07546
17 April 2008

Mr Sam Haddad
Director-General
Department of Planning
GPO Box 39
SYDNEY NSW 2001

Attention: Mr Chris Ritchie

Dear Mr Haddad

PRELIMINARY ENVIRONMENTAL ASSESSMENT
23 SCRIVENER STREET, WARWICK FARM LOT 1 DP 774089

In response to our letter of 26 November 2007 the Director-General, as delegate of the Minister for Planning, formed the opinion on 4 December 2007 that the proposed development at 23 Scrivener Street, Warwick Farm is a Major Project to which Part 3A of the *Environmental Planning and Assessment Act 1979* (the Act) applies.

The purpose of this letter is to seek, on behalf of the proponent - Independent Print Media Group Pty Ltd (IPMG), the Director-General's Requirements under Part 3A of the Act in relation to preparation of a Project Application. The following is the Preliminary Environmental Assessment (PEA) of the proposed development.

1.0 BACKGROUND TO IPMG AND THE PROPOSAL

1.1 Overview of IPMG

IPMG is the market leading print group in Australia with plants located in Sydney, Melbourne and Brisbane. With its origins dating back to the late 1800s, its operations have grown into a multi million dollar integrated printing group extending from pre-media through to distribution. IPMG's printing companies together make up the largest privately held print group in Australasia with operations specialising primarily in heat set web offset products (HSWO), a broad range of high quality sheet fed machines and other ancillary equipment.

IPMG is looking to expand and develop its business in Western Sydney. The proposal involves the modification, refurbishment and extension of the existing Kimberley Clark manufacturing plant into a new facility for print production, warehousing and distribution, approximately 40,250 square metres in area. The plant will produce a variety of printed products including magazines, inserts, direct mail material, brochures, books and the like.

1.2 Need for the project

In considering the next phase of expansion and development, IPMG has spent significant time over a two year period investigating and evaluating the introduction to the Australian print marketplace of gravure printing specifically for magazines and catalogues.

Although the current proposal for gravure printing would be the first of its kind in Australia, it does not come with the traditional risks of introducing new technology into a marketplace. Current gravure printing technology has been used in Europe for nearly 50 years, with in excess of 150 machines specifically for catalogue and magazine production having been sold in Europe and the USA since 1991.

In Europe and USA all major printers and the majority of publishers of high quantity product use the process and access the advantages that gravure offers over other print methods. The following are some of the key advantages of a gravure plant:

- Presses produce 120 printed pages in one pass.
- Significant savings can be made on current printing lead times.
- Lighter weights of paper can be used without any loss of print quality.
- There is a significant reduction in paper waste due to the variable cut off which enables print cylinders to be tailored to the right size for the designated job.
- The environmental footprint of a gravure plant is well under that of a similarly equipped heatset plant.

For IPMG's business, a Rotogravure plant fits well with, and complements, its existing heatset web offset (HSWO) printing plants.

1.3 The Rotogravure printing process

The gravure printing process has been used in Europe and the USA for close on a century for the production of long run high quality printed material. The process involves two key elements to achieve the printed product, firstly cylinder production and secondly the printing press.

The cylinder

The cylinder consists of a copper covered steel tube of varying diameter and length, depending on the work to be produced. The copper covering is electro mechanically etched to produce a series of tiny cells from 2 to 5 microns in depth covering approximately 35,000 cells per square centimetre. These create the image to be printed. After the cylinder is etched the surface is hard chromed to give it resilience against mechanical damage whilst rotating on the press.

The press

The finished chromed cylinder is mounted into the gravure press printing unit where it is immersed and rotated in a bath of ink. The liquid ink fills the cells and surplus ink is removed from the rotating cylinder surface via a doctor blade (squeegee) leaving only the ink retained in the cells to be delivered to the paper by the rotating cylinder.
Paper up to 3.2 metres in width is pressed by a roller onto the cylinder where the ink is transferred to the paper. The wet ink is dried by hot air circulating in a chamber over the printing unit and the dried paper continues through the process until it is cut and folded into the finished product.

Difference between Rotogravure and HSWO printing

Rotogravure printing differs from HSWO as it is uses a direct method of ink transfer of image from cylinder to paper and printing inks are dried immediately after application.

Rotogravure presses can print on paper widths up to 4 metres in width, while HSWO presses are only available in widths up to 2.5 metres.

Rotogravure presses can run up to 20% faster than the HSWO presses and offer greater output for less energy compared to a conventional HSWO press.

2.0 THE SITE AND LOCATION

The 7.938 hectare site is located in an industrial area at Warwick Farm in the Liverpool local government area as shown in **Figure 1** (attached). The site is bounded by the Main Southern railway on its western side, Priddle Street to the north, Scrivener Street and small industrial units to the east, and the Liverpool Hospital car park to the south.

The site contains a large warehouse type building, approximately 3.5 hectares in area, currently owned and operated by Kimberley Clark for the manufacture, storage and distribution of paper products. The current operation is winding down and Kimberley Clark is relocating elsewhere. The existing building was built in the early 1970s and extended in the 1980s. It has been very well maintained, has a full fire sprinkling system, has double insulation in the roof areas and the manufacturing area is air conditioned.

Surrounding uses include a range of large industrial operations (including Visy Australia), light industrial units, stables associated with Warwick Farm Racecourse (currently zoned residential 2(b) Racecourse), and ancillary buildings and parking associated with Liverpool Hospital – illustrated at **Figure 2** (attached).

It should be noted that NSW Health has adopted a master plan for the long term redevelopment of Liverpool Hospital. Neither this development nor the proposal for 23 Scrivener Street will impact on each other.

3.0 THE PROJECT

3.1 Proposed development

The project involves the modification, refurbishment and extension of an existing manufacturing plant into a new 40,250 square metres plant for printing, warehousing and distribution. The capital investment value of the project is $100M. The components of the plant are illustrated in **Figure 4** - attached.

In summary, development will involve

- Refurbishing and fitting out the existing 35,230 square metre building to incorporate:
  - a press room and bindery – approximately 13,400 square metres (**Areas B, C** and **G**);
  - materials storage and distribution areas – approximately 19,120 square metres (**Areas A, F, J** and **K**); and
  - offices and amenities – 1,900 square metres (**Area N**).
- Raising part of the existing roof from 8 metres to 12 metres and 14 metres – shown in **Figure 3**.
- Constructing an extension of 4,000 square metres in total for a future warehouse (**Area L**).
- Constructing a 2,280,000 litre underground water storage tank for water recycling (see **Area O**). This water will be primarily used for garden irrigation and toilet flushing, and may also be utilised, once purified, for printing cylinder preparation.

- Installing a vapour recovery and ink supply system (**Area D**).
- Constructing a waste paper collection area of 630 square metres (**Area I**).
- Relocating fire service tanks and pumps (**Area M**).
- Extending the internal road system to create a circular truck access route.
- Installing three rotary printing presses (**Area C**).

A range of raw materials will be stored on site including around 25,000 tonnes of paper rolls (at any one time), as well as ink, solvent, acid, alkaline and plating materials (see Section 4.3).

Construction is expected to commence in late 2008/early 2009 with completion and commissioning by late 2009.

3.2 The printing process

The following detailed description of the proposed print production process is cross referenced to **Figure 4.**

Step 1: Paper receiving and storage

- The 7000 square metre paper store (**Area A)** is capable of storing 22,750 tonnes of paper at anytime.
- Paper is delivered in rolls by semi trailer to the south East factory apron where it is unloaded by forklift to the paper store. The rolls are up to 3180 mm in height, 1350 mm in diameter and 5.3 tonnes in weight. The paper is stacked up to 9.54 metres high in four blocks of 25 rows.

Step 2: Cylinder preparation

- Printing cylinders electromechanically etch the image to be printed onto an electroplated copper cylinder 3.2m wide (see **Area B**). The cylinder is hard chrome plated and stored, ready for distribution to the press room.
- The cylinder etching and preparation equipment machine is capable of processing up to 5,400 printing cylinders per year.

Step 3: Printing process

- Printing takes place on three 8 unit Rotogravure presses located side by side – see **Area C**.
- Each press is capable of processing over 45,000 tonnes of paper annually and producing up to 112,000 items per hour for catalogue and magazine production.
- The paper rolls are automatically delivered from the paper store to the reel loaders at the rear of the press where they are prepared for unwinding. They are then mounted on the reel stand and the press pulls the paper from the rolls into the printing units located at the back of the reel stand. The paper is then printed in full colour in a continuous process.
- The folder then slit cuts the printed web of paper into smaller width ribbons and folds them into smaller sizes ready for stacking. The folder is capable of delivering various permutations of folded product depending on the style of magazine or catalogue being produced.

Step 4: Vapour recovery

- The purpose of the vapour recovery system (**Area D**) is to remove the ink carrier solvent produced by the ink drying process at the printing presses.
- The unit consists of 5 vessels, each 3.5 metres in diameter and 17 metres in length, located at the southern wall of the factory. Solvent laden air is pumped through the vessels sequentially

and then beds of activated carbon, located in the centre of the vessels, recover the solvent allowing cleaned air to exhaust.

- After each process cycle (of approximately 40 minutes) the carbon is cleaned and reactivated by pumping steam through the tank supplied from two package boilers located near to the recovery system.
- Solvent is recovered from the steam first by cooling, and then by phase separation where the water is recovered, polished and then returned to the boiler.
- Recovered solvent is stored and reused in the print process, or can recovered for reuse by ink manufacturers, so creating a closed loop supply chain.

Step 5: Stacking and storage

- Folded product is conveyed from the folder to the stacking equipment located to the north of the presses (see **Area E**).
- The stackers take the individual pieces of folded product and place them one on top of the other forming a log of product consisting of 600 to 1200 pieces. Product is strapped and placed flat on pallets for storage awaiting collation with other magazine sections.
- Product that does not require collating with other sections can be stitched/glued and trimmed at the press prior to stacking in bundles of 50 to 300, as required, to suit customer needs. They are then palletised at the stackers ready for local or interstate dispatch.
- Product from the presses is stored in the intermediate racked storage area (**Area F**) whilst other sections of the same magazine are printed. This area consists of 8 double rows of pallet racks holding a total of 1660 pallet spaces.

Step 6: Binding

- Two high speed collating and stitching lines (see **Area G**) process the stored product from the presses, collate up to 7 printed sections together, stitch (staple) them, and then trim the folded edges away from the collated sections to create a magazine with 3 open sides and a stapled spine ready for distribution.
- Each stitching machine can produce in excess of 25,000 items per hour.

Step 7: Waste paper management

- Paper waste and dust is conveyed via fan and duct to the waste paper system located next to the southern driveway (**Area I**). The equipment in this area separates any paper dust and bales the paper off-cuts ready for transport to external recycling.
- The waste paper bailers are capable of handling up to 6 tonnes of material per hour.

Step 8: Dispatch

- Finished product from the press room and binding section is stored and dispatched onto trucks for delivery by road out of the plant (from **Areas H, K and L**).
- Publications which are to form mixed bundles are sent for collation to **Area J** where other magazines and materials are collated and packed with other items for distribution to newsagents and others as required.

3.3 Transportation of goods

It is intended that shipment of raw materials to the site and distribution of finished products will be by road. Proposed truck movements will average 16 B-double vehicles per day (8 in and 8 out) – less than the current Kimberley Clark average of 18 B-doubles per day.

There may be potential in the longer term for goods to be transported by rail. However, this is subject to detailed negotiation with, and planning by, Australian Rail Track Corporation Ltd (ARTC) and RailCorp. This is not contemplated at present and is not part of this proposal.

3.4 Employment and hours of operation

The site will operate on a 24 hour 7 days per week basis and will employ approximately 140–150 full time equivalent staff over three shifts. Of these, approximately 70 people will be on site at any one time.

4.0 RELEVANT PLANNING PROVISIONS

The site is zoned 4(a) Industrial under Liverpool Local Environmental Plan (LEP) 1997. Industries, warehousing and distribution are all permissible with consent in the zone; accordingly the proposed development is permissible. It should be noted that warehousing and distribution are ancillary to the main use which is printing.

Draft Liverpool LEP 2008 is currently on exhibition. The subject site is zoned IN1 General Industrial under this plan and the proposed use is permissible with consent.

The following environmental planning instruments apply to the site and the proposed development:

- Greater Metropolitan Regional Environmental Plan No. 2 Georges River Catchment;
- State Environmental Planning Policy – Major Projects 2005;
- State Environmental Planning Policy (Infrastructure) 2007;
- State Environmental Planning Policy No. 55 - Remediation of Land;
- Liverpool Local Environmental Plan 1997;
- Draft Liverpool Local Environmental Plan 2008;
- Liverpool Development Control Plan 3 - Parking and Service Provisions;
- Liverpool Development Control Plan 6 - Industrial Development;
- Liverpool Development Control Plan 46 - Waste Not.

At this stage of project development the proposal will comply with all relevant statutory provisions and Liverpool Council development controls.

5.0 KEY ISSUES AND ENVIRONMENTAL RISK ANALYSIS

The following section outlines the key issues and impacts potentially arising from the proposed development. Each of these matters is discussed below and will be addressed in detail in the Environmental Assessment Report (EAR) that will accompany the Project Application.

- Flood risk
- Noise
- Hazards, air quality and emissions associated with the printing process
- Traffic.

5.1 Flood risk

The site is located within the Georges River floodplain and is potentially affected by flooding. Information on flood behaviour at the site is available from the Georges River Flood Study (Public Works Department, 1991) and the Georges River Floodplain Risk Management Study and Plan (Bewsher Consulting, 2004).

The site is located partly within a "Medium Flood Risk" area and partly within a "Low Flood Risk" area. The floor level of the existing building is approximately 0.4m above the estimated 100 year flood level, while part of the perimeter of the site is below the estimated 100 year flood level.

The use of any area that may be affected by flooding will be addressed in further studies, in accordance with the principles of the NSW Government's Flood Prone Land Policy and the Georges River Floodplain Risk Management Study and Plan. The key flood risk management issues discussed below will be addressed in the EAR.

Impact of the proposed development on flood behaviour

The proposed additions or alterations to the site have the potential to effect flood behaviour. The majority of existing properties between the site and Governor Macquarie Drive are subject to flooding in a 100 year event. Any increase in flood levels or frequency of flooding could have a detrimental impact on these properties.

Flooding occurs when the banks of the Georges River are overtopped near the Liverpool Sewerage Treatment Plant and floodwater backs up behind Governor Macquarie Drive. The subject site is affected by backwater flooding and any impact from the development on flood behaviour will be due to loss in flood storage. Any loss in flood storage due to the proposed works will be calculated and compensatory excavation proposed within the site to ensure no net loss in flood storage.

Minimum Floor Levels

The floor level of any proposed additions or other refurbished areas should be at an appropriate level to minimise the potential for flood damage. Flooding above floor level could disrupt operations and potentially damage building fixtures, print equipment and goods stored on site.

The existing building has a floor level that is approximately 0.4m above the 100 year flood level. The Georges River Floodplain Risk Management Study and Plan recommends a minimum floor level of 0.5m above the 100 year flood for offices or areas used to store materials susceptible to flood damage. Any additions or substantially refurbished areas are proposed to be constructed 0.5m above the 100 year flood.

Parking and Access

Parking and access conditions should be at an appropriate level to minimise the risk of damage to motor vehicles and to avoid evacuation difficulties from the site.

The Georges River Floodplain Risk Management Study and Plan recommends the minimum car parking level for open space car parking to be no lower than the 20 year flood level, and that the driveway providing access between the parking area and the road to generally rise in the egress direction. Parking conditions will be reviewed to ensure compliance with the above requirements.

Evacuation/Flood Warning

Occupiers of the premises need to be able to evacuate safely the site during floods. Whilst the floor level of the existing building is already above the 100 year flood, the surrounding area may be inundated, potentially trapping occupants within the building unless early

evacuation of the premises is undertaken. Potentially, more extreme floods could inundate the building.

Vehicular evacuation of the premises will be reviewed and critical flood levels along this route determined. A flood warning/evacuation plan that is tied to flood warning predictions provided by the Bureau of Meteorology for the Georges River will be prepared.

Storage of Chemicals or hazardous materials

Flooding of chemicals or other hazardous substances stored on site could potentially result in environmental damage to the Georges River, including reduced water quality and risk to aquatic and human life. All chemicals or other potentially hazardous materials are proposed to be securely stored at least 0.5m above the 100 year flood level and contained within the structure.

Overall, the issues associated with flooding are considered of moderate significance and risks can be managed through design and an evacuation plan.

5.2 Noise

There are a number of sensitive noise receivers in the locality of the site. However, the proposed use of the site differs very little from the existing use and any potential noise from the proposed extension described below can be controlled and managed.

The following acoustic issues pertaining to the construction and operation of the proposed development have been identified by Heggies:

- Noise from the industrial buildings and associated fixed and mobile equipment (including mechanical ventilation, loading dock activities, delivery vehicles, etc) impacting on nearby residential and other noise sensitive receivers.
- Noise from potential additional traffic movements.
- Noise from construction activities.

Noise from the following sources will be addressed and assessed in the EAR:

- mechanical plant noise from building services such as air-conditioning plant and ventilation fans;
- industrial noise from printing presses and other machinery;
- possible additional road traffic generated by the operation of the premise by IPMG;
- loading dock activities such as people shouting, banging of crates;
- truck and forklift movements such as reverse beeping, engine braking etc; and
- construction of the new building.

The following noise sensitive receivers have been identified in the area surrounding the site:

- Liverpool Hospital (to the south west);
- Liverpool Boys High (to the west);
- Liverpool Girls High (to the west); and
- stables and associated residential premises (to the north).

To assess and address the potential acoustic issues, the location of nearby noise sensitive receivers will be identified and confirmed; noise logging to be conducted at the site and the noise sensitive receivers; spectrum noise measurements will be conducted; appropriate noise

goals for the development will be established; and all noise sources will be analysed in relation to the receivers.

If controls are required to achieve noise goals at the corresponding receivers, they could include boundary noise barriers, enclosures for mechanical plant, architectural design of loading dock, building fabric insulation and a noise control management plan.

The noise impacts can be controlled and managed and are considered to be of moderate significance.

5.3 Hazards, air quality, emissions and odour

This section of the PEA addresses air quality and the potential hazards associated with the chemicals and processes used in the proposed printing process. The question as to whether the printing process and the chemicals used and stored on site trigger any of the SEPP 33 Screening Threshold Quantities is also addressed.

Chemical usage rates and storage

Paper rolls, ink, solvent, acid, alkaline and plating materials will be stored on site.

The Dangerous Goods classification and proposed usage rates per month of the chemicals associated with the proposed printing and plate preparation process are as follows:

- Toluene - 3PGII — 186 cubic metres
- Chromic Acid -8PGII or 8PGIII — 0.92 cubic metres (500g/L solution)
- Sulphuric Acid (98%) – 8/6.1PGI — 0.12 cubic metres
- Sulphuric Acid (2%) – 8PGII — 7.1 cubic metres
- Spent Acid – 8PGII — 8 cubic metres (approx)
- Chromic Acid – 5.1/8PGII — 0.46 tonnes (solid).

The Screening Threshold Quantities as specified by SEPP 33 for the storage of the above chemicals are as follows:

- Toluene — 22 metres to boundary
- Chromic Acid (solution) — 25 – 50 cubic metres
- Sulphuric Acid (98%) — 5 or 0.5 cubic metres (8 or 6.1 PGI)
- Sulphuric Acid (2%) — 25 cubic metres
- Spent Acid — 25 cubic metres
- Chromic Acid — 5 or 25 tonne (5.1 or 8 PGII).

Based on the above data, Stephenson Environmental Management has concluded the following in relation to SEPP 33:

- All acids, both solid and solution, do not trigger SEPP 33 Screening Threshold Quantities.
- Toluene storage (186 cubic meters per month) will not trigger SEPP 33 Screening Thresholds provided the minimum buffer distance to the boundary exceeds 22 meters. The current design is 31.6 metres to the nearest boundary.
- The number of trips and quantities of Dangerous Goods classified chemicals per trip will not trigger SEPP 33 Transportation Screening Thresholds.

Emissions to atmosphere and odour

The printing and printing plate production process has the potential to release emissions of toluene and acid gases into the atmosphere.

The plant will be designed to include appropriate safeguards to enable compliance with the relevant *Protection of the Environment Operations Act 1997* (POEO Act) Clean Air Regulation limits. To achieve compliance with Regulation emission limits four Vapour Recovery Units (VRU) are proposed to control emissions and also to recover the toluene solvent which is used in the printing process to dilute the ink. This recovered solvent can be reused by ink manufacturers or sold to solvent reprocessors. The VRU's will also control the odour emissions associated with the toluene volatile solvent.

The advantages of a VRU over thermal oxidation techniques for VOC and odour control are twofold. Firstly, reusable solvent (toluene) is recovered rather than burnt, and secondly, Greenhouse Gas Emissions are substantially reduced with the VRU technology.

Similarly, the acid gas and chrome emissions will be extracted from the plating process and collected prior to emission to atmosphere utilising proven wet scrubbing pollution control techniques. At least two of these 3-stage devices will be used.

Based on the above, Stephenson Environmental Management has concluded as follows:

- Emissions to atmosphere of Volatile Organic Compounds (VOC's) such as toluene and associated odours will be controlled by four VRUs. These VRUs will recover the solvent used in the printing process for reuse. The emissions to the atmosphere from the VRUs will comply with the POEO Act Clean Air Regulation limit for new plant (Group 6) of 40 milligrams per cubic metre (referenced to n-propane).
- Emissions of acid gases such as chromic and sulphuric acid will be collected and neutralized in three stage packed tower wet scrubbing pollution control devices. Emissions from these devices will comply with POEO Act Clean Air Regulation limits of 100 milligrams per cubic meter for sulphuric acid mist and 1 milligram per cubic metre for chrome (in aggregate with any other heavy metals known as Type 1 and Type 2 substances). Similar plants are operating throughout Europe and emission test results can be provided to verify the above conclusions.
- Odour is not expected to be detectable at the boundary of the site because the VRUs will control emissions of toluene - the most odorous VOC in this process.
- Recovered toluene will be removed from site via bulk road tanker with some 5 to 6 trips per month proposed. This toluene will be reused by ink manufacturers or sold to solvent reprocessors.

In addition to the above, acid waste from the gas scrubbing process will be treated on-site in the waste water treatment plant. Residue from this plant will then be collected by contract recycler for reprocessing. All paper will be recycled.

The proposed development will not be able to operate without the controls described above being in place. Accordingly, the issues raised above are considered of a minor nature and, as demonstrated, all are able to be managed through design and the application of appropriate technology.

5.4 Traffic and access

As described above the proposed development will generate truck and general traffic movements commensurate with the current (Kimberley Clark) operation on site. Accordingly, it is unlikely that there will be any impact on road and intersection capacity as a result of the proposal and the issue of traffic and access is considered to be of low significance.

The transport/traffic and parking issues that will be addressed as part of the EAR will include:

- Details of the anticipated daily and peak traffic movements to be generated by the development including the impact on nearby intersections and the access intersection connecting with the arterial road network.
- Identification of any upgrading work to the road network associated with the development and the source of funding for such works. Given that the level of vehicle activity is not going to be dissimilar to the existing use, it is unlikely that there will be any need for road improvement works.
- Details of strategies for encouraging use of public transport and cycling for journey to/from work purposes. It is noted that Warwick Farm Station is located around 450 metres north of the site.
- Assessment of the proposed car/truck parking and loading dock provisions in terms of the adequacy to accommodate demand. In particular this will require an assessment as to the adequacy of the car park to accommodate demand at change of shifts.
- Assessment of the layout of the internal circulation roads and car parking areas in terms of compliance with relevant standards and suitability to accommodate circulation by B-double size vehicles.
- Details of the bicycle facilities to be incorporated into the development.

6.0 CONSULTATION

6.1 Public authorities

The proponent has commenced preliminary consultation with a number of relevant public authorities as described below.

- **Liverpool City Council**: Discussions were held regarding development control matters and to ascertain any issues regarding the proposed use of the site. No issues were identified.
- **Department of Environment and Climate Change** (DECC): DECC was consulted in relation to the proposed development needing to be licensed under the POEO Act. Subsequent to the meeting JBA received advice from DECC indicating that the proposed operation would not be a scheduled activity (under Schedule 1 of the POEO Act) and that as a consequence DECC would not regulate the premises. DECC was of the opinion that Liverpool Council will be the Appropriate Regulatory Authority (ARA) for environmental matters once the printing plant is operational. The relevant correspondence is located at **Attachment 5** for your information.
- **Australian Rail Track Corporation Ltd and RailCorp:** These two corporations were consulted by IPMG in relation to the possible use in the future of a rail siding off the planned Southern Sydney Freight Line. Discussions to date indicate that technically a spur line can be constructed off the main line to join the existing siding on the site. This is not part of the current project and will be considered by IPMG at a later date.

In addition to the above, neighbouring institutions such as Liverpool Hospital and Liverpool Girls and Liverpool Boys High Schools, will be consulted during the preparation of the EAR.

6.2 Community

The proposed development at 23 Scrivener Street may cause some disturbance to the surrounding community. Community concerns will be confirmed through the consultation process and could potentially include concerns about:

- continuity of existing noise levels associated with truck and vehicle movements to and from the site;
- noise associated with the operation of machinery and other equipment;
- odour associated with the printing process;

- perceived loss of green space associated with the erection of new buildings/extension of buildings on the site;
- temporary impacts during construction such as dust, noise, traffic and parking;
- night-time noise associated with 24-hour operations; and
- perceived additional truck movements.

A community consultation process underpinned by clear communications with the local community will assist in identifying any potential concerns at the environmental assessment stage and provide the proponent with the opportunity to manage the concerns raised with the goal of being a good long-term neighbour in this community. Strategies to minimise, manage or mitigate these impacts – if any - will be identified and documented in the environmental assessment.

The community consultation process will be guided by the NSW Department of Planning's Guidelines for Major Project Community Consultation. A community consultation and communications strategy will be prepared at the commencement of the assessment process and will include the identification of key stakeholders, appropriate consultation activities and an implementation program. The community consultation process will adopt the following approach:

- A range of stakeholders will be targeted including those directly affected by the proposal, as well as other stakeholders and organisations that may have an interest in the project.
- A variety of consultation and communications activities will be implemented to target the specific needs of the community. Activities to provide feedback (such as feedback forms, submissions, 1800 line) and to provide opportunities to discuss the project (such as briefings) will be included in the program.
- The timing of consultation activities will allow adequate opportunities for people to participate, and consultation will be based on genuine respect for people's views and on being upfront about what is and what is not negotiable.
- The outcomes of the consultation, including the objectives, activities undertaken, findings and an analysis of the issues raised, will be recorded and reported in the EAR.

Community reaction to the proposal is not considered a key issue and is likely to be of low significance given the current industrial zoning of the land, the current use/activity and the fact that the proposal differs little from the current operation.

We trust that the information provided in this letter is sufficient to enable the Department to establish the level and scope of assessment required for the EAR for this Part 3A Project Application. Should you have any queries, please do not hesitate to contact me on 9409 4927 or vgoldschmidt@jbaplanning.com.au. We look forward to receiving the DGRs.

Yours sincerely

Vivienne Goldschmidt
Associate

Attachments