day traffic volumes
  - The assessment has been based on a greater percentage of smaller vehicles accessing the site than would likely be the case (i.e. 60/40 split MRVs & HRVs compared to articulated vehicles for inbound, and no use of b-doubles for outbound)
  - Vehicle numbers within the EIS were rounded up on an hourly basis, increasing the total anticipated vehicle numbers above the actual likely daily totals (refer Table 4-4 for a comparison between actual modelled vehicle numbers and those assessed within the EIS)

Table 4-5 Response to government agency submission – TfNSW

Aspect	Issue	Response	Reference
Traffic and access	The Environmental Impact Statement (EIS) makes various mentions of a 'triple axle rigid vehicles' (p.72 and 77) and 'triple axle vehicles' (p.73), including that a triple axle rigid vehicle can carry a 40 foot container. A rigid vehicle cannot carry a 40 foot container. It is requested that the proponent clarify what is meant by a 'triple axle vehicle'.	As per the clarification above SUEZ has carried out a detailed review of their existing truck fleet and the nature of vehicle types that would be likely to deliver and collect materials to/from the MRF. The purpose of this review as to confirm/update the vehicle types and trip generation calculations. Following this review the truck types that would access the Proposal site, have been confirmed to comprises • Inbound: – Two-axle medium rigid vehicle (MRVs) – Three or four axle heavy rigid vehicles (HRVs) – Walking floor trailers (articulated semi-trailers) – Curtain siders (articulated semi-trailers) • Outbound: – Semi-trailers (19 m) carrying 40 ft shipping containers – Truck and dogs (19 m) – B-double trucks (25 m) Table 4-3 provides further detail on the truck types and their typical axle configurations. Shipping containers would be carried by articulated semi-trailers.	Section 4.5.6 and Chapter 7 of the EIS Traffic Impact Assessment (Appendix J of the EIS)
	The EIS states that the average load per truck for a B-double is 55 tonnes (p.72). B-doubles cannot carry this much payload. The approximate payload for a 25/26m B-double at GML is 42.5 tonnes, and at HML is 48 tonnes. It is requested that the proponent clarify the payload for a B-double.	As per the clarification above SUEZ has carried out a detailed review of their existing truck fleet and the nature of vehicle types that would be likely to deliver and collect materials to/from the MRF. Table 4-3 provides detail on the truck types, their GML and an average payload. The GML identified for each truck type has been derived from the National Heavy Vehicle Regulator's *Common Heavy Freight Vehicle Configurations* (2019) A typical B-double payload of 32 tonnes has been assumed, although B-doubles were not considered in the assessment of vehicle movements within the TIA.	Section 4.5.6 and Chapter 7 of the EIS Traffic Impact Assessment (Appendix J of the EIS)

Aspect	Issue	Response	Reference
	The EIS states that the average load per truck for a Heavy Rigid Vehicle (HRV) is 22.5 tonnes (p.72). A rigid truck cannot carry this much payload. It is requested that the proponent clarify the payload for a HRV.	As per the clarification above SUEZ has carried out a detailed review of their existing truck fleet and the nature of vehicle types that would be likely to deliver and collect materials to/from the MRF. Table 4-3 provides detail on the truck types, their GML and an average payload. The GML identified for each truck type has been derived from the National Heavy Vehicle Regulator's *Common Heavy Freight Vehicle Configurations* (2019) The maximum GML for HRVs would be 22.5 tonnes. An average payload has been assumed for HRVs of up to 24 m^3 (approx. 4.3 tonnes of co-mingled recyclables) however the payload would differ depending on the number of axles and specifications for individual vehicles.	Section 4.5.6 and Chapter 7 of the EIS Traffic Impact Assessment (Appendix J of the EIS)
	The EIS states that the average load per truck for a truck and dog is 42 tonnes (p.72). Only PBS truck and dog combinations such as Quad Dog and Quin Dog will get close to 42 tonnes payload and it also requires access to at least the PBS. It is requested that the proponent clarify the specific truck and dog combination and payload.	As per the clarification above SUEZ has carried out a detailed review of their existing truck fleet and the nature of vehicle types that would be likely to deliver and collect materials to/from the MRF. Table 4-3 provides detail on the truck types, their GML and an average payload. The GML identified for each truck type has been derived from the National Heavy Vehicle Regulator's *Common Heavy Freight Vehicle Configurations* (2019) The maximum GML for a truck-and-dog would be 42.5 tonnes. A payload of 30 tonnes has been assumed for truck-and dogs.	Section 4.5.6 and Chapter 7 of the EIS Traffic Impact Assessment (Appendix J of the EIS)
	The EIS states that product collection vehicles (outbound) would comprise triple-axle rigid vehicles, truck-and-dogs and B-doubles (p.73). However elsewhere in the EIS, it states that to provide a conservative estimate of traffic numbers it has been assumed that product would be collected by semi-trailers and truck-and-dogs only (p.136) Request the proponent clarify whether B-doubles have been used to estimate traffic numbers.	As per the response above, it is acknowledged that there are some inconsistencies in the definition of certain truck types throughout the EIS and TIA (Appendix J of the EIS). As noted in the response above, product collection vehicles (outbound) may include: • Semi-trailers (19 m) carrying 40 ft shipping containers • Truck and dogs (19 m) • B-double trucks (25 m). The GML and payload for these vehicles is presented in Table 4-3. As B-doubles have a larger payload (32 tonnes) than the other truck types, they were not considered in the traffic movement assessment presented in the TIA (Appendix J of the EIS) in order to provide an overly conservative appraisal of trip	Section 4.5.6 and Chapter 7 of the EIS Traffic Impact Assessment (Appendix J of the EIS)

Aspect	Issue	Response	Reference
		generation numbers. Instead, it was assumed that that all outbound trips would be made via semi-trailers carrying 40 ft shipping containers with a payload of 22.5 tonnes. This was to ensure a conservative assumption was presented and worst-case impacts were accounted for. The use of B-doubles in the traffic movement assessment would result in a reduction in the number of collections specified within the EIS.	
	The proposed vehicle movements shown in table 4-12 of the EIS (p. 73). It is requested that the proponent clarify how these movement numbers were calculated, and whether the inflated payloads for the various heavy vehicle types were used as part of this calculation. It is also requested that the proponent clarify whether there are any service vehicle trips generated by the development as Table 4-12 only shows inbound waste and outbound product movements in the proposed vehicle movements' figures.	A description of how trip generation figures have been determined is provided above this response table. A review of the trip generation numbers has been completed to compare the trip generation numbers using the updated/confirmed truck types against those presented in the EIS (refer Table 4-4), concluding that the assessment completed within the TIA was appropriate (and has presented a highly conservative assessment). To summarise, a description of how vehicle numbers have been calculated is provided below. <u>Inbound traffic analysis</u> Waste incoming to the facility will be largely mixed, unprocessed waste. Incoming waste trips have been calculated based on volume rather than weight due to its mixed composition. As calculations were based on volume, use of different vehicle payloads (in tonnes) for each vehicle type would not alter the inbound traffic generation numbers. An average density of 180 kg/m^3 has been assumed for incoming waste. Waste would typically be brought in by a combination of the following vehicle types with the below assumed capacities: • Medium rigid vehicles – up to 16 m^3 capacity • Heavy rigid vehicles – up to 30 m^3 with a 24 m^3 capacity adopted for the assessment • Walk-in-floor trailers – up to 90 m^3 capacity with 82 m^3 capacity adopted for the assessment • Curtain-siders – up to 90 m^3 capacity with 82 m^3 capacity adopted for the assessment.	Traffic Impact Assessment (Appendix J of the EIS)

Aspect	Issue	Response	Reference
		Daily vehicle numbers were derived based on the average and peak daily tonnages of waste (converted to m^3) and the daily distribution of vehicles. To assess a worst-case scenario the following conservative assumptions were made: • It was assumed vehicles would only deliver waste during weekdays (5 days). Approval is being sought for 24-hour operations, 7 days per week and it is likely that some loads would arrive on weekends, reducing daily and peak day traffic volumes • As noted in Section 4.5.10 of the EIS it has been assumed that approximately half of the co-mingled deliveries would be carried out by walking-floor-trailers. However, for the purpose of the EIS (and updated) assessment a 60/40 split has been adopted to conservatively assume a greater proportion of vehicles would comprise smaller MRVs/HRVs. SUEZ would aim to prioritise the use of larger vehicles to the greatest extent possible (likely achieving a greater than 50 per cent ratio), which would reduce overall vehicle numbers • Of the proportion of co-mingled delivers not completed by walking-trailers, the majority would be delivered by triple-axle HRVs (as per the review of SUEZ' vehicle fleet). While double-axle MRVs and four-axle HRVs may also be used upon occasion, these vehicle types make a small proportion of SUEZ' vehicle fleet. The assessment has been based on a 24 m^3 capacity within HRVs. <u>Outbound vehicles</u> Once waste has been processed and separated into products a more accurate density can be prescribed, broken down by waste stream. Based on the nature of the waste types the limiting factor for transportation in outbound vehicles would largely be the maximum payload of the vehicle (rather than the volume capacity). Outbound vehicle movements were therefore calculated based on the payload of the vehicles (shown in Table 4-3). To assess a worst-case scenario the following conservative assumptions were made:	

Aspect	Issue	Response	Reference
		• It was assumed vehicles would only collect product during weekdays (5 days). Approval is being sought for 24-hour operations, 7 days per week and it is likely that some product would be collected on weekends, reducing daily and peak day traffic volumes • It has been assumed that, with the exception of glass, that all outbound trips would be made via semi-trailers carrying 40 ft shipping containers with a payload of 22.5 tonnes. However, OCC, ONP, mixed paper and residual waste may be transported by B-double vehicles (curtain-siders) which could carry up to 32 tonnes, reducing the total number of vehicle trips. Based on the above, the trip generation calculations have been considered highly conservative. Minor alterations to the adopted payloads have not materially altered the resulting traffic movements. Occasional access may be required to the site from service vehicles, however these trip generation numbers would be negligible and could be scheduled outside of peak hours.	
	A Green Travel Plan is not considered necessary at this time however, TfNSW recommends that the proponent consider providing end of trip facilities to encourage and support active transport. In addition, TfNSW recommends that the site should reassess the necessity of a Green Travel Plan should the site operations expand requiring an significant increase in employee numbers.	Noted. Section 4.3.1 of the EIS describes the internal layout of the MRF building. A small internal administrative area would be located in the south eastern portion of the receival area. This area would include showers and change rooms that could be used by employees as 'end-of-trip' facilities. As noted in Section 7.5.5 of the EIS, ten bicycle parking bays would be provided in the site office in a secure locker room (or equivalent space) to encourage active transport. This represents a significant proportion of the total workforce proposed for the MRF. The Proposal would also be served by bus services, including: • 925 – East Hills to Lidcombe via Bankstown • M92 – Sutherland to Parramatta.	Section 4.3.1 and Section 7.3.6 of the EIS Traffic Impact Assessment (Appendix J of the EIS)

Aspect	Issue	Response	Reference
		Bus stops used by the above services are provided along Rookwood Road, Hume Highway and Muir Road and are only a short walking distance from the Proposal site. Bus routes in the vicinity of the Proposal site are shown in Figure 7-8 of the EIS.	

4.4 Fire and Rescue NSW

A formal submission comprising a letter (dated 11 September 2020) was received from FRNSW. Comments from the submission have been summarised and responded to in Table 4-6.

Table 4-6 Response to government agency submission – FRNSW

Aspect	Issue	Response	Reference
General	It is recommended that advice and considerations contained within FRNSW's *Fire Safety Guideline – Fire safety in waste facilities* be addressed. Advice and recommendations contained within the guideline have been developed to enable FRNSW to adequately manage an incident at such facilities.	A detailed assessment of the Proposal's ability to comply with FRNSW's *Fire Safety Guideline – Fire safety in waste facilities* (FRNSW, 2020) and *Fire safety guidelines: Access for Fire Brigade Vehicles and firefighters* (FRNSW, 2019) is provided in Section 4.3.5, the Fire Safety Strategy (Appendix G of the EIS) and the Fire Systems Design (Appendix H of the EIS). In accordance with these standards, the following fire systems have been incorporated into the Proposal: • High hazard sprinkler systems • Thermal cameras • Alarm system and automatic shutdown system for fixed plant and equipment in the event a fire is detected via thermal cameras • Deluge systems where openings between compartments within the MRF are located (e.g. where conveyors extend through the fire walls between the receival area and the processing area) • Connection to water mains • Fire hose reels • Fire hydrants • An underground ring main around the MRF • Two hydrant tanks (432,000 L total) and two sprinkler tanks (1,104,000 L total) • Fire hydrant and sprinkler boosters	Section 4.3.5 of the EIS Fire Safety Strategy (Appendix G of the EIS) Fire Systems Design (Appendix H of the EIS)

Aspect	Issue	Response	Reference
		• Fire control centre and pump room • Inground isolation values and backflow preventer • Emergency exit points. It is noted that the Amended Proposal includes changes to the fire suppression water strategy with a reduction in size of receival area pits presented in the EIS, the addition of two pits in the processing area and utilisation of a 100mm bund around the perimeter of the MRF for additional fire water containment. The revised strategy results in an increased storage capacity while better utilising the design of the facility. No additional impacts are therefore anticipated.	
	It is recommended that advice and considerations contained within FRNSW's *Fire Safety Guideline – Emergency Vehicle Access* be addressed. This is required such that FRNSW are able to safely access all parts of the site where an incident may occur.	A detailed assessment of the Proposal's ability to comply with FRNSW's *Fire Safety Guideline – Fire safety in waste facilities* (FRNSW, 2020) and *Fire safety guidelines: Access for Fire Brigade Vehicles and firefighters* (FRNSW, 2019) is provided in Section 4.3.5, the Fire Safety Strategy (Appendix G of the EIS) and the Fire Systems Design (Appendix H of the EIS). As noted in the Traffic Impact Assessment (Appendix J of the EIS), a swept path analysis was also carried out to confirm the manoeuvrability of fire trucks to access the fire services on the Proposal site. Revised swept path analysis has been undertaken for clarified truck types and is provided in in Appendix B of this RtS. On the advice of FRNSW, a bypass gate has been provided along the queuing lanes upon entrance of the Proposal site to provide fire vehicles direct access to the MRF without vehicles having to pass over weighbridges. The gate will be clearly signposted as an emergency vehicle access gate. Consultation undertaken with FRNSW during the design of the Proposal is detailed in Table 6-4 of the EIS.	Section 4.3.5 of the EIS Fire Safety Strategy (Appendix G of the EIS) Fire Systems Design (Appendix H of the EIS) Traffic Impact Assessment (Appendix J of the EIS) Appendix B (Revised swept path analysis) of this RtS
	It is recommended that provisions be made for the containment of contaminated fire water run-off based on the worst credible fire scenario for the site. Any system(s) provided is to be automatic in nature and should not rely	Section 4.3.5 and the Fire Systems Design (Appendix H of the EIS) outline the fire systems incorporated into the design of the Proposal. The Amended Proposal includes changes to the fire suppression water strategy with a reduction in size of receival	Section 4.3.5 of the EIS

Aspect	Issue	Response	Reference
	upon on-site staff or emergency services personnel to access or activate provided systems or valves in the event of fire.	area pits presented in the EIS, the addition of two pits in the processing area and utilisation of a 100mm bund around the perimeter of the MRF for additional fire water containment. The revised strategy results in an increased storage capacity and ensure fire water is captured regardless of the fire scenario. This would result in the greatest possible fire water detention capacity within the building and not result in additional risks of potentially contaminated fire water exiting the MRF. Fire water captured within the MRF would be pumped and disposed of offsite. However, as a further containment control, in order to assist with the containment of fire water runoff, an automated shut off valve would be provided upstream of the discharge to the Upper Cook River drainage channel. The shut off valve would comprise a keystone or knife-gate valve with an electric actuator which would be triggered by the fire alarm.	Fire Systems Design (Appendix H of the EIS)
	It is recommended that if the development proposes to incorporate a fire engineered solution (FES), whether a building design having a performance solution in accordance with the *National Construction Code* (NCC) or other infrastructure where building codes are not applicable, FRNSW should be engaged in the fire engineering brief (FEB) consultation process at the preliminary design phase, post approval of the development application. FRNSW also recommend that clauses E1.10 and E2.3 be addressed where a FES is required.	A BCA assessment report is provided in Appendix F of the EIS to confirm the proposal satisfies the provisions of the National Construction Code Series - Volume 1- Building Code of Australia 2019 Amendment 1, in accordance with the provisions of Clause 145 of the *Environmental Planning & Assessment Regulation 2000*. In addition to this, a Fire Engineering Analysis of proposed Performance Solutions to the DtS provisions of the Building Code of Australia 2019 (BCA) relating to Proposal is provided in Appendix G of the EIS. A Fire Engineering Brief and Fire Engineering Report will be prepared prior to the commencement of construction of the Proposal. This report will address the following DtS provisions of the BCA: • Perimeter Vehicular Access – BCA Clause C2.4 • Exit travel distances and Distance between Alternative Exits – BCA Clause D1.4, D1.5 • Travel via Non-Fire-Isolated Stairways – BCA Clause D1.9 • Elevated Walkways and Platforms – BCA Clause D1.6, D2.13, D2.14, D2.15, D2.16, D2.17, D2.18	Building Code of Australia Assessment Report (Appendix F of the EIS)

Aspect	Issue	Response	Reference
		• Fire Hydrants – BCA Clause E1.3 • Sprinklers – BCA Clause E1.5, Specification E1.5 • Provision for Special Hazards – BCA Clause E1.10, E2.3 • Smoke Hazard Management – BCA Clause E2.2 • Exit and Directional Signs – BCA Clause E4.5, E4.6 • Smoke Detection – BCA Clause E2.2, Specification E2.2a.	
	It is recommended that a Condition of Consent be included that would require the fire and life safety measures for the development to be reassessed for adequacy in the event that either; significant changes are made to the site configuration, processing capacity is increased from 172,000 tpa, or there are changes to either the accepted waste streams or a significant increase in streams that are combustible in nature.	Noted. In accordance with Section 4.55 of the EP&A Act, any changes to the Proposal's development consent, including changes to either the accepted waste streams or a significant increase in streams that are combustible in nature, would be required to be approved by DPIE subject to an assessment of impacts.	N/A
	It is recommended that an emergency plan for the waste facility in accordance with *AS 3745–2010 Planning for emergencies in facilities* be prepared for the development. An external consultant should be engaged to provide specialist advice and services in relation fire safety planning and developing an emergency plan.	As noted in section 12.6 of the EIS, a PIRIMP will be prepared for the OEMP. SUEZ are committed to preparing the PIRMP in accordance with *AS 3745–2010 Planning for emergencies in facilities* as a revised mitigation measure (see Section 7).	Section 12.6 of the EIS Section 7 of the RtS

4.5 Environment, Energy and Science Group

A formal submission comprising a letter (dated 21 September 2020) was received from EES Group within DPIE. Comments from the submission have been summarised and responded to in Table 4-7.

Table 4-7 Response to government agency submission – EES

Aspect	Issue	Response	Reference
Biodiversity	EES is unable to comment on this application because the characteristics of site depend on DA 366/202, which is currently being assessed by Canterbury-Bankstown Council. The DA includes, amongst other things, the removal of trees and other vegetation and bulk earthworks.	Noted. As noted in Section 1.2 of the EIS SUEZ lodged development application (DA) 366/2020 with Council on 12th May 2020 for the development of flood mitigation works across the Chullora RRP site. Council provided a request for information to SUEZ on 4 September to which SUEZ provided a response and further information in late 2020. DA 366/2020 was determined on 2 June 2021. Appendix P of the EIS provides the Biodiversity Development Assessment Report (BDAR) prepared for the Proposal. The BDAR presented an assessment of the construction and operational activities for the Proposal that have the potential to impact biodiversity. This assessment concluded that there were no significant biodiversity impacts resulting from the development of the Proposal	Section 1.2 of the EIS Biodiversity Development Assessment Report (Appendix P of the EIS)
Flooding	EES has reviewed the following reports: • Chullora Materials Recycling Facility Amended Scoping Report (report prepared by ARCADIS for Suez), April 2020 • Rookwood Road Catchment Flood Study Report (report prepared by BMT WBM for Bankstown City Council), July 2010 • Chullora Materials Recycling Facility Environmental Impact Assessment (report prepared by ARCADIS for Suez), August 2020 • Chullora Materials Recycling Facility Environmental Impact Assessment – Appendix L Water and Hydrology Impact	Noted. In response to comments on the flood mitigation works development application (366/2020), additional modelling was undertaken in the revised Civil Engineering and Overland Flow/Flood Report for Early Works Development Application (Costin Roe, September 2020) which included modelling of flood levels and flood hazards associated with a PMF flood event post development of the flood mitigation works. Modelling indicates that PMF flood depths at the MRF would range from around 0.7 metres at the northern extent to up to 1.5 metres at the southern extent of the building. Flood hazard would be rated at H5 at both the northern and southern extents of the building with the	Chapter 22 of the EIS Section 6 of this RtS

Aspect	Issue	Response	Reference
	Assessment (report prepared by Contin Roe Consulting for Suez), August 2020. The proposed MRF (Materials Recycling Facility) is located adjacent to the Cooks River in its headwater region. The flood study completed in 2010 by (the former) Bankstown City Council in the Rookwood Road Catchment indicates that the site is subject to flood affectation during the 5% AEP Flood Event and under the events with higher recurrence intervals under existing conditions. The flooding impacts are high at the southern portion of the site, which is located adjacent to the Cooks River (channelized section). The proposed site would be inundated during the PMF Event and the floodwater depth would vary from 3m at the southern portion of the site to 1.5m at the northern portion. The flooding risk at the development site would predominantly be medium whilst the southern portion of the site would be exposed to high risk under existing conditions due to the topography and the proximity to the Cooks River. The site will be redeveloped by filling its eastern portion above the 1% AEP flood level and by constructing a flood detention basin (22,100m^3) on its western portion. The site will still be subject to flood affectation during the PMF Event when the access road to the MRF will be cut off except a small segment of Muir Road (intersecting Anzac Street) at the north-western corner of the site. This may pose risk to workers as the MRF will be operating 24/7. The risk during the PMF may be manageable by adopting an appropriate shelter-in-place strategy as the duration of flooding would be in the order of three hours. The proponent has indicated that a flood risk management plan will be in place at the MRF site to address and mitigate the flooding impacts (Appendix L of the EIS). The management plan will include a flood warden, evacuation zones and responsible persons, and will be developed in consultation with Council and the NSW SES. Subject to the development of a comprehensive flood risk management plan with well-defined roles and responsibilities for the execution of the plan during major and rarer flooding events, EES has no further comments to make on this development.	western side being rated as a mix of H3 and H4 hazard levels. A Flood Emergency Response Plan (FERP) is committed to in mitigation measure WH4, which states: *A Flood Emergency Response Plan (FERP) will be developed for operational phase of the Proposal. The FERP would take into consideration, site flooding and broader flood emergency response plans for the Upper Cooks River catchment. The FERP would also include the following:* - *Identification of an area of safe refuge within the Proposal site that would allow people to wait until hazardous flows have receded and safe evacuation is possible* - *Identification of a flood warden and other responsible persons* - *Procedures for warning staff of potential flood danger.* *The FERP will be completed in conjunction with Council and NSW State Emergency Service (SES).*	

4.6 DPIE Water and Natural Resources Access Regulator (NRAR)

A formal submission comprising a letter (dated 28 September 2020) was received DPIE Water and NRAR. Comments from the submission have been summarised and responded to in Table 4-8.

Table 4-8 Response to government agency submission – DPIE Water and NRAR

Aspect	Issue	Response	Reference
Soil contamination and groundwater	The proponent should provide more detail on groundwater settings to better understand the potential risk of adverse impacts to groundwater by the Proposal's activities. This can be done through the hydrogeological conceptual model. This should include detailed information relating to: • The geology and geological setting of the aquifer being assessed, • Monitoring bore locations, construction, and borehole lithology, • Depth to water/groundwater levels (reported in meters above the Australian Height Datum (m AHD)), including the construction and interpretation of a potentiometric surface across the site, • Water quality data collected across the site and representing the site baseline conditions.	A description of the existing groundwater environment and potential impacts to groundwater are detailed in Section 9.3, 9.4.1 and 9.5.1 of the EIS. Previous groundwater sampling investigations conducted by DLA (2016) have indicated that groundwater is present on the Chullora RRP site at shallow depths (up to 0.74m below top of well) and has a north-easterly flow across the site, toward the Cooks River. Typically, groundwater is deeper in areas furthest from the Cooks River. Groundwater sampling also identified elevated levels of some heavy metals (nickel and zinc) as well as dichlorodiphenyltrichloroethane. As noted in Section 2.3 of the EIS, new baseline conditions will be created for the Chullora RRP site by the completion of the flood mitigation works (DA 366/2020). Following the completion of these works, the existing environment for the Proposal site will consist of a levelled earthworks platform; raised above the 1 in 100 year flood level (above 38m Australian Height Datum (AHD)). Construction of the substation would require driven piles to a depth of around 1.2 metres and due to the low groundwater level across the site has the potential to intercept groundwater and be considered an aquifer interference activity. It is anticipated that piling activities would result in less than 3 megalitres of water requiring dewatering and would therefore be eligible for a water access licence exemption. Should more than 3 megalitres of groundwater require dewatering a Water Access License will be obtained as per the NSW Aquifer Interference Policy, however, it	Section 2.3 and Sections 9.3-9.5 of the EIS Section 6.2 of this RtS

Aspect	Issue	Response	Reference
		is anticipated that the Proposal would not result in groundwater drawdown or result in impacts to the aquifer. As the Proposal would not require substantial excavation works (beyond minor trenching for the laying of utilities wholly within the fill layer across the Proposal site) and is raised above the 1 in 100 year flood level, the construction of the other aspects of the Proposal including the MRF would not intercept groundwater. The controls provided to manage surface water, including erosion and sediment controls and the PIRMP, would minimise the risks of the Proposal impacting groundwater quality. Once operational the Proposal would be operated on a raised fully hardstand area and would not interact with groundwater. Due to the impervious nature of the proposed hardstand the potential for the operation of the Proposal to impact groundwater quality would be minimal and would be limited to any spills or leaks moving beyond the Proposals site boundary that occur within vehicles or machinery outside the MRF. A PIRMP will be prepared for the operation of the Proposal and spill kits will be located within the MRF to ensure appropriate management of skills and leaks in the event of an incident. Given the reasons outlined above, it is unlikely that the Proposal would have any impact on the groundwater aquifer under the Proposal site. As such, further groundwater modelling and monitoring is not considered necessary.	
	This information may be present in the following reports quoted in the main EIS document, however we were not able to access these as they do not appear to be available as supplementary documents: • Report on Soil Sampling, Former ELCAR Workshops (Douglas Partners Pty Ltd, 1996a) • Stage II Detailed Site Investigation for Lot 2 (DLA Environmental Services, 2016a)	The requested information is clarified above and outlined within the Stage 2 Contamination Assessment (ERM, 2019) and Remedial Action Plan (ERM, 2020). These documents have been appended to this RtS (see Appendix A). Other requested supplementary documents including Douglas Partners (1996), PSM (2018) and DLA (2016) are generally considered superseded and were used to help establish a historical context for the Site. As noted in Section 10.2.2 of the EIS, that all of the previous contamination investigations applicable to the Chullora RRP site were conducted prior to the completion of recent flood mitigation	Section 10.2.2 of the EIS Appendix A of this RtS

Aspect	Issue	Response	Reference
	• 15 Muir Road, Chullora, Site Redevelopment Lot 2 – Geotechnical Investigation (Pells Sullivan Meynink (PSM), 2018) • Stage 2 Contamination Assessment – 15 Muir Road, Chullora (ERM, 2019)	works (DA 366/2020) proposed by SUEZ across the Chullora RRP. Any contaminated areas identified in these assessments will have been subsequently excavated and removed or capped as part of the flood mitigation works.	
Vegetation setback	The proponent should implement a vegetated riparian zone (VRZ) setback of 10 metres from the Cooks River, or a VRZ setback of 5 metres with appropriate offsetting along this section of the watercourse. The VRZ requirements are described in the NRAR Guidelines for controlled activities on waterfront land: https://www.industry.nsw.gov.au/__data/assets/pdf_file/0004/156865/NRAR-Guidelines-for-controlled-activities-on-waterfront-land-Riparian-corridors.pdf	The Cooks River stormwater channel was upgraded as part of works required in the development of the PFD Storage Warehouse (DA 1270/2016) to the north of the Chullora RRP site. These works included the formalisation of the Cooks River stormwater canal to the south and south east of the Chullora RRP site including extensive vegetation planting adjacent to the canal. These landscaped and other native vegetation areas form more than 20 per cent of the Chullora RRP site. As per the exemptions outlined in Clause 28, Part 2 of Schedule 4 of the *Water Management (General) Regulation 2018*, controlled activities do not apply to waterfront land where the channel of the river is fully concrete lined or is a fully enclosed pipe. As the Cooks River canal is mostly fully concrete lined, the requirements of implementing a vegetated riparian zone (VRZ) setback from the Cooks River is not applicable. It is noted that the establishment of a new landscaped area along the southern boundary of the Site was subsequently added to the flood mitigation works development (DA 366/2020) (refer to Figure 1-3). This landscaped area would provide a buffer zone to the concrete lined Cooks River stormwater canal and would be maintained as part of the ongoing operation of the MRF. A vegetated portion of the canal is present in the south western boundary of the Chullora RRP. The setback in this area is more than 15 metres from the top of bank, which satisfies the requirements of the NRAR Guidelines. This position is noted to be agreement with NSW Office of Water, Council, Sydney Water and Frasers Property (owners of the land) agreed in the 2017 approval of the PFD Facility.	N/A

4.7 Sydney Trains

A formal submission comprising a letter (dated 4 December 2020) was received from Sydney Trains. Comments from the submission have been summarised and responded to in

Table 4-9 Response to government agency submission – Sydney Trains

Aspect	Issue	Response	Reference
Recommended conditions of consent	Sydney Trains has reviewed the proposal and advises that the proposed development has been assessed in accordance with the requirements of the SEPP (Infrastructure) 2007 Clause 86(4) being: a) the potential effects of the development (whether alone or cumulatively with other development or proposed development) on: i) the safety or structural integrity of existing or proposed rail infrastructure facilities in the rail corridor, and ii) the safe and effective operation of existing or proposed rail infrastructure facilities in the rail corridor, and b) what measures are proposed, or could reasonably be taken, to avoid or minimise those potential effects. In accordance with Clause 86(4) Sydney Trains requests the following conditions as worded and are not amended without further consultation.	Noted. The EIS acknowledges that immediately west of the Proposal site is a narrow strip of land owned by the Rail Corporation NSW (RailCorp), which comprises part of a disused freight railway which previously operated through this area. The site plan and design of the Proposal has ensured the maximum possible setbacks which would optimise the operational efficiency of the Proposal. The MRF would be set back approximately 150 metres from the rail siding.	Section 2.5, Section 4.3.5 and Section 5.5.2 of the EIS
	• No work is permitted within the rail corridor, or any easements which benefit Sydney Trains/TAHE (Transport Asset Holding Entity), at any time, unless the prior approval of, or an Agreement with, Sydney Trains/TAHE (Transport Asset Holding Entity) has been obtained by the Applicant. The Principal Certifying Authority is not to issue the Construction Certificate until written confirmation has been received from Sydney Trains confirming that this condition has been satisfied.	The Proposal would not require any works within the rail corridor to the west of the Proposal site. Works would be undertaken within the existing boundaries of the Proposal site with the majority of works being associated with the MRF being approximately 150 metres to the east of the rail corridor. The closest works to the rail corridor would be associated with the fire fighting systems for the broader Chullora RRP site. This would include sprinkler tanks, hydrant	

Aspect	Issue	Response	Reference
	• No rock anchors, rock bolts, ground anchors or rock ties, piles, foundations, rock pillars, transfer structures, basement walls, slabs, columns, beams, cut rock faces, are to be installed into TAHE (Transport Asset Holding Entity)/Sydney Trains property or easements. The Principal Certifying Authority is not to issue the Construction Certificate until written confirmation has been received from Sydney Trains confirming that this condition has been satisfied. • Prior to the commencement of works, the Applicant shall provide written advice from a qualified Geotechnical and Structural Engineer confirming that the proposed works are to have no negative impact on the rail corridor and associated rail infrastructure. • Prior to the commencement of any works appropriate fencing must be in place along the rail corridor to prevent unauthorised access to the rail corridor during construction works. Details of the type of fencing and the method of erection are to be to the satisfaction of Sydney Trains prior to the fencing work being undertaken. • The development shall have appropriate fencing fit for the future usage of the development site to prevent unauthorised access to the rail corridor by future occupants of the development. Prior to the issuing of an Occupation Certificate the Applicant shall liaise with Sydney Trains regarding the adequacy of any existing fencing along the rail corridor boundary or design and construction of new fencing. Details of the type of new fencing to be installed and the method of erection are to be to the satisfaction of Sydney Trains prior to the fencing work being undertaken. • During all stages of the development the Applicant must take extreme care to prevent any form of pollution entering the railway corridor. Any form of pollution that arises as a	tanks, pump room and fire control centre and fire appliance and hardstand area. Construction of these facilities is not anticipated to result in impacts to the rail corridor. The CEMP will provide the framework for the management of all potential environmental impacts resulting from construction activities, including controls such as fencing to ensure impacts to the rail corridor do not occur. It is noted that conditions of consent are a matter for the Department of Planning, Industry and Environment to consider during its assessment of the Proposal. However, SUEZ believe the scale and degree of conditions requested are not proportionate to the potential impacts to the disused rail corridor which, due to the distance from works and scope of the Proposal, are likely to be negligible. SUEZ will continue to consult with Sydney Trains throughout the detailed design and construction phases, as required, and in accordance with any conditions of consent for the Project.	

Aspect	Issue	Response	Reference
	consequence of the development activities shall remain the full responsibility of the Applicant.		
	• The Applicant must ensure that all drainage from the development is adequately disposed of and managed and not allowed to be discharged into the railway corridor unless prior written approval has been obtained from Sydney Trains.		
	• Excess soil is not allowed to enter, be spread or stockpiled within the rail corridor (and its easements) and must be adequately managed/disposed of.		
	• The Applicant must ensure that at all times they have a representative (which has been notified to Sydney Trains in writing), who: – oversees the carrying out of the Applicant's obligations under the conditions of this consent and in accordance with correspondence issued by Sydney Trains; – acts as the authorised representative of the Applicant; and – is available (or has a delegate notified in writing to Sydney Trains that is available) on a 7 day a week basis to liaise with the representative of Sydney Trains, as notified to the Applicant.		
	Without in any way limiting the operation of any other condition of this consent, the Applicant must, during demolition, excavation and construction works, consult in good faith with Sydney Trains in relation to the carrying out of the development works and must respond or provide documentation as soon as practicable to any queries raised by Sydney Trains in relation to the works.		
	Where a condition of consent requires consultation with Sydney Trains, the Applicant shall forward all requests and/or documentation to the relevant Sydney Trains External Interface Management team. In this instance the relevant interface team is Central Interface and they can be contacted via email on Central_Interface@transport.nsw.gov.au.	Noted	

4.8 Sydney Water

A formal submission comprising a letter (dated 14 September 2020) was received from Sydney Water. Comments from the submission have been summarised and responded to in Table 4-10.

Table 4-10 Response to government agency submission – Sydney Water

Aspect	Issue	Response	Reference
Water and Wastewater Servicing	Sydney Water has no objection to the proposal.	Noted.	N/A
	The proponent will require a Section 73 application via a WSC and when they lodge the application, they must include a plan showing where the development intends to connect.	Noted. A Section 73 Compliance Certificate will be obtained prior to construction to ensure water, wastewater and stormwater servicing requirements are met to a satisfactory standard. A Water Servicing Coordinator (WSC) will be engaged to manage this application.	N/A
	Depending on the proposed connection / discharge location a wastewater minor extension may also be required.	Noted. Water network extensions will be considered during detailed design. Consultation with service providers, including Sydney Water will also be undertaken during detailed design as required.	N/A
	Amplification and/or extensions of the water network may be required.		
Critical Assets	Sydney Water has a significant 2400mm SCL IBL trunk wastewater main (laid in 1957) within the property boundary and located directly underneath the proposed development. Sydney Water also has a significant 525mm CONC branch wastewater main (laid in 1960) within the property boundary and the proposed development may encroach on this main's easement. The proponent will need to engage a WSC to submit mark-up easements plans for the proposed development in relation to these critical assets. Due to the age, material and significance of these assets, an out of scope Building Over and Adjacent application may be required to ensure there is no impact to the asset. The proponent must follow the Building Plan Approval process outlined in Attachment 1.	SUEZ are aware of the 2400mm SCL IBL trunk and 525mm CONC branch wastewater mains located within the property boundary. A Water Servicing Coordinator will be engaged during detailed design to prepare a mark up of easement plans for the Proposal. Further consultation with Sydney Water will be undertaken during detailed design as required.	Section 6.3.3 of the EIS

Aspect	Issue	Response	Reference
Stormwater	As the subject development is adjacent to Sydney Water's stormwater channel, following requirements would apply: • No building or permanent structure is to be proposed over the stormwater channel / pipe or within 1m from the outside wall of the channel / pipe or within Sydney Water easement whichever is larger. Permanent structures include (but are not limited to) basement car park, hanging balcony, roof eves, hanging stairs, stormwater pits, stormwater pipes, elevated driveway, basement access or similar structures. This clearance requirement would apply for unlimited depth and height.	As described in Section 6.3.3 of the EIS, the Proposal includes the erection of a temporary pedestrian walkway overbridge that would span the Cooks River stormwater canal. The walkway would connect the mezzanine floor of the internal site office within the receival area of the MRF directly to the south-western corner of the existing car park. A lift and stairs would be installed to provide access to the walkway from the car park. The walkway would traverse the Cooks River stormwater canal, and its easement, in its entirety with no piers proposed to be installed within or adjacent to the canal. A building over and adjacent (BOA) works approval will be sought from Sydney Water during the detailed design phase of the Proposal. Detailed plans of the Proposal site will also be submitted to the Sydney Water 'Tap In' online service prior to construction. Further consultation will be undertaken with Sydney Water at this stage. No other works would occur within or above the Sydney Water stormwater canal and its easements.	Section 6.3.3 of the EIS
	• The applicant is required to submit the elevation drawings with the stormwater channel, to ensure that the proposed buildings and permanent structures are 1m away from the outside face of the stormwater channel and away from the Sydney Water easement.	Section 4.3 of the EIS describes the permanent built elements to be constructed as part of the Proposal. These features are illustrated in Figure 4-1 and Figure 4-2 of the EIS. As shown, all permanent structures would be built more than 1 metre from the outside face of the Cooks River stormwater canal and Sydney Water easement. As described in Section 6.3.3 of the EIS and noted above the Proposal would include the erection of a temporary pedestrian walkway overbridge that would span the Cooks River stormwater canal. The walkway would traverse the Cooks River stormwater canal, and its easement, in its entirety with no piers proposed to be installed within or adjacent to the canal. A BOA works approval will be sought from Sydney Water during the detailed design phase of the Proposal. Further consultation will be undertaken with Sydney Water at this stage. No other works would occur within or above the Sydney Water stormwater canal and its easements.	Section 4.3 and Section 6.3 of the EIS Figure 4-1 and Figure 4-2 of the EIS

Aspect	Issue	Response	Reference
	• Stormwater discharge from the development site is to be according to Sydney Water's stormwater connection requirements. Details of these connection requirements would be provided as part of the Section 73 application for this development	Noted. A Section 73 Compliance Certificate will be obtained prior to construction to ensure water, wastewater and stormwater servicing requirements are met to a satisfactory standard. A Water Servicing Coordinator will be engaged to manage this application.	N/A

5 RESPONSE TO COMMUNITY SUBMISSIONS

This section provides a summary of the submissions raised by public stakeholders, including organisations and members of the community. As described in Section 3, submissions have been grouped and responded to by key environmental aspects and issues. Responses to community submissions are provided in Table 5-1.

Table 5-1 Response community submissions

Aspect	Issue summary	Response	Reference
Public Submission #1			
General	General feedback in support of the development of a Materials Recycling Facility.	Noted	N/A
Public Submission #2			
Air quality impact	The Air Quality Impact Assessment (AQIA), provided in Appendix K of the EIS, does not appropriately consider industrial land uses, including adjoining land uses at 26 Muir Road, as sensitive receivers. Future sensitive receivers have also not been considered.	A detailed analysis of the air quality impacts generated by the Proposal is provided in Chapter 8 and the Air Quality Impact Assessment (Appendix K of the EIS). As noted in Section 5.3.1 of the EIS, the Proposal site is zoned IN1 General Industrial as are the adjoining land uses. One of the objectives of IN1 zoned land, as outlined in Part 2 of the *Bankstown Local Environmental Plan 2015* (BLEP 2015), is to minimise any adverse effects of industry on other land uses. This objective implies that the purpose of an industrial area is to group industry together such that more sensitive land use zones are protected or buffered from less sensitive land uses. SUEZ agree that 'sensitive receptors' are not limited to residential areas, however given the objectives of the IN1 zone as per the BLEP 2015 the methodology applied in the Air Quality Impact Assessment (Appendix K of the EIS) is considered appropriate. As demonstrated in Section 4.2 of the Air Quality Impact Assessment (Appendix K of the EIS), the operation of the Proposal would not significantly impact the existing airshed. The operation of the Proposal is not anticipated to exceed the assessed pollutant criteria at any sensitive receivers except for $PM_{2.5}$ (particulate matter less than 2.5 microns in diameter) and PM_{10} (particulate matter less than 10 microns in diameter) where background concentrations already exceed the criteria thresholds. In this case, the MRF only contributes an additional 0.2 per cent ($PM_{2.5}$) and 0.5 per cent (PM_{10}) increase to the background levels. Contour plates appended to the Air Quality Impact Assessment illustrate the predicted air quality impact of the Proposal on the surrounding receivers for each of the assessed pollutants. As demonstrated, concentrations of pollutants at 26 Muir Road, Chullora are below the established air quality criteria in all categories assessed.	Chapter 8 and Chapter 22 of the EIS Air Quality Impact Assessment (Appendix K of the EIS)

Aspect	Issue summary	Response	Reference
		A cumulative impact assessment is outlined in Chapter 20 of the EIS. This includes a description of potential future sensitive receivers in the surrounding areas. The assessment of air quality impacts found that due to the minimal significance of operational impacts identified in the Air Quality Impact Assessment (Appendix K of the EIS) and through the implementation of appropriate mitigation measures, the air quality impacts on future sensitive receivers as a result of the Proposal is likely to be negligible. A number of mitigation measures will be implemented during construction and operation of the Proposal to minimise any potential air quality impacts. These are outlined in Section 8.6 of the EIS. Air quality impacts will be managed through the implementation of a site-specific CEMP and OEMP.	
Traffic impact	The Traffic Impact Assessment (TIA), provided in Appendix J of the EIS, does not consider the impacts of heavy vehicles on Muir Road at all times of the day (24/7 operation) including queuing, congestion and emissions. 26 Muir Road, which has a site access located directly opposite the Proposal site access, may be particularly affected. Further modelling is required to be undertaken to establish these impacts.	The Traffic Impact Assessment (Appendix J of the EIS), provides an analysis of the Proposal's impact on the surrounding road network, including assessment of queuing and congestion on Muir Road. A number of points of clarification were raised by Transport for NSW regarding the type and size of trucks that would delivery and collect product and the tonnages of product that would be transported per vehicle. It is acknowledged that some minor discrepancies occur within the EIS regarding vehicle types and loads. Key points of clarification are provided in Section 4.3. Notwithstanding, it has been shown that there is no change in the findings of the TIA in the EIS An assessment of queuing in the turning lanes on Rookwood/Muir Road and Hume Highway/Muir Road is presented in Section 4.6 of the TIA. This assessment modelled the impact of site generated traffic from the Proposal on queuing lanes under four future scenarios. In comparison to the impact of background traffic growth, the Proposal site is expected to result in minimal additional queue length to left-turn and right-turn movements on nearby major roads with the exception of Scenario 4 (2032 conditions) for the left-turn movement from Rookwood Road to Muir Road in the AM peak period. In this scenario, there would be an additional queue length of 11.1 m (between 1 to 2 car lengths). An additional 1-2 car lengths to the queue is considered minor and would not result in an adverse impact to the intersection operation. Section 4.7 of the TIA presents an analysis of the Proposal's traffic movements in and out of the site access driveway on Muir Road. Opposite the Proposal site access, to the north of Muir Road, is a site access to 26 Muir Road. When entering the Proposal site from Muir Road west approach, trucks will be able to idle in a right turn bay while waiting to turn into the Proposal site. The right turn	Traffic Impact Assessment (Appendix J of the EIS) Air Quality Impact Assessment (Appendix K of the EIS) Greenhouse Gas Assessment (Appendix R of the EIS)

Aspect	Issue summary	Response	Reference
		bay provides waiting space outside the Muir Road dual carriageway and the site access to 26 Muir Road. As addressed in Section 4.7 of the TIA, the Proposal is anticipated to generate six trucks in the AM peak hour and four trucks in the PM peak hour turning right into the site. SIDRA traffic modelling analysis of the site access indicates that the addition of these heavy vehicle movements would have a minor impact on queues into and out of the Proposal site. The modelling results show a queue length of less than one vehicle at the Proposal site access, which would be sufficiently accommodated by the approximately 50 m right turning bay provided. This demonstrates that even in peak conditions, Muir Road can accommodate the vehicles turning into the Proposal site. Under these circumstances, there should be no significant impact to vehicles accessing the property at 26 Muir Road. Proposal site generated vehicle movement estimates for both typical operation and peak operation are presented in Table 4-4 of the TIA. Traffic movements are estimated across a 24-hour period to account for the 24/7 operation of the Proposal. As shown, The Proposal's peak operational period would be expected to occur between 4:00-5:00am and 12:00pm-1:00pm which does not overlap with the peak AM and PM traffic movements on the local road network. An assessment of the roadway capacity on Muir Road is presented in Section 4.8 of the TIA. Existing baseline conditions for the roadway capacity is detailed in Section 3.3 of the TIA. The Proposal is expected to generate less than an additional 20 passenger car units (pcu). While traffic flows on Muir Road currently operate close to the typical capacity, an additional 20 pcu is considered marginal and would not be expected to have any noticeable impacts on the capacity of the roadway. As a result, the Proposal is not anticipated to result in additional congestion on Muir Road. Given the above, it is considered that the assessments provided in Appendix J of the EIS are sufficient in establishing traffic related impacts of the Proposal on the surrounding road network. Emissions from vehicle exhaust have been considered within the AQIA and GHG Assessment provided in Appendix K and R of the EIS.	

Aspect	Issue summary	Response	Reference
Noise impact	The Noise and Vibration Impact Assessment (NQIA), provided in Appendix N of the EIS, does not consider the impact of road noise on surrounding industrial land uses, including 26 Muir Road, Chullora.	A detailed analysis of the road noise generated by the Proposal is provided in the Noise and Vibration Impact Assessment (Appendix N of the EIS). This assessment was carried out in accordance with the NSW RNP (DECCW, 2011) which establishes assessment criteria for noise from traffic on public roads. The primary aim of the RNP is to "*provide protection primarily inside and immediately around permanent residences, and at schools, hospitals and other sensitive land uses, rather than at all points in a given locality.*" In accordance with the RNP the Noise and Vibration Impact Assessment (Appendix N of the EIS) presents an assessment of road noise impacts during the peak operational period on surrounding residential receivers. This assessment predicted that the addition of heavy vehicles along Rookwood Road and the Hume Highway would only increase road noise levels by 0.1 dBA, which is significantly less than the RNP threshold criteria of 2 dBA. Further to the above, the Proposal site and adjoining land uses, including 26 Muir Road, Chullora, are zoned IN1 General Industrial. One of the objectives of IN1 zoned land, as outlined in Part 2 of the *Bankstown Local Environmental Plan 2015* (BLEP 2015), is to minimise any adverse effects of industry on other land uses. This objective implies that the purpose of an industrial area is to group industry together such that more sensitive land use zones are protected or buffered from less sensitive land uses. Given this, the methodology applied in the Noise and Vibration Impact Assessment (Appendix N of the EIS) is considered appropriate. Notably, the Chullora RRP site has been operated in an industrial capacity since the 1920s and as a waste management facility since 1996. The operation of the Proposal would not disrupt the historically industrial setting of the area. Given this, any amenity impacts will be minimal and consist with the context of the surrounding landscape.	Noise and Vibration Impact Assessment (Appendix N of the EIS)

6 AMENDED PROPOSAL

As outlined in Chapter 4 of the EIS, the proposal description and associated assessment presented in the EIS is based on an indicative and conceptual design. The initial design is subject to refinement as the Proposal is further evaluated and consultation feedback is received. As such, subsequent to the EIS being exhibited, the proponent is proposing a number of minor design refinements to the project to improve efficiency and manage potential impact. This chapter outlines the proposed changes along with an assessment of potential additional environmental and social impacts during construction and operation associated with the proposed amendments.

The Amended Proposal includes the following components:

- Addition of second outbound weighbridge
- Adjustment of the fire water detention storage strategy to maximise storage capacity
- Minor changes to the location of external doors of the MRF
- Minor changes to the proposed substation design
- Minor internal layout changes.

Following review of the anticipated development costs associated with the Proposal, a revised CIV Report has been prepared (refer to Appendix E). The revised CIV report outlines the anticipated development costs would be approximately $36.7 million (excluding GST).

6.1 Second outbound weighbridge

In order to improve efficiency of the Chullora RRP and to ensure that vehicles can exit the facility in a timely manner, it is now proposed to include a second outbound 28 metre weighbridge adjacent to the outbound weighbridge proposed in the EIS, along with relocating both weighbridges to the north of the fire suppression infrastructure. The addition of the second outbound weighbridge would not affect the waste tracking process required by the *Protection of the Environment Operations (Waste) Regulation 2014* and outlined in the EIS. Similarly, the addition of the second outbound weighbridge and movement of weighbridges to the north would not impact accessibility for fire trucks to access fire suppression infrastructure located to the west of the access road to the site. Fire trucks would continue to access the infrastructure by utilising the inbound lane past the outbound weighbridges and reversing into the fire suppression infrastructure location (refer to Appendix B).

An overview of environmental impacts associated with the addition of the second outbound weighbridge is outlined in Table 6-1.

Table 6-1 Environmental assessment – Second outbound weighbridge

Environmental aspect	Environmental impact assessment
Traffic, access and parking	The additional outbound weighbridge would result in improved efficiency of the Chullora RRP site. It would reduce the need for queueing of outbound vehicles and result in faster turnaround times for both delivery and product collection vehicles. As noted above the addition of the weighbridge would not result in increased impacts to accessibility of fire trucks to the fire suppression infrastructure located in the north west of the Site.
Air quality and odour	No additional impacts.
Water and hydrology	No additional impacts.

Environmental aspect	Environmental impact assessment
Soils and contamination	No additional impacts.
Noise and vibration	No additional impacts.
Hazards and risk	No additional impacts.
Socio-economic	No additional impacts.
Biodiversity	No additional impacts. The addition of the second outbound weighbridge and movement north can be accommodated within the existing cleared, hardstand area associated with the Site access road and would not require the clearing of vegetation within the vegetated area in the northwest of the Site classed as the endangered ecological community *Cooks River / Castlereagh Ironbark Forest in the Sydney Basin Bioregion*.
Aboriginal heritage	No additional impacts.
Non-Aboriginal heritage	No additional impacts.
Greenhouse gas emissions	No additional impacts.
Visual amenity	No additional impacts.
Waste management	No additional impacts.
Cumulative impacts	No additional impacts.

6.2 Substation design

Following consultation with electricity providers (Ausgrid and Energy Australia), a refined design of the proposed substation has now been confirmed. Construction of the substation would require four piers with an approximate diameter of 300 mm to be driven to a depth of 1.5 musing bored piling. The substation transformers would be approximately 0.5 m higher that the 1 in a 100 year flood level. The substation would remain in the same location on the Proposal site as identified in the EIS.

An overview of environmental impacts associated with the refined substation design is outlined in Table 6-2.

Table 6-2 Environmental assessment – Second outbound weighbridge

Environmental aspect	Environmental impact assessment
Traffic, access and parking	No additional impacts.
Air quality and odour	No additional impacts.

Environmental aspect	Environmental impact assessment
Water and hydrology	As part of the flood mitigation works development (DA 366/2020) the Proposal site would be raised by around one metre. The revised substation design would therefore be located above the 1 in a 100 year flood level and would therefore result in no additional flooding impacts over those presented in the EIS. Construction of the substation would require driven piles to a depth of around 1.2 m which would, due to the raising of the site, involve piling predominantly in fill. However due to the high groundwater level across the site there remains a possibility of encountering small amounts of groundwater during piling works. Given that piling would be predominantly within fill, should groundwater be intercepted, it is anticipated that works would result in less than three megalitres of water requiring dewatering and would therefore be eligible for a water access licence exemption. Should more than three megalitres of groundwater require dewatering a Water Access License would be obtained as per the NSW Aquifer Interference Policy, however, it is anticipated that the Proposal would not result in groundwater drawdown or result in impacts to the aquifer.
Soils and contamination	No additional impacts. Erosion and sedimentation controls as outlined in the EIS would be implemented during construction works associated with the revised substation design.
Noise and vibration	As part of the design development, it has been identified that some bored piling works will be needed to construct the slab for the substation. The construction of the bored piles is likely to be less than two weeks. A review of the potential noise and vibration impacts of the revised substation design has been undertaken by RWDI (formerly Wilkinson Murray) (refer to Appendix D). This review concluded that the predicted noise levels from bored piling does not change the predicted noise levels within the EIS significantly and that the management measures proposed in the EIS to manage construction noise levels would still apply. In addition, RWDI outline recommended safe working distances for vibration intensive plant associated with the proposed bored piling works. Reviewing the safe working distances for cosmetic damage and human responses indicated a safe working distance for building damage and human comfort of 2 metres. During construction of the Proposal, it is considered unlikely that bored piling would be operated within 2 metres of a building. Therefore, vibration impacts from piling are considered unlikely.
Hazards and risk	No additional impacts.
Socio-economic	No additional impacts.
Biodiversity	No additional impacts.
Aboriginal heritage	No additional impacts. The bulk of piling works would occur within the layer of fill developed as part of the flood mitigation works development (DA 366/2020) and would be therefore very unlikely to disturb any unknown items of Aboriginal heritage significance.
Non-Aboriginal heritage	No additional impacts.
Greenhouse gas emissions	No additional impacts.
Visual amenity	No additional impacts.

Environmental aspect	Environmental impact assessment
Waste management	No additional impacts.
Cumulative impacts	No additional impacts.

6.3 Minor MRF door adjustments and internal layout changes

In order to improve efficiencies of internal processes of the MRF, further design development has identified the need for minor adjustments to the internal layout and external shutter door locations. These are identified on Figure 1-2. Adjustments to external door locations would result in the removal of one door on the eastern side of the MRF. The second door in this area would be retained but relocated slightly to the south (<10 metres).

Internal layout adjustments would primarily relate to the receival area as follows:

- Conveyors would be located adjacent to the western and northern walls of the receival area (instead of between receival bays)
- Push walls would be erected between the receival bays
- The cardboard and paper bay would be demarcated as the eastern most receival bay
- Internal doors between the receival area and processing area would be removed.

An overview of environmental impacts associated with the minor MRF door adjustments and internal layout changes is outlined in Table 6-3.

Table 6-3 Environmental assessment – Minor MRF door adjustments and internal layout changes

Environmental aspect	Environmental impact assessment
Traffic, access and parking	No additional impacts.
Air quality and odour	No additional impacts. It is not anticipated that the adjustment of internal layout or adjustment of external doors would result in any additional operational air quality impacts. The removal of one external door would reduce the potential for emissions leaving the MRF. The remaining doors would remain in the same general area and be of the same size as proposed in the EIS. Along with the large distance to the nearest sensitive receivers the potential for increased odour impacts is considered negligible.
Water and hydrology	No additional impacts.
Soils and contamination	No additional impacts.
Noise and vibration	A review of the potential noise impacts of the minor internal layout and door location changes has been undertaken by RWDI (formerly Wilkinson Murray) (refer to Appendix D). This review concluded when considering the location of nearby residential areas (>400 metres), the potential movement of the roller shutter doors by approximately 5 to 10 metres is unlikely to change the predicted noise levels identified in the EIS. The change in noise level would be less than plus or minus 0.2dB.

Environmental aspect	Environmental impact assessment
	With regard to the industrial neighbours, the movement of the doors would not change the predicted noise level magnitude in the EIS, however may move the spatial location of the impact marginally, however any change would not be noticeable.
Hazards and risk	No additional impacts.
Socio-economic	No additional impacts.
Biodiversity	No additional impacts.
Aboriginal heritage	No additional impacts.
Non-Aboriginal heritage	No additional impacts.
Greenhouse gas emissions	No additional impacts.
Visual amenity	No additional impacts.
Waste management	No additional impacts.
Cumulative impacts	No additional impacts.

6.4 Removal of MRF fire suppression water pits

The EIS identifies that two inground pits / interceptors with a total capacity of 1.536 million litres would be provided in the receival area to capture any water generated by the sprinkler and deluge system in the event of a fire. Further design development has resulted in changes to the fire suppression water strategy with a reduction in size of receival area pits presented in the EIS, the addition of two pits in the processing area and utilisation of a 100 mm bund around the perimeter of the MRF for additional fire water containment.

The revised strategy would result in an increased fire water detention capacity and ensure fire water is captured regardless of the fire scenario. The Amended Proposal would result in the greatest possible fire water detention capacity within the building and not result in additional risks of potentially contaminated fire water exiting the MRF. Fire water captured within the MRF would be pumped and disposed of offsite at an appropriately licenced facility.

As described in the EIS, in order to assist with the containment fire water runoff, provision of an automated shut off valve would be provided upstream of the proposed discharge point into the Upper Cook River drainage channel. The shut off valve would comprise a keystone or knife-gate valve with an electric actuator which would be triggered by the fire alarm.

An overview of environmental impacts associated with the removal of MRF fire suppression water pits is outlined in Table 6-4.

Table 6-4 Environmental assessment – Removal of MRF fire suppression water pits

Environmental aspect	Environmental impact assessment
Traffic, access and parking	No additional impacts.

Environmental aspect	Environmental impact assessment
Air quality and odour	No additional impacts.
Water and hydrology	The EIS outlines that the Proposal has the potential to impact water quality through the generation of fire water that may include pollutants which are the by-products of combustion and may also contain chemical re-agents commonly used for fire suppression. In order to assist with the containment fire water runoff, provision of an automated shut off valve would be provided upstream of the proposed discharge point into the Upper Cook River drainage channel. The shut off valve would comprise a keystone or knife-gate valve with an electric actuator which would be triggered by the fire alarm. Given that fire water would be able to be contained within the pits and the MRF itself and that any water captured would continue to be pumped and disposed of offsite any appropriately licenced facility, no additional water quality impacts are anticipated.
Soils and contamination	No additional impacts. The reduction in size of individual pits would reduce the depth requirements for excavation during construction, potentially reducing overall risks associated with soils and contamination. While the inclusion of two new pits in the processing area would result in an increased number of excavations required, excavations would be of a smaller size than originally proposed for the receival area pits and would be contained to the fill layer. Excavations would therefore not be expected to result in increased impacts or risks. Potential soils and contamination impacts associated with the additional pits would be managed through the implementation of mitigation measures to outlined in the CEMP (refer to Chapter 7).
Noise and vibration	No additional impacts.
Hazards and risk	No additional impacts. Fire safety systems would continue to provide appropriate fire suppression capacity. The fire systems design has been prepared in consultation with FRNSW and in accordance with Fire Safety Guideline: Fire Safety in Waste Facilities (FRNSW, 2020). Further consultation would continue to be undertaken with FRNSW during further design development and construction to ensure continued compliance with relevant guidelines.
Socio-economic	No additional impacts.
Biodiversity	No additional impacts.
Aboriginal heritage	No additional impacts.
Non-Aboriginal heritage	No additional impacts.
Greenhouse gas emissions	No additional impacts.
Visual amenity	No additional impacts.
Waste management	No additional impacts.
Cumulative impacts	No additional impacts.

7 REVISED COMPILATION OF MITIGATION MEASURES

The EIS for the Proposal identified a range of environmental impacts and recommended management and mitigation measures to avoid, remedy or mitigate the identified impacts (refer to Chapter 22 of the EIS).

These mitigation measures have been revised in response to the following:

- Submissions received during the public exhibition period
- Design development.

Amendments to the mitigation measures have been identified having regard to additions (**bold underlines**) and deletions (~~**bold strikethroughs**~~). SUEZ notes that these mitigation measures were also updated following a draft review of this document by the Department of Planning and Environment and relevant Government agencies.

The revised mitigation measures provided in Table 7-1 below represent the final mitigation measures for the Proposal to be incorporated into the conditions for the approval of the Proposal, as required by Schedule 2, Part 3, clause 7(1)(e) of the EP&A Regs.

The 'implementation stage' column of details the timing as to when the specific mitigation measures would be undertaken. For example, a CEMP might be prepared prior to construction, but would not be 'implemented' until the construction or operation phase.

For the purpose of the revised mitigation measures, the following definitions apply to the terms used in the implementation phase column:

- **Construction phase**: either prior to, or during construction of all physical works for the Proposal
- **Operation phase**: either prior to, or during the operation of the Proposal.

Table 7-1 Revised compilation of mitigation measures

No.	Revised mitigation measure	Timing
General		
GE1	**A Construction Environmental Management Plan (CEMP) will be prepared prior to construction of the Proposal and would include:** • **Description of activities to be undertaken during construction (including the scheduling of construction)** • **Details of environmental policies, guidelines and principles to be followed in the construction of the Proposal** • **Responsibilities for the implementation of all mitigation measures** • **Inspection and reporting requirements** • **Protocols for managing and incidents and non-compliances** • **Procedures for rectifying any non-compliances identified during compliance auditing or at any time during construction.**	**Construction**
Traffic, access and parking		
TA1	A CEMP, or equivalent, will be prepared to address the specific traffic control requirements during the construction phase of the Proposal. The plan will assess the provision of traffic control measures, including: • Site signage and road signage • Enforcement of speed limits for construction traffic • Site-internal pedestrian routes • Site induction for construction staff. The induction will include permitted access routes to and from the construction site for all vehicles, as well as standard environmental, occupational health and safety (OH&S), driver protocols and emergency procedures • Contracts outlining site traffic rules and traffic management requirements • Scheduling of construction vehicles entering and exiting the site via Muir Road.	Construction
TA2	Site-specific Traffic Control Plans (TCPs) will be prepared as part of the CEMP to outline how construction vehicle manoeuvres will be accommodated in and out of the work site. Temporary traffic controls will be regularly inspected by the contractor to identify potential safety hazards to enable implementation of the correct solutions.	Construction

No.	Revised mitigation measure	Timing
TA3	An (Operational Traffic Management Plan (OTMP) will be prepared to address the specific traffic control requirements during the operational phase of the Proposal. The plan will assess the provision of traffic control measures, including: • Site signage and road signage • Enforcement of speed limits • Site-internal pedestrian routes • Scheduling processes.	Operation
Air quality and odour		
AQ1	A CEMP, or equivalent, will be prepared for the Proposal to minimise air quality and odour impacts. Where appropriate, mitigation measures to minimise the air quality and odour impacts during construction will be reviewed and considered for incorporation into the CEMP.	Construction
AQ2	An Operational Environmental Management Plan (OEMP), or equivalent, will be prepared for the Proposal that will include measures to minimise air quality and odour impacts. Where appropriate, mitigation measures to minimise the air quality and odour impacts during operation will be reviewed and considered for incorporation into the OEMP.	Operation
Water quality and hydrology		
WH1	A CEMP, or equivalent, will be prepared for the Proposal to minimise water and hydrology related impacts and will include the following: • An (ESCP) will be prepared by a suitably qualified professional in accordance with the Blue Book (Landcom, 2004) and will include • An Erosion and Sediment Control Plan (ESCP) will be prepared **by a suitably qualified professional** in accordance with the Blue Book (Landcom, 2004) and will include **at a minimum**: – Type and location of erosion and sediment controls – Inspection and maintenance regimes following rainfall events • Construction traffic access points. Construction traffic will be restricted to delineated access tracks, and maintained until construction complete	Construction

No.	Revised mitigation measure	Timing
WH2	A Pollution and Incident Response Management Plan (PIRMP) and an Emergency Response Plan will be prepared for the Proposal to outline the procedure to be followed in the event of an incident or emergency during construction and operation. The PIRMP will cover the following types of emergency or incident: • On-site spills or leaks • Off-site discharges • Flooding • Fire. The PIRMP will include: • Training and induction protocols. Induction will be provided to all staff and subcontractors outlining their responsibilities in the event of an emergency or incident • Incident response in the case of a fire, including: – Protocols for the containment and disposal of fire water • Notification requirements and timeframes to applicable authorities in the event of an emergency or incident • The location and content of a spill kit. A spill kit will be present on site at all times • Review regimes of the PIRMP. Regular reviews and updates will be made for the PIRMP as required.	Construction and operation
WH3	A**n** OEMP, or equivalent, will be prepared for the Proposal to minimise water and hydrology related impacts and will include the management, maintenance and cleaning schedule to ensure that stormwater management system devices are regularly inspected and cleaned.	Operation
WH4	A Flood Emergency Response Plan (FERP) will be developed for operational phase of the Proposal. The FERP would take into consideration, site flooding and broader flood emergency response plans for the Upper Cooks River catchment. The FERP would also include the following: • Identification of an area of safe refuge within the Proposal site that would allow people to wait until hazardous flows have receded and safe evacuation is possible • Identification of a flood warden and other responsible persons • Procedures for warning staff of potential flood danger. The FERP will be completed in conjunction with Council and NSW State Emergency Service (SES).	Operation

No.	Revised mitigation measure	Timing
Soils and contamination		
SC1	A CEMP, or equivalent, will be prepared for the Proposal to minimise soil and contamination related impacts and will include the following: • Maintenance requirements for erosion and sediment controls established across the Proposal site • A contingency plan for disturbance of unexpected contaminated materials (unexpected finds protocol), such as materials that are odorous, stained or containing anthropogenic materials, that may be encountered during construction • The location and content of a spill kit. A spill kit will be present on site at all times	Construction
SC2	A PIRMP will be prepared for the Proposal to outline the procedure to be followed in the event of a chemical spill or leak during construction and operation. This will include notification requirements and use of absorbent material to contain the spill or leak.	Construction and operation
SC3	An OEMP, or equivalent, will be prepared for the Proposal to minimise contamination related impacts and will include the following: • A refuelling procedure that will be implemented for all refuelling activities undertaken. Any fuel, lubricant or hydraulic fluid spillages will be collected using absorbent material, and contaminated material would be transported to a licensed waste facility for disposal • The location and content of a spill kit. A spill kit will be present on site at all times	Operation
Noise and vibration		
NV1	A CEMP, or equivalent, will be prepared for the Proposal to minimise noise and vibration impacts and will include the following: • Consideration of the selection of plant and processes with reduced noise emissions • A complaint handling process • Induction and training procedures for construction staff. An induction will be provided to relevant staff and sub-contractors outlining their responsibilities with regard to noise • Procedures for approval of any works undertaken outside of standard hours • **Identification of each work area, site compound and access route (both private and public)** • **Identification of the specific activities that will be carried out and associated noise sources at the premises and access routes** • **Identification of all potentially affected sensitive receivers the construction noise and vibration objectives.**	Construction
NV2	An OEMP, or equivalent, will be prepared for the Proposal to address noise and vibration impacts. Where appropriate, mitigation measures to minimise the unnecessary generation of noise during operation will be reviewed and considered for incorporation into the OEMP.	Operation

No.	Revised mitigation measure	Timing
Hazards and risks		
HR1	A CEMP, or equivalent, will be prepared for the Proposal to minimise hazards and risks and will include the following: • Health and safety requirements for construction. Construction works, including the storage, handling and use of hazardous construction materials will be undertaken in accordance with the provisions of the *Work Health and Safety Act 2011* and *Work Health and Safety Regulation 2011.* • Operational access and egress points for emergency service personnel and workers.	Construction
HR2	A PIRMP and an Emergency Response Plan will be prepared for the Proposal to outline the procedure to be followed in the event of an incident or emergency during construction and operation. The PIRMP will be developed collaboratively with the construction contractor and site operator and in consultation with the NSW Police force, NSW Fire Brigade and the Ambulance Service of NSW. **Both the PIRMP and Emergency Response Plan will be prepared in accordance with *AS 3745–2010 Planning for emergencies in facilities.*** Emergency response and incident management protocols will cover the following types of emergency or incident: • Workplace health and safety • On-site spills or leaks • Off-site discharges • Hazardous materials / dangerous goods • Flooding • Road incidents, including incidents involving the transport of dangerous or toxic goods • Fire. The PIRMP will include: • Training and induction protocols. Induction will be provided to all staff and subcontractors outlining their responsibilities in the event of an emergency or incident • Incident response in the case of a fire, including: – Measures to prevent fires on site and for the management of hot loads (fires occurring in transfer vehicles) – Treatment of fires as an emergency. The extinguishment of fires will take precedence over normal operations – Protocols for the containment and disposal of fire water	Construction and operation

No.	Revised mitigation measure	Timing
	– Maintenance requirements for firefighting equipment. All firefighting equipment will be regularly maintained in accordance with the equipment maintenance specification. Equipment will be replaced as necessary. • Notification requirements and timeframes to applicable authorities in the event of an emergency or incident • Non-confirming waste protocols • The location and content of a spill kit. A spill kit will be present on site at all times • Review regimes of the PIRMP. Regular reviews and updates will be made for the PIRMP as required.	
Socio-economic		
SE1	A CEMP and OEMP, or equivalent, will be prepared for the Proposal to minimise social impacts and will include the following: • A consultation strategy outlining measures to maintain communication with the community and all relevant stakeholders throughout construction and operation • A complaint handling procedure. A complaints register will be maintained to manage public complaints regarding odours, vermin, litter, dust and noise • Measures to respond to complaints and feedback received during the construction and operation of the Proposal.	Construction and operation
Biodiversity		
BD1	A CEMP, or equivalent, will be prepared for the Proposal to minimise impacts to biodiversity and will include the following: • Protocols around 'No Go' zones. Prior to commencement of construction, the Proposal site will be delineated from the patch of native vegetation in the north-western corner of the Chullora RRP with fencing to prevent inadvertent damage to the **threatened ecological community** (TEC) from construction activities. Signage should be attached to the fence identifying the area as a 'No Go Zone' • Environmental constraints maps clearly identifying the locations of threatened ecological communities adjacent to the Proposal boundary • Site induction protocols. Site inductions will include a briefing on local fauna and protocols to be undertaken if fauna are encountered • Requirements for lighting. Where feasible, directional lighting will be used where lighting is required • Consideration of the selection of plant and processes with reduced noise emissions.	Construction

No.	Revised mitigation measure	Timing
BD2	If any animal is injured, the relevant local wildlife rescue agency (e.g. WIRES) and / or veterinary surgery will be contact as soon as practical. Until the animal can be cared for by a suitably qualified animal handler, if possible, the stress of the animal will be reduced by: • Handling fauna with care and as little as possible • Covering larger animals with a towel or blanket and placing in a large cardboard box • Placing small animals in a cotton bag, tied at the top • Keeping the animal in a quiet, warm, ventilated, and dark location.	Construction and operation
Aboriginal heritage		
AH1	An unexpected finds protocol will be prepared and included in the CEMP and OEMP. This protocol will outline the procedure for managing the identification of items of potential Aboriginal heritage significance during construction and operation. This protocol will include the following requirements: • Works in the vicinity of the item will be required to cease • OEH will be immediately informed to determine the appropriate management strategy • Should items need to be disturbed (exposed, moved, damaged or destroyed), this will not be undertaken until an excavation permit is received under Section 139 of the *Heritage Act 1977.* The duration of this will depend on the integrity and significance of the heritage item.	Construction and operation
Non-Aboriginal heritage		
AH1	An unexpected finds protocol will be prepared and included in the CEMP and OEMP. This protocol will outline the procedure for managing the identification of items of potential Aboriginal heritage significance during construction and operation. This protocol will include the following requirements: • Works in the vicinity of the item will be required to cease • EES Group will be immediately informed to determine the appropriate management strategy • Should items need to be disturbed (exposed, moved, damaged or destroyed), this will not be undertaken until an excavation permit is received under Section 139 of the *Heritage Act 1977.* The duration of this will depend on the integrity and significance of the heritage item.	Construction and operation

No.	Revised mitigation measure	Timing
Greenhouse gas emissions		
GG1	A CEMP and OEMP, or equivalent, will be prepared for the Proposal to minimise GHG emissions impacts and will include the following: • Inclusion of energy efficiency design aspects, where practicable, in order to reduce energy and fuel consumption • Machinery selection considerations. Fuel efficiency of the construction plant and equipment will be assessed prior to selection, and where practical, equipment with the highest fuel efficiency and which uses lower GHG intensive fuel (e.g. biodiesel) will be used • Factors for considerations for the use of energy-efficient lighting and energy-efficient appliances.	Construction and operation
Visual amenity		
VA1	A CEMP and OEMP, or equivalent, will be prepared for the Proposal to minimise landscape and visual amenity impacts and will include the following: • Locations for equipment and materials storage. All works equipment and material will be contained within designated boundaries of the Proposal site. Where possible, elements within the construction site will be located to minimise visual impacts, including: – Setting back large equipment from site boundaries – Minimising the height and spread of stockpiles, waste, and vehicle parking across the site – Site vehicles will be parked in appropriate locations • Cleaning protocols. Dust and dirt will be regularly cleaned from the road surface. Any graffiti will be promptly removed.	Construction and operation
Waste management		
WM1	A CEMP, or equivalent, will be prepared for the Proposal to minimise waste related impacts and will include the following: • Waste prioritisation. Avoidance and reuse of construction materials will have priority over recycling materials. Recycling of materials will have priority over disposal of materials • **Requirement to ensure that there** ~~**Location and number of collections bins. There**~~ will be adequate placement of general waste and recycling bins around the Proposal site, with particular emphasis on the lunchroom and site office • Waste management protocols: – Management of any identified hazardous waste streams	Construction and operation

No.	Revised mitigation measure	Timing
	– Procedures to manage waste streams, including handling, storage, classification, quantification, identification, and tracking – Procedures and targets for reuse and recycling of waste materials. • Induction and training procedures for staff. An induction will be provided to relevant staff and sub-contractors outlining their responsibilities with regard to waste management.	

8 CONCLUSION

SUEZ Recycling & Recovery Pty Ltd (the Applicant) is seeking to establish a state-of-the-art RRP at 21 Muir Road, Chullora (Lot 2 DP 1227526). The EIS for the Proposal was publicly exhibited between 20 August to 16 September 2020.

This RtS has been prepared in to address comments raised by both government agencies and the community during the public exhibition of the EIS. This RtS provides further information and justification for the Proposal in order to respond to and address the submissions received.

This RtS also outlines several amendments to the Proposal as exhibited in the EIS and concludes that the amendments would result in negligible additional environmental impacts over those outlined in the EIS.

The mitigation measures provided within the EIS have been updated to respond to the submissions received and further design refinements (refer to Section 7 of this RtS). Overall, the assessment identifies that the Proposal would, subject to the implementation of updated mitigation measures, result in no substantial environmental impacts in addition to those identified within the EIS.

9 REFERENCES

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