

26 July 2016

Mr. Robert Byrne
Senior Planner
Industry Assessments
NSW Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr. Byrne

Re: Notification of Modification Request Orora Paper Mill, Matraville (MP05_0120 (Mod 6)).

I refer to your letter dated 6 July 2016 requesting Council's comments on the abovementioned development for the Orora Paper Mill, Matraville. I note the proposal involves the following:

- Section 96 modification to provide an additional Wastewater Treatment Plant (WTP) facilities to be located centrally within the site and adjacent to existing WTP facilities.

Key Issues:

It is noted that Orora have an environment protection licence with the NSW Environment Protection Authority who enforce specific licence conditions relating to pollution prevention and monitoring, and cleaner production through recycling and reuse and the implementation of best practice. The main concerns for the nearest affected residents are related to noise and odour. Please see the Environmental Health comments below that should be submitted for consideration:

Odour Impact

The upgraded WTP and associated gas engine have the potential to increase odour levels and cause exceedances of air quality criteria at nearby sensitive receivers. An air quality impact assessment prepared by Todoroski Air Sciences Pty Ltd (Job number 16020537) dated 30 June 2016 was submitted with the application. The assessment concludes that while the upgraded WTP would result in higher odour levels at sensitive receivers the highest increase in odour levels would be about 0.1 OU which would not be detectable or measurable in actual practice. Therefore the upgraded WTP would not result in any perceptible change in odour at any sensitive receivers.

The conditions of consent in the original application (No. 05_0120) with regards to odour management have been reviewed and are considered appropriate for the current modification.

Acoustic Amenity

An operational noise impact assessment prepared by Hutchison Weller Pty Ltd (Doc no. 16002-NV-RP-2-0) dated 4 July 2016 was submitted with the application. The document states that based on the expected construction and location and equipment list for the WTP, there would be no exceedances of the site EPL and project approval noise goals with the upgrade of the WTP.

It is noted the McCauley Street precinct mainly constructed of 10 metre high prefabricated concrete panels located between the B9 Paper Mill and residences on Australia Street provide a new substantial noise barrier and would mitigate much of the noise from the upgraded WTP.

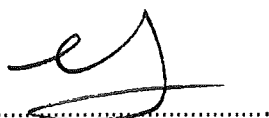
Orora will perform local noise measurements of the equipment related to the WTP within three months of practical completion. The resultant noise data will be confirmed against the original project assumptions and any modifications or additions of noise attenuation will be added to ensure compliance with the site Operational Noise Limits.

Should the Department of Planning and Environment intend to approve the proposed development in its current form, the recommended condition of consent shall be included:

An additional acoustic report, prepared by a suitably qualified and experienced consultant in acoustics, must be provided to the Department of Planning, NSW EPA and Randwick City Council within 3 months of practical completion. The resultant noise data will be confirmed against the original project assumptions and any modifications or additions of noise attenuation will be added to ensure compliance with the site Operational Noise Limits to demonstrate and confirm that the relevant provisions of the Protection of the Environment Operations Act 1997 and EPL are complied with.

If you have any further queries or wish to further discuss any of the issues raised above, please contact, Matt Choi in Council's City Planning Department, on 9399 0979.

Yours faithfully



Kerry Kyriacou
Manager – Development Assessment