

ALEXANDRIA WASTE TRANSFER STATION

Scoping Report

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BINGO INDUSTRIES ALEXANDRIA WASTE TRANSFER STATION

Scoping Report

Final Report

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This report has been prepared for Bingo Industries in accordance with the terms and conditions of appointment for Alexandria Waste Transfer Station dated June 2021. Arcadis Australia Pacific Pty Limited (ABN 76 104 485 28976 104 485 289) cannot accept any responsibility for any use of or reliance on the contents of this report by any third party.

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EXECUTIVE SUMMARY

Bingo Industries Limited (Bingo) is seeking to develop a site at 84 Burrows Road Alexandria, NSW for the purposes of operation of a putrescible waste transfer station that handles up to 180,000 tonnes per annum (tpa) of waste from commercial and industrial (C&I) and municipal solid waste (MSW) markets (the Proposal).

The facility is proposed for an existing industrial location and would incorporate a new purpose-built warehouse building for the receipt and handling of putrescible C&I and MSW waste from inner Sydney locations prior to bulk transfer to established advanced waste processing and disposal facilities. The Proposal would improve logistics efficiencies for the handling of putrescible waste, support the diversion of organics from landfill and enhance resource recovery outcomes whilst also supporting the targets and priorities established in the *NSW Waste and Sustainable Materials Strategy 2041* (DPIE, 2021). The Proposal would support and contribute to a circular economy, while contributing significantly to an overall 80 per cent recovery rate from all waste streams by 2030.

The Proposal would be considered State Significant Development (SSD) under Clause 23 (waste transfer station handling >100,000 tpa) of Schedule 1 of the *State Environmental Planning Policy (State and Regional Development) 2011* and therefore requires the preparation of an Environmental Impact Statement (EIS) and consent from the Minister for Planning and Public Spaces. This Scoping Report seeks to inform the Request for Secretary's Environmental Assessment Requirements (SEARS) for the EIS. A preliminary screening of environmental issues was undertaken to identify the matters for consideration for further assessment and has identified minimal environmental impacts associated with the Proposal. Additional assessment requirements proposed for review within the EIS include:

- **Traffic:** The Proposal is considered a Traffic Generating Development
- **Air:** Odour, dust and vehicle emissions would be generated with potential to impact on nearby sensitive receivers
- **Noise and Vibration:** Traffic and transfer operations could result in noise impacts to surrounding receivers
- **Water:** Stormwater runoff may impact surrounding areas including the adjacent Alexandra Canal. The Proposal site is also located in a Declared Coast Environment Area under *Coastal Management Act 2016* and is mapped as flood prone
- **Soil and contamination:** The land has designated Class 3 Acid Sulfate Soils and is adjacent Alexandra Canal which is listed on the Contaminated Land Register
- **Heritage:** The adjacent Alexandra Canal is listed on the State Heritage Register but no items or areas of Aboriginal heritage were identified within or in close proximity to the Proposal site.

Bingo is committed to engaging with the local community and relevant stakeholders to ensure a transparent development process is conducted, with minimal harm and disruption to the local environment and surrounding community. The EIS will provide a thorough consultation process and allow stakeholders to work with the development to achieve transparency and a development that supports the surrounding community and amenity.

Bingo is seeking consent for the Proposal under Division 4.7 of Part 4 of the EP&A Act. The application for approval will be supported by an EIS. This Scoping Report provides information about the proposal and the existing environment of the site and surrounding area as an input to the preparation of SEARs by the DPIE. The EIS will address each of the SEARs and will describe how the design, construction and operation of the proposal will avoid, minimise and manage impacts on the environment, including issues that may be of concern to the community and stakeholders.

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APPENDICES

APPENDIX A – PROPOSED DESIGN INCLUDING CROSS SECTION

APPENDIX B - BIODIVERSITY ASSESSMENT REPORT WAIVER

Glossary

Term	Definition
AQIA	Air Quality Impact Assessment
ARI	Average Recurrence Interval
BC Act	<i>Biodiversity Conservation Act 2016</i>
CEMP	Construction Environmental Management Plan
C&I	Commercial and Industrial
<i>CLM Act</i>	<i>Contaminated Land Management Act 1977</i>
COS	Council of the City of Sydney
DECC	NSW Department of Environment and Climate Change
DPI&E	Department of Planning, Industry and Environment
EIS	Environmental Impact Statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
GHG	Greenhouse Gas
ISEPP	<i>State Environmental Planning Policy (Infrastructure) 2007</i>
LEP	Local Environment Plan
MSW	Municipal Solid Waste
OEMP	Operational Environmental Management Plan
PHA	Preliminary Hazard Analysis
POEO Act	<i>Protection of the Environment Operations Act 1997</i>
RRF	Resource Recovery Facility
SEARs	Secretary's Environmental Assessment Requirements
SEPPs	State Environmental Planning Policies
SSD	State Significant Development
The Proponent	Bingo Industries Limited
The Proposal	The development for which approval is being sought
tpa	tonnes per annum
WARR Act	<i>Waste Avoidance and Resource Recovery Act 2001</i>
WHS	Work health and safety

Alexandria Waste Transfer station

Term	Definition
WSUD	Water Sensitive Urban Design

1 INTRODUCTION

1.1 Overview

Bingo Industries Limited (Bingo) is seeking development consent for the construction and operation of a putrescible waste transfer station (the Proposal) that services the commercial and industrial (C&I) and Municipal Solid Waste (MSW) markets. The Proposal is located at an existing industrial location at 84 Burrows Road Alexandria (the Proposal site). The Proposal would incorporate a new purpose-built warehouse building for the receipt and handling of putrescible C&I and MSW waste from Sydney locations prior to bulk transfer to established waste disposal and processing facilities, with the aim of improving logistics efficiencies for the handling of putrescible waste and enhancing resource recovery outcomes. The warehouse building would be fully enclosed and utilise state-of-the-art equipment to suppress any dust and odour generation.

The Proposal would assist in providing critical resource recovery infrastructure identified in *the NSW Waste and Sustainable Materials Strategy 2041* (DPIE, 2021) to assist in the achievement of a 50 per cent reduction in the diversion of organic waste material being sent to landfill and an overall 80 per cent average recovery rate from all waste streams by 2030. The Proposal would also contribute to at least meeting the 70 per cent recycling rate from C&I and MSW waste streams for the financial year 2022 and beyond. During the financial year of 2019, an estimated 2.5 million tonnes of organic waste (such as food organics, garden organics, timber and textiles) was sent to landfill. Emissions from organic waste decomposing in landfill make up more than two per cent of total net annual emissions in NSW. Increased diversion of organics from landfill are an important first step towards reducing emissions from waste.

The NSW Waste and Sustainable Materials Strategy: A guide to future infrastructure needs (2021) states that putrescible waste transfer stations are needed in highly urbanised areas. These areas account for the majority of putrescible waste and the highest need for infrastructure to support this waste stream. The 2030 needs outlined in the report mention the need for waste transfer stations to service the Greater Sydney area. The Proposal would directly support the NSW Government in meeting these infrastructure requirements.

The Proposal would accept up to 180,000 tonnes per annum (tpa) of waste and would therefore be 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) 2011*, which refers to:

(2) Development for the purpose of waste or resource transfer stations in metropolitan areas of the Sydney region that handle more than 100,000 tonnes per year of waste

The purpose of this SSD Scoping Report is to provide documentation in support of a Request for Secretary's Environmental Assessment Requirements (SEARs) for the Proposal, which would inform the preparation of an Environmental Impact Statement (EIS) under Part 4, Division 4.7 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

This Report which has been prepared consistent with the *State Significant Development Guidelines – Preparing a Scoping Report* (Department of Planning, Industry and Environment (DPIE), 2021a), including:

- Introduction and overview
- Strategic context (Section 2)
- Proposal description (Section 3)

- Statutory context (Section 4)
- Key matters requiring further assessment in the EIS and the assessment proposed of impacts of key matters (Section 5 and Section 6)
- Other matters requiring no further assessment in the EIS as the impacts are small scale (Section 7)
- Community engagement (Section 7.5 and Section 8)
- Proposed approach to engagement during the EIS preparation (Section 8).

1.2 The Applicant: Bingo Industries

Bingo is an Australian entity, majority owned by Macquarie Infrastructure and Real Assets and its managed funds which employs over 700 staff that manage and operate a fleet of over 200 modern collections and operations vehicles, carrying out thousands of services a day to a diverse set of customers.

The Company's operations include a network of strategically located resource recovery and recycling facilities in NSW and Victoria. The Proposal would further strengthen Bingo's waste management infrastructure in Sydney, complementing its existing network by providing a means of treating waste streams that are currently subject to sub-optimal levels of recycling and recovery and reducing the volume of waste going to landfill.

1.3 Proposal site location

The Proposal site is located within an existing industrial area at 84 Burrows Road Alexandria (Lot 1 DP867774), approximately five kilometres (5 km) from the Sydney Central Business District (CBD) within the Council of the City of Sydney local government area (LGA). The fully fenced site is owned by Bingo and currently houses a warehouse building, used for storing skip bins and commercial vehicles and associated office facilities in addition to car park facilities. The Proposal site location in the regional context is shown in Figure 1-1.

The Proposal site covers an area of 7,400 square metres (m²) on land zoned IN1-General Industrial under the *Sydney Local Environmental Plan 2012* and abuts the Alexandria Canal, as shown in Figure 1-2 (Local Context). The Proposal site has a street frontage of 73 m and is consistent with other neighbouring uses, which include a recycling centre, metal recycling facility and electricity substations. Street front vegetation provides a visual barrier between the facility and the road. This is also true along the Alexandria Canal where a stand of trees is present between the existing building and the canal.

Access to the Burrows Road site is via Campbell Road from the south or Huntley Street from the north. Main arterial road access to this location is via either Southern Cross Drive to the east or Princes Highway to the west. Sydney Airport is located 2 km to the south of the Proposal site.

The following sensitive receptors have been identified in the vicinity of the Proposal:

- Childcare Centre – 95 Burrows Road, opposite proposal site (<50 m).
- Childcare Centre- 4 Huntley Street, across Alexandria Canal (~150 m)
- Sydney Park – Recreation facility, Euston Road (<250 m)
- Residential dwellings – Sydney Park Road (~250 m).

The nearest residential area is approximately 250 m to the north-west of the Proposal at the corner of Euston Road and Sydney Park Road, with a number of industrial facilities located between the Proposal site and these residential areas.

Bingo operates a Recycling Centre on the property adjacent to the Proposal location at 76 - 82 Burrows Road Alexandria. That facility is not part of this application and will be operated in isolation of this Proposal.

Alexandria Waste Transfer station

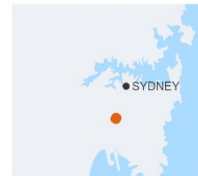


Figure 1-1 Area context



Legend

- Proposal site
- Property boundary



1:1,500 at A4
 Coordinate System: GDA2020 MGA Zone 58
 Data issued: December 16, 2021
 Imagery: © Department of Customer Service 2020



Path: C:\Users\emaz466@ARCADIS\30993727 - Alexandria WTS Scoping Report - GIS\A_Current\B_Maps\AlexandriaWTS_ScopingReport.aprx
 Created by: LG Updated by: EM OA by: SB

Figure 1-2 Local Context

1.4 Existing Approvals and Environmental Protection Licences

Two existing development applications were identified for the Proposal site and were approved with conditions:

- D/2006/2318 - Extension of operating hours for courier distribution facility to permit 24-hour operation. Determined in February 2007.
- D/2015/890 - Internal fit out and use of an existing warehouse for truck parking, workshop depot, bin storage and administration office. Determined in September 2015.

It is anticipated that any existing DA's in place at the site would be relinquished upon approval of this application.

An application for an Environmental Protection Licence (EPL) will be made as part of the approvals process.

1.5 Purpose of this report

Based on the proposed receipt of up to 180,000 tpa of waste, the Proposal is deemed State Significant Development (SSD) on the basis that it satisfies Clause 23(3) in Schedule 1 of the *State Environmental Planning Policy (State and Regional Development) 2011*.

This report has been prepared to support a request for SEARs for the Proposal, which would inform the preparation of an EIS under Part 4, Division 4.7 of the EP&A Act.

This report provides an outline of the existing site operations, stakeholder engagement, strategic context, statutory approvals and a description of the proposed development as well as the identification of key potential environmental issues that may be associated with the Proposal.

2 STRATEGIC CONTEXT

The objectives of the Proposal are to:

- Provide Sydney with a key piece of infrastructure that facilitates the sustainable management of putrescible and non-putrescible C&I and MSW waste
- Contribute to the goal of net zero emissions from organic waste by 2030, as presented in the *NSW Net Zero Plan Stage 1: 2020–2030*
- Contribute to the principles of a circular economy through implementation of a pull-through model that conceives of the sorting, reprocessing and specified end uses of processed materials as an integrated, closed loop solution
- Support the extension of landfill capacity within Sydney for waste that cannot be recycled or reused that need to go into landfill
- Support the infrastructure needed for putrescible waster transfer stations in Greater Sydney as stated in the NSW Government in meeting the NSW Waste and Sustainable Materials Strategy (2021)
- Contribute to the State achieving resource recovery targets (80 per cent average recovery rate from all waste streams by 2030) under the NSW Waste and Sustainable Materials Strategy 2041 (DPIE, 2021a), including C&I and MSW waste through increasing quantities of waste diverted from landfill; and
- Manage potential impacts associated with the construction and operation of the Proposal in an environmentally and socially responsible manner.

2.1 Need for Proposal

The Proposal represents essential waste infrastructure to meet the demand for processing and recovery of the anticipated C&I and MSW waste volumes within Greater Sydney over the next two decades. Significant expansion of the recycling and reprocessing network is critical to meeting state and Commonwealth waste targets and responding to fundamental challenges to the recycling business model, particularly within the C&I and MSW markets.

Expected increase in C&I and MSW waste volumes

The *NSW Waste and Sustainable Materials Strategy 2041 Stage 1: 2021 -2027* (Waste Strategy) (DPIE, 2021a) has identified that volumes of residual waste from household and commercial sources across NSW are predicted to almost double in the next 20 years to 2041, and putrescible landfills within Greater Sydney will be at capacity in 15 years. NSW DPIE (2021c) has identified that highly urbanised areas generate most of the organics waste and subsequent demand for nearby processing infrastructure are restricted by high land value and community nuisance issues.

Waste generated since 2018-2019 has increased 2.86 per cent, with organic waste increasing the most compared to domestic waste and recyclables increased 1.96 per cent since 2018-2019 (NSW LGWRR Data Report, 2019-2020). Total organics from kerbside collection in NSW accounted for an increase of 4.4 per cent from 2018-19 total to 813,389 tonnes (WARR LGA 2019-2020). Organics collected at kerbside in the SMA was reported as 306,080 tonnes (garden organics and FOGO) in 2019-20. Highly urbanised areas account for the majority of organics waste and the biggest demand for new infrastructure. However, in these areas high land value and community proximity to odour-generating waste facilities reduce the prospects of developing major new facilities. Instead, transfer stations are likely to be needed to bulk and transport organics to suitable locations for processing, with sites close to end markets likely to be preferred to minimise multiple handling.

Three million tonnes of putrescible and non-putrescible C&I waste were generated in the Metropolitan Levy Area (MLA)¹ in 2017-18, according to the 2019 WARR Progress Report. Nearly 49 per cent was recycled (1.47 million tonnes), marginally below the comparable state-wide performance of 53 per cent for C&I and only 43 per cent for MSW and significantly short of the 70 per cent C&I waste recycling rate for the financial year 2022 recovery rates for both waste streams set in the new Waste Strategy (DPIE, 2021a).

Sydney Metro Area (SMA) households contributed to 51 per cent of total NSW household waste in 2019-2020 (NSW LGWRR Data Report, 2019-2020). Between 2019-2020, MSW that wasn't recycled or composted, accounted for 2,135,037 tonnes of residual waste to landfill and of that 1,055,090 was from the SMA (NSW LGWRR Data Report, 2019-2020). Throughout NSW, 21.6 per cent (2.2 kg/bin/wk) of the content of residual bins is dry recyclables that could be diverted to dry recycling bins. This proportion is similar to 2011 (22.1 per cent) and reported the same kg/bin/wk (RAWTEC, 2020 - Analysis of NSW Kerbside Red Lid Bin Audit Data Report Results of the 2011 – 2019 audits (RAWTEC, 2020)). Specifically, In the SMA, 20.6 per cent of residual waste is made up of potentially dry recyclables. It should be noted that the SMA had the highest kg/bin/week of waste compared to the rest of NSW at 11.7 kg/bin/week (RAWTEC, 2020).

Landfill pressure and government targets

The Waste Strategy has a large focus on diverting organic waste from landfill, which the Proposal would substantially aid. The strategy has set targets of an 80 per cent average recovery rate from all waste streams by 2030 and to halve the amount of organic waste sent to landfill by 2030, including net zero emissions from organics to landfill by 2030. The Waste Strategy also outlines the need for new facilities to process combined food organics and garden organics (FOGO) and new organics transfer stations to move material outside urban areas for processing and small-scale onsite solutions in high population areas and industry centres.

Additionally, there are approximately 853,600 tonnes of organic waste generated in the Greater Sydney region that are either directly landfilled or are processed via an alternative waste treatment (AWT) facility and subsequently landfilled (due to the revised mixed waste organics output (MWOO) regulations). A further 427,712 t/yr of source separated domestic FOGO, GO and FO is produced in Greater Sydney with 280,154 t/yr produced in the SMA, applying further pressure to the landfills within Sydney.

According to the EPA's most recent Waste and Resource Reporting Portal (WARRP) data, there are 327 active landfill facilities operating in NSW. Of these 327 facilities there are only two landfill sites serving Sydney that can take putrescible waste. This shortfall in recycling is putting pressure on Sydney's limited putrescible waste landfill capacity. Furthermore, carbon emissions from organic waste decomposing in landfill make up more than two per cent of total net annual carbon emissions in NSW. Increased diversion of organics from landfill is an important first step towards reducing carbon emissions from waste and aligning with government targets.

In 2014 the NSW EPA commissioned an audit of 2,000 loads and 300 garbage bags of C&I waste (totalling 3,950 tonnes) across 14 landfill and transfer stations. The results of the audit indicated that 51 per cent of C&I waste in the regulated area comprised degradable organic materials. A major barrier to improving the resource recovery rates for the C&I waste stream is the reliance of source separation at site, rather than processing post-collection. The high presence of putrescible wastes increases the regulatory and compliance burden and contamination risk, for facilities

¹ Comprising the Sydney metropolitan area, the Illawarra region, the Central Coast and the southern Hunter region

not licensed to process putrescible waste, while also reducing landfill capacity in an otherwise valuable resource.

Infrastructure needs to service government targets and fulfillment by the Proposal

The Proposal would assist in providing critical resource recovery infrastructure identified in *the NSW Waste and Sustainable Materials Strategy 2041* (DPIE, 2021) to assist in the achievement of a 50 per cent reduction in the diversion of organic waste material being sent to landfill and an overall 80 per cent average recovery rate from all waste streams by 2030.

The NSW Waste and Sustainable Materials Strategy: A guide to future infrastructure needs (2021) states that putrescible waste transfer stations are needed in highly urbanised areas. These areas account for the majority of putrescible waste and the highest need for infrastructure to support this waste stream. The 2030 needs outlined in the report mention the need for waste transfer stations to service the Greater Sydney area. The Proposal would directly support the NSW Government in meeting these infrastructure requirements and providing the infrastructure needs to ensure the government's 2030 and beyond targets are met.

2.2 Consistency with Strategic Planning

The Proposal is strongly aligned with a number of strategic government imperatives, providing support for:

- The *Greater Sydney Region Plan: A Metropolis of Three Cities* (Greater Sydney Commission (GSC, 2018)
- The *Eastern City District Plan* (GSC 2018b)
- The *NSW Waste and Sustainable Materials Strategy 2041* (DPIE, 2021a)
- *NSW Freight and Ports Plan 2018-2023* (TFNSW, 2018)
- *Future Transport 2056 Strategy* (TfNSW, 2020)
- *Net Zero Plan Stage 1: 2020–2030* (DPIE, 2020).

The *Greater Sydney Region Plan: A metropolis of three cities* (GSC, 2018) recognises the importance of land retained for urban services in order to support a Growing Sydney. Approximately 74 per cent of industrial and urban services land is located in the Central City and Western Districts. Industrial and urban services land in the Eastern City District (GSC, 2018b) is highly constrained due to the development of residential dwellings and large-scale retail, which are higher-return land uses, and result in a lack of opportunities for new supply of industrial land. There is a need for waste infrastructure to be located in proximity to waste sources to reduce the distance to transport waste and the resulting cost to customers. The metropolitan region experiences severe space constraints, significant competition for land and high community sensitivity. Therefore, existing fit for purpose facilities provide the most appropriate sites for waste infrastructure to be established.

The Proposal site is situated in close proximity to the WestConnex, a key regional transport link. With the expected growth in traffic that is driving, among other things, development of the *Future Transport 2056 Strategy* (TfNSW, 2020), implies the need to develop greater efficiency in waste transport. The Proposal would improve logistics efficiencies for handling of putrescible waste between inner Sydney locations prior to bulk transfer to existing established waste disposal and processing facilities. The location of the Proposal site and its access to the key regional transport infrastructure makes it a strategic resource recovery asset that would play a key role in achieving this vision.

Under the *NSW Waste and Sustainable Materials Strategy 2041* (DPIE, 2021a), the NSW Government has committed an 80 per cent average recovery rate from all waste streams by 2030 and halving the amount of organic waste sent to landfill by 2030. The Proposal would play a key role in assisting in achieving these targets as a major barrier to resource recovery for C&I and MSW waste streams lies in the reliance on source separation at site. The strategy identifies a significant shortfall in organics transfer infrastructure to organics transfer stations (up to 180,000 tpa) to move material outside urban areas for processing (DPIE, 2021c). The Proposal would assist in providing key infrastructure identified in the strategy as lacking and assist in achieving the goal of halving the amount of organic waste sent to landfill.

In 2020, the NSW Government released the *Net Zero Plan Stage 1: 2020–2030* (DPIE, 2020), which sets out how we will reduce our emissions by 35 per cent by 2030, reaching net zero emissions by 2050. As part of the plan, the NSW Government committed to setting a target of net zero emissions from organic waste to landfill by 2030. In 2019-2020, an estimated 2.5 million tonnes of organic waste (such as food organics, garden organics, timber and textiles) was sent to landfill. In providing a key piece of infrastructure required to process organic waste, the Proposal would assist in the realisation of decreasing the amount of waste sent to landfill and reducing carbon emissions.

The Proposal would also complement other waste facilities in Greater Sydney such as the Ecology Park at Eastern Creek, where further processing could be carried out of non-putrescible waste recovered. This would provide a closed-loop outcome for waste transported to the Proposal site, supporting Government targets, lowering associated costs with transport and waste sorting, and supporting a more sustainable future.

2.3 Alternatives and site suitability

Consideration was given to alternative approaches as part of the design development process for the Proposal. Each of these alternatives have been discarded as they would not adequately address the critical need for putrescible waste supporting infrastructure and operations at the Proposal site.

- **A ‘Do nothing’ scenario:** this scenario was rejected as it would not increase the resource recovery capacity of the existing operations. This would be inconsistent with the objectives and goals mandated in local, state, and national strategic planning frameworks.
- **Alternative site:** The Proposal site is situated in close proximity to key regional transport infrastructure and is of appropriate zoning for an industrial use. The Proposal site is therefore considered the optimal location for the Proposal, with the result that alternate sites have not been considered. An alternative to the Proposal would be developing a new Waste Transfer Station on a greenfield site, potentially on the fringe of the Sydney Growth Centres, which would result in greater impact for the natural environment. The location of the Proposal is better placed geographically to service central Sydney customers and would yield the benefit of being in an urban area in which most organic waste is produced.
- **Alternative site configuration and layout:** The use of an alternative arrangement using only the building already in place was discounted as it would not provide full receipt of waste within an enclosed shed and site layout would preclude the movement of heavy vehicles easily for transfer of waste materials. In addition, the potential capacity of the site could not be realised with the smaller building footprint.

Based on the above factors, the Proposal presented at the Alexandria site is considered the most suitable option.

3 PROPOSAL

This section provides a description of the Proposal. It is noted that the description provided below presents only an indicative and conceptual description of the Proposal to assist the Department and agencies in setting assessment requirements. The final design of the Proposal may be altered from this description.

3.1 Proposal description

The Applicant is seeking approval for a waste transfer station with a material handling limit of up to 180,000 tpa of mostly putrescible waste from C&I and MSW markets at the Proposal location. Any non-putrescible waste that inadvertently ends up at the Proposal site, would be sent to the Eastern Creek facility for further processing. The purpose of the transfer station is to consolidate the C&I and MSW waste prior to transfer to existing resource recovery and processing facilities for further resource recovery or disposal. The proposed indicative layout of the facility is shown in Appendix A, including both the upper level and lower level and a cross section of the facility.

The Proposal is located at 84 Burrows Road, Alexandria, where an existing warehouse facility is in place. The Proposal would comprise construction of an enclosed transfer station facility across the site. Existing infrastructure would be retained where possible, and would include:

- Access and egress driveways onto Burrows Road
- Landscaping
- Connection to utilities.

The Proposal would include the following features and facilities:

- An enclosed warehouse style transfer station building incorporating hardstand area, push walls, a split level design allowing loadout from the main tip floor directly into vehicles in a dedicated loadout area, a lower level for car parking, amenities and non-putrescible waste loadout and chutes for transfer of non-putrescible waste to the lower level
- Limited access through roller doors that allow vehicle movements into the transfer station while controlling the release of air and noise emissions from building
- Internal roads and weighbridges configured to maximise the queuing capacity in the site and therefore minimise / avoid queuing onto Burrows Rd
- An air emissions and odour management and treatment system incorporating negative pressure as well as ventilation and controlled discharge points
- A demarcated separated area for storage of non-conforming waste including unexpected finds and dangerous goods
- Supporting infrastructure, including an office, amenities, hardstand areas, car parks, entry and exit weighbridges and sealed roads; and
- Ancillary infrastructure, including perimeter security fencing and gates, water storage tanks and fire suppression system, signage and stormwater and leachate management.

3.2 Construction Activities

Existing industrial warehouse type buildings are present on site. These would be demolished to suit the preferred layout of the proposed Transfer Station.

Construction activities would include the following:

- Demolition of redundant existing structures except for utility installations on the Proposal site
- Excavation of lower floor and filling, compacting and re-grading of the Proposal site, where required
- Construction of hardstand area at the Proposal site, where required
- Construction of hardstand for split level upper floor
- Construction of waste processing shed
- Construction of entry and exit weighbridges
- Construction of office buildings, car park and security fencing (as required)
- Upgrade/installation of ancillary infrastructure including stormwater and fire management systems
- Limited removal and reinstatement/expansion of landscaping.

3.3 Operational Activities

Operational activities would include the delivery of waste via commercial vehicles up from local C&I as well as from MSW sources. Waste would be deposited onto the main tip floor on the upper level. Recoverable materials would be removed and sorted to be directed offsite for further resource recovery (anticipated up to 20 per cent dry recyclable recovery from Greater Sydney). Recoverable material would be loaded out from the main tip floor over the tip floor wall directly into vehicles on the loadout level. Any non-putrescible waste that inadvertently ends up at the Proposal site would be sorted and transferred via chutes to the lower level for baling and transport off site.

The majority of the material received at the Transfer Station is expected to comprise waste from commercial and household waste collection trucks, stationary compactor (packer) hooklift loads and side-loader collections (for example, 240 litre mobile garbage bin collections from commercial and household premises). It is not intended that small vehicles or residential customers will utilise the Transfer Station.

Non-recoverable residual waste would be prepared for bulk loading and compaction within the enclosed warehouse building prior to being transported off-site for disposal at an appropriately licensed facility. Facilities potentially receiving the residual waste could include Bingo's Ecology Park at Eastern Creek, for further processing, other processing facilities or external landfill disposal. These current facilities would complement the Proposal by providing a full suite of waste recovery systems, maximising the amount of recyclable material from C&I and MSW sources.

Waste will typically be stored on site for no longer than one day before being transported off-site in order to minimise odour emissions associated with the breakdown of organic materials over longer time periods. Emphasis has been placed on odour management at the site due to the risks to the surrounding community, these are detailed further below.

Key operational components of the Proposal include:

- Handling of up to 180,000 tonnes per annum of putrescible waste from C&I and MSW sources
- Storage of putrescible waste
- Operational hours to cover 24 hours per day, seven days a week to cater for commercial and industrial requirements
- Access to the Proposal site would be via Burrows Road through defined entry and exit points with one-way vehicle movements through the facility

- Onsite car parking
- Weighbridges located at a sufficient distance into the site to avoid queuing on to the public road.

Key operational components of the Proposal that have been incorporated to ensure potential odour impacts are appropriately managed include:

- An enclosed facility, with fugitive emissions minimised through the use of negative pressure and fast acting roller shutter doors
- A ventilation system to direct air to a controlled and monitored discharge point (vent stack)
- An efficient split level load-out system to ensure minimal residence time on-site
- Leachate management
- Ongoing environmental monitoring.

3.3.1 Equipment

The equipment to be utilised on site would include the following:

- Loaders and excavators
- Industrial street sweeper
- Forklifts
- Compactor units
- Bailers.

4 STATUTORY CONTEXT

The following section provides an overview of the key legislation and planning instruments applicable to the Proposal. A detailed assessment of all the relevant legislation will be undertaken as part of the EIS.

4.1 Commonwealth Legislation

An initial assessment of the Proposal against Matters of National Environmental Significance under the *Environment Protection and Biodiversity Conservation Act 1999*, suggests that the Proposal would not have a significant impact upon these matters and therefore referral to the Commonwealth Minister for the Environment is not considered warranted.

The *Airport Act 1996* does not directly apply to the Proposal site as the Proposal is located approximately 2.3 km to the northeast of the airport. However, the Proposal is located within the inner horizontal line (51 m AHD) of the Obstacle Limitation Surface as defined for the airport, where there is a slight risk of bird strikes by aeroplanes as birds may be attracted to the facility. The National Airports Safeguarding Framework principles and guidelines – Guideline C Managing the risk of Wildlife Strikes in the Vicinity of Airports sets out a framework for state and local government decision makers to manage any potential impacts of wildlife strikes at or near airports.

4.2 NSW Legislation

4.2.1 Environmental Planning and Assessment Act 1979

The EP&A Act and EP&A Regulation provide the regulatory framework for planning approval and environmental assessment in NSW. Part 4 of the EP&A Act provides for control of 'development' that requires development consent from the relevant consent authority. Division 4.7 of Part 4 provides for control of SSD where the Minister for Planning (or delegate) is the consent authority.

The Proposal would be 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) 2011*, which refers to:

(2) Development for the purpose of waste or resource transfer stations in metropolitan areas of the Sydney region that handle more than 100,000 tonnes per year of waste.

Accordingly, as the Proposal is expected to handle more than 100,000 tonnes of waste per year, an EIS would be required to support the SSD Application for the Proposal. This Report has been prepared to seek SEARs for the Proposal. These SEARs would allow the preparation of an EIS in line with the expectations of the regulators and in accordance with Part 4 of the EP&A Act.

4.2.2 Other Legislation

The EIS would provide a review of the Proposal against relevant legislation. Legislation that may be applicable to the Proposal includes, but may not be limited to is outlined in Table 4-1.

Table 4-1 NSW Legislation potentially applicable to the Proposal

Legislation	Applicability
<i>Protection of the Environment Operations Act 1977</i> (POEO Act):	The Proposal would be a Scheduled Activity as per Schedule 1 of the POEO Act and would consequently require an EPL under Section 34 and 42 of the POEO Act.
<i>Contaminated Land Management Act 1977</i> (CLM Act)	The CLM Act establishes a process for investigating and (where appropriate) remediating land that the Environment Protection Agency (EPA) considers to be contaminated significantly enough to require regulation. The Proposal site is not listed on the NSW Contaminated Land Register, although the adjoining Alexandra Canal is. No disturbance of this area is proposed but would be considered when reviewing potential impacts on the adjoining lot.
<i>Protection of the Environment Operations (Waste) Regulation 2014</i>	The Protection of the Environment Operations (Waste) Regulation 2014 POEO (Waste) Regulation requires tracking of certain waste within NSW and between participating states. Each party must be authorised to store, transport, or receive the specific type of waste.
<i>The Waste Avoidance and Resource Recovery Act 2001</i> (WARR Act)	The WARR Act aims to encourage the most efficient use of resources to reduce environmental harm and ensure that resource management is undertaken in a logical, sustainable and organised manner. The Proposal would promote resource recovery and diversion of waste to landfill and most importantly deliver on the principles of circular economy.
<i>Coastal Management Act 2016</i> (CM Act)	The CM Act aims to manage the coastal environment of New South Wales in a manner consistent with the principles of ecologically sustainable development for the social, cultural and economic well-being. The Proposal site is located within a 'Coastal Environment Area' and would therefore be assessed in accordance with the requirements of the Act.
<i>Roads Act 1993</i>	Transport for NSW (TfNSW) and Council of the City of Sydney would be consulted during the preparation of the EIS
<i>Biodiversity Conservation Act 2016</i> (BC Act)	<p>The purpose of the BC Act is to maintain a healthy, productive and resilient environment for the greatest well-being of the community, now and into the future, consistent with the principles of ecologically sustainable development (described in section 6 (2) of the Protection of the Environment Administration Act 1991). A description of additional biodiversity values are also provided in Section 1.4 of the <i>Biodiversity Conservation Regulation 2017</i> (BC Regulation).</p> <p>Section 1.5 of the BC Act provides a description of biodiversity values relevant to the Act that would normally require assessment within the relevant biodiversity assessment report. The Proposal would not significantly impact on biodiversity values. As such, a BDAR waiver (Appendix B) has been prepared for the Proposal</p>

Legislation	Applicability
	and should be considered exempt from satisfying Clause (2) of Section 7.9 of the BC Act.

4.3 State Environmental Planning Policies

The following State Environmental Planning Policies (SEPPs) may be applicable to the Proposal, and would be considered within preparation of the EIS if required (Table 4-2).

Table 4-2 NSW SEPPs potentially applicable to the Proposal

Legislation	Applicability
<i>State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55)</i>	SEPP 55 aims to promote the remediation of contaminated land with the objective of reducing the risk of harm to human health or other aspects of the environment. Clause 7 of SEPP 55 imposes an obligation on the approval authority to have regard to certain matters before granting approval.
<i>State Environmental Planning Policy No. 33 - Hazardous and Offensive Development (SEPP 33)</i>	SEPP 33 links the permissibility of an industrial development proposal to its safety and environmental performance. The Proposal falls within the definition of a “potentially hazardous industry” or “potentially offensive industry” under the SEPP 33. A preliminary hazard analysis would be undertaken by the proponent, the findings of which would be presented in the EIS.
<i>State Environmental Planning Policy (Infrastructure) 2007 (ISEPP)</i>	Section 121 of the ISEPP facilitates the development for the purposes of waste or resource management facilities to be undertaken, with development consent within a ‘prescribed zone’ being IN1 General Industrial. The subject site is zoned IN1 General Industrial under the <i>Sydney Local Environmental Plan 2012</i> . Therefore, development of waste or resource management facilities would be permissible on the Proposal site with development consent. In addition, the ISEPP identifies development that is considered to be Traffic Generating Development. As per Schedule 3 of the ISEPP, a recycling facility or transfer station of any size or capacity is considered to be a Traffic Generating Development. The EIS will assess traffic impacts in accordance with ISEPP.
<i>State Environmental Planning Policy (Coastal Management) 2018 (CM SEPP):</i>	The aim of the CM SEPP is to promote an integrated and co-ordinated approach to land use planning in the coastal zone in a manner consistent with the objects of the CM Act, including the management objectives for each coastal management area. Clause 13 of the CM SEPP imposes an obligation on the approval authority to have regard to certain matters before granting approval.
<i>State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55)</i>	SEPP 55 aims to promote the remediation of contaminated land with the objective of reducing the risk of harm to human health or other aspects of the environment. Clause 7 of SEPP 55 imposes an obligation on the approval authority to have regard to certain matters before granting approval.

4.4 Local Planning Instruments

The relevant local planning instrument is the Sydney LEP (2012). The Proposal site is zoned IN1 General Industrial under the Sydney LEP (refer Figure 4-1). The Proposal is permissible with consent under this planning instrument. The objectives of the zone align with the objectives of the Proposal in to encourage employment opportunities, support industrial land for industrial uses and to support the viability of nearby centres.

The Sydney Development Control Plan (2012) (DCP) supplements the Sydney LEP (2012) and provides further provisions to guide development in the local area. Section 5.8 of the DCP outlines further provisions for the Proposal.

Division 23 of the ISEPP (2007) permits the establishment and operation of a resource management facility with development consent as it is designated a General Industrial Zone as stated above in the Sydney LEP (2012).

Alexandria Waste Transfer station

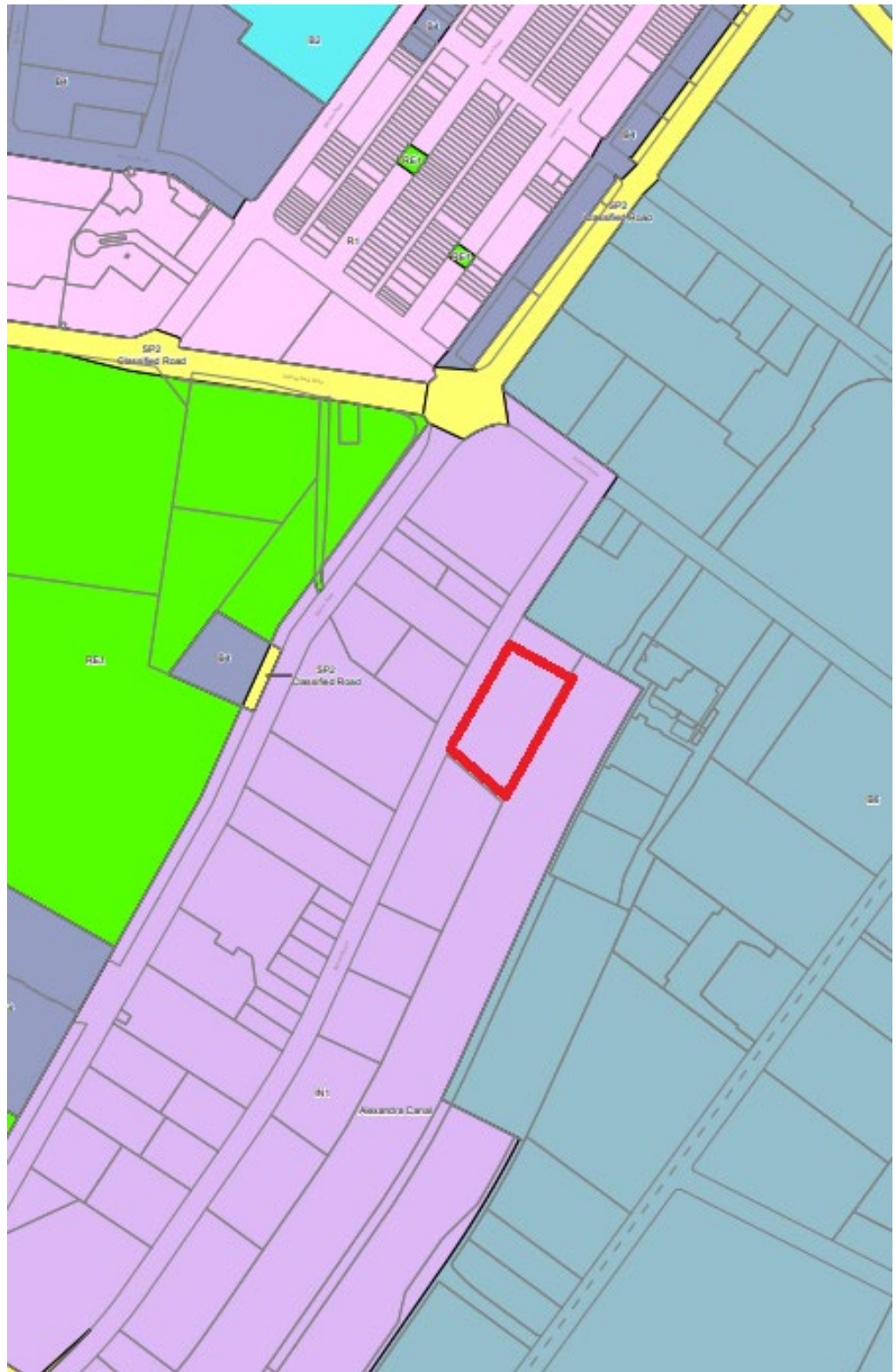


Figure 4-1: Zoning map Sydney LEP (2012) showing the Proposal site in red and IN1 – General Industrial in purple

5 PRELIMINARY ENVIRONMENTAL RISK ANALYSIS

An initial review of potential environmental issues for consideration has been undertaken to determine the level of assessment required to adequately identify and reduce the risk of each issue. The *Scoping an Environmental Impact Statement - Draft Environmental Impact Assessment Guidelines* (DPIE, 2017), provide guidance on key considerations for determining areas likely to have an impact, including:

- Extent (geographic) of the impact
- Duration of the impact
- Severity of the impact
- Sensitivity of the receiving environment
- Potential for cumulative impact.

A preliminary risk screening analysis has been carried out to determine key issues associated with the Proposal with potential to have an impact. The screening analysis has been determined based on the methodology described below.

5.1 Environmental risk screening methodology

The preliminary environmental risk screening identified and assessed the potential environmental impacts associated with the Proposal and assigned a risk ranking to each of the impacts identified. Each of the potential environmental impacts has been ranked between 'very low' and 'very high' based on the unmitigated environmental impacts that could potentially result.

Table 5-1 provides the risk categories used to guide the identification of an appropriate risk ranking.

Table 5-1: Risk analysis categories and criteria for risk rating

Likelihood	Consequence				
	1 – Not significant	2 – Minor	3 – Moderate	4 – Major	5 – Severe
A – Almost certain	Moderate	Moderate	High	Very High	Very High
B – Likely	Low	Moderate	High	Very High	Very High
C – Possible	Low	Low	Moderate	High	High
D – Improbable	Very low	Low	Low	Moderate	Moderate
E - Rare	Very low	Very low	Low	Low	Moderate

The allocation of risk is determined on the basis of consideration of both the likelihood of an impact occurring, and the consequences of the impact occurring. The criteria for evaluating likelihood and consequence of risk are identified in Table 5-2 and Table 5-3, respectively.

Table 5-2: Criteria for evaluating likelihood

Level	Descriptor	Description	Frequency of Occurrence
A	Almost Certain	Is expected to occur in most circumstances	Once per month
B	Likely	Will probably occur in most circumstances	Between once a month and once a year
C	Possible	Might occur at some time	Between once a year and once in five years
D	Improbable	Could occur at some time	Between once in five years and once in 20 years
E	Rare	May occur in exceptional circumstances	Once in more than 20 years

Table 5-3: Criteria for evaluating consequence

Level	Category	Environmental
1	Not Significant	Release to the environment immediately contained.
2	Minor	Release to environment contained with internal assistance.
3	Moderate	Release to the environment and contained with external assistance.
4	Major	Pollution event with short-term detrimental effect.
5	Severe	Pollution event with long-term detrimental effect.

The screening process aims to prioritise the environmental issues for assessment and does not take into consideration the application of any mitigation measures to manage the potential impacts. Appropriate mitigation measures and safeguards would be developed during the assessment process and detailed in the EIS to minimise the potential impacts the Proposal would have on the environment. The risk assessment has been used to identify which environmental issues pose the greatest risk and are proposed as key issues, and which issues pose a low risk and would not require assessment within the EIS.

5.2 Preliminary risk screening

The outcomes of the preliminary environmental screening process for the Proposal are presented in Table 5-4.

Table 5-4: Outcomes of environmental risk screening

Issue	Unmitigated Environmental Risk Screening			Environmental Assessment Significance
	Likelihood	Consequence	Risk	
Traffic, access and car parking				
Construction traffic and transport impacts	Likely	Minor	Moderate	Moderate
Operational traffic and transport impact on surrounding network	Likely	Moderate	Moderate	
Noise and vibration				
Construction noise and vibration impact on sensitive receivers	Possible	Minor	Moderate	Moderate
Operational noise and vibration impact on sensitive receivers	Possible	Minor	Moderate	
Air Quality				
Construction air quality impacts on sensitive receivers	Improbable	Moderate	Low	Moderate to High
Operational dust and vehicle emissions on sensitive receivers	Likely	Moderate	High	
Operational odour impact on sensitive receivers	Possible	Moderate	Moderate	
Water quality and hydrology				
Potential to encounter groundwater during construction	Rare	Minor	Very Low	Moderate

Issue	Unmitigated Environmental Risk Screening			Environmental Assessment Significance
	Likelihood	Consequence	Risk	
Potential for water contamination during construction	Possible	Major	Low	
Change in flooding regime resulting in increased flood impacts	Improbable	Moderate	Low	
Soils and contamination				
Potential to encounter contaminated soils during construction	Possible	Moderate	Moderate	
Erosion risk of exposed soils during construction	Possible	Moderate	Moderate	Moderate
Contamination of soils caused by spills and leaks	Possible	Minor	Low	
Hazards and risk				
Storage and handling of dangerous goods causing risk	Improbable	Moderate	Low	
Potential fire, bird strike or other hazard and risk	Likely	Major	Moderate	Moderate
Greenhouse Gas (GHG) Emissions				
GHG emissions from direct and indirect sources	Likely	Minor	Low	Low
Biodiversity				
Construction or operational impact to flora and fauna	Improbable	Minor	Very Low	Very low

Issue	Unmitigated Environmental Risk Screening			Environmental Assessment Significance
	Likelihood	Consequence	Risk	
Potential impact to threatened flora and fauna that the site may support	Rare	Minor	Very Low	
Waste management				
Construction waste generation	Likely	Not significant	Low	Low
Operational waste handling and generation	Likely	Not significant	Low	
Visual				
Construction (temporary) impact on visual landscape on sensitive receivers	Possible	Minor	Low	Low
Long-term impact on visual landscape on sensitive receivers	Improbable	Minor	Low	
Social and economic				
Amenity impacts during construction and operation	Improbable	Minor	Low	Low
Property and land use impacts	Rare	Not significant	Very low	
Creation of employment opportunities	Possible	Minor	Low	
Aboriginal and non-Aboriginal heritage				

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Issue	Unmitigated Environmental Risk Screening			Environmental Assessment Significance
	Likelihood	Consequence	Risk	
Construction or operational impacts to Aboriginal heritage	Rare	Minor	Very low	Very low
Construction or operational impacts to non-Aboriginal heritage	Rare	Minor	Very low	

6 KEY ENVIRONMENTAL ASSESSMENT ISSUES

6.1 Overview

A preliminary screening of environmental issues was undertaken to establish the requirement for further assessment. A summary of this screening is presented in Table 6-1 below. Issues requiring further assessment have been separated into 'key' and 'other' issues. Key issues have been further assessed below, while the 'other' issues have been presented in Section 6.7.

Table 6-1: Preliminary screen of environmental issues

Environmental Aspect	Preliminary Screening	Relevant Sections
Key issues		
Traffic and access	The Proposal has been identified as a Traffic Generating Development, as per Schedule 3 of the ISEPP. Truck movements may result in impacts on surrounding intersections and roads.	Section 6.2
Air Quality	Construction and operation including processing of waste, have the potential to generate odour, dust and vehicle emissions which may impact on sensitive receivers and the surrounding environment. Nearby sensitive receivers include childcare facilities and food manufacture facilities.	Section 6.3
Noise and Vibration	Noise from traffic and transfer operations could result in impacts to surrounding receivers.	Section 6.4
Water quality	Management of waste has the potential to impact upon stormwater runoff if not appropriately managed. In addition surface water management during construction and operation needs to be considered to manage potential for impact on the adjoining Alexandra Canal. The site is located within a declared Coast Environment Area under <i>Coastal Management Act 2016</i> . Development consent would need to consider whether the development will have an adverse impact on the integrity, values or heritage of the coastal environment area.	Section 6.5
Soil and contamination	The area is mapped as a Class 3 Acid Sulfate Soils where disturbance >1m below natural ground surface requires consent.	Section 6.6

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Environmental Aspect	Preliminary Screening	Relevant Sections
	The adjacent Alexandria Canal is listed on the Contaminated Land Register (CLR). The Proposal site is not listed on the CLR.	
Heritage	A search of relevant publicly available databases identified the adjacent Alexandria Canal on the State Heritage Register. No items or areas of Aboriginal heritage were identified within or in close proximity to the Proposal site.	Section 6.7
Other issues		
Hazards and Risk	Storage and handling of hazardous and dangerous goods on site may result in impacts to the surrounding environment, including fire risk. Waste at the site may attract wildlife, such as birds, posing a risk to bird plane strikes.	Section 7.1
Waste Management	Construction of the proposal site would result in the generation of construction waste. During operation, the Proposal would handle and generate waste which may result in environmental impacts if not appropriately managed.	Section 7.2
Biodiversity	The Proposal is located within an industrial area with limited ecological values and is unlikely to have a significant impact on biodiversity.	Section 7.37.3
Landscape and visual	Changes in the visual landscape from construction and operation of the Proposal may result in minor visual impacts to views and changes to the Burrows Road streetscape.	Section 7.4
Socio-economic	The business operation would operate in a similar manner to the neighbouring waste facility and would result in socio-economic benefits to the local economy by employing local labour.	Section 7.5

Potential environmental impacts associated with the Proposal will be considered as part of the EIS and if required, managed through the implementation of appropriate mitigation and control measures.

6.2 Traffic and access

6.2.1 Overview

The Proposal has been identified as a Traffic Generating Development, as per Schedule 3 of the *State Environmental Planning Policy (Infrastructure) 2007* (ISEPP). It is noted that recycling facilities and waste transfer stations of any size or capacity are classified as a Traffic Generating Development.

Access to the Proposal site would be via an entrance at Burrows Road. Vehicles would then move through the Proposal site in a single direction via a weighbridge to the closed transfer building to deposit waste materials prior to exit via the exit point onto Burrows Road. Access to Burrows Road is via Campbell Road from the south or Huntley Street from the north.

Existing internal carparks would be retained within the Proposal site to accommodate workforce and site visitors.

6.2.2 Summary of Issues

Construction

Construction of the Proposal would require the use of heavy vehicles to deliver construction plant, equipment and materials as well as remove excess materials and waste from the Proposal site. The construction period would be minimal and would also result in increased use of light vehicles on the surrounding road network associated with the construction workforce. These impacts would be expected to be short lived as construction is expected to be completed within six months, not accounting for any unforeseen delays.

Operation

The Proposal may result in increased truck movements associated with the delivery of waste materials to the Proposal site for consolidation. Light vehicle movements would be limited to the transfer station workforce, as the Proposal would be limited to accepting C&I and MSW wastes.

The Proposal would accept waste 24 hours per day, 7 days per week.

Increased heavy vehicle movements on Burrows Road and the surrounding road network are anticipated based on the Proposal compared with existing vehicle movements. However, the expected increase in heavy vehicles due to the Proposal is not expected to significantly impact the local road network performance.

6.2.3 Proposed Further Assessment

The EIS would be accompanied by a comprehensive Traffic Impact Assessment that would determine the impacts associated with the Proposal for both construction and operational phases. It would also provide consideration of the following aspects:

- The current and future capability of local and regional road infrastructure
- The type and frequency of heavy vehicles proposed to utilise the site
- The suitability of the Proposed site layout to accommodate the predicted heavy vehicle movements from the site
- Details of the internal road layout network and parking in accordance with Australian Standards.

The EIS would include recommendations to mitigate the likely impacts of the development on the road network including manoeuvring arrangements, operational management plans and the suitability of the existing road network to accommodate the Proposal. Appropriate consultation with NSW Transport (TfNSW) would be undertaken to satisfy the requirements of SEPP (Infrastructure) 2007.

6.3 Air Quality

6.3.1 Overview

Likely air emissions arising from the Proposal include odour from the handling of putrescible waste, dust from demolition and construction activities and vehicle emissions for heavy and light vehicles accessing the site. The containment and control of odour emissions associated with the putrescible waste handling at the Proposal site is a key issue for consideration for environmental and planning assessment. The potential exists for odour and dust to generate nuisance impacts and complaints from the nearby community, including the nearby childcare centre. Best practice implementation, including well-considered design elements such as a fully engineered negative pressure enclosed handling facility and a well-maintained ventilation and filtration system to capture and neutralise odours prior to release would all be factored into the final design of the Proposal.

Sensitive receptors for air quality values have been identified in Section 1.3. The area is dominated by industrial land use in the immediate vicinity, intertwined with commercial premises such as childcare, food manufacturing and hospitality services. In addition, residential dwellings are located approximately 250 m from the Proposal site.

6.3.2 Summary of Issues

6.3.2.1 Construction

Construction of the Proposal has the potential to generate short term air emissions during demolition of the existing buildings and construction of the new facilities including:

- Dust and particulate matter
- Wheel generated dust from exposed earthworks and materials laydown
- Vehicle, plant and equipment emissions.

6.3.2.2 Operation

The generation of odour may be a key potential source of impact to nearby receptors associated with the Proposal if not appropriately managed. Operational impacts to be considered as part of ongoing assessments and investigations include, but are not limited to:

- Material handling activities including unloading and loading and holding of waste
- Odour emissions from waste handling and temporary storage prior to haulage off site
- Odour emissions from ventilation system discharge points.

Development of a robust design that works to effectively neutralise odour and air quality impacts would be a key feature of the Proposal.

6.3.3 Proposed Further Assessment

An air quality investigation will be conducted as part of the EIS to evaluate the impact of emissions of key pollutants to inform mitigation and management measures for the design and operation of the Proposal. The assessment will:

- Adhere with the requirements of the *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* (NSW EPA, 2016)
- Generate a site-representative meteorological dataset. Observational data from the nearest Bureau of Meteorology would be assimilated into the model as required by the NSW EPA.
- Predict air quality impacts from the operation of the facility including odour emissions dispersion to predict ground level concentrations at the nearest receptors. In addition, cumulative particulate matter impacts would be assessed.
- Identify feasible and reasonable management measures (particularly odour management and control measures) to be implemented as core design elements of the facility including:
 - High speed roller doors to maintain a closed warehouse facility operating under negative pressure to minimise fugitive odour emissions
 - Well maintained ventilation and controlled discharge system
 - Monitoring of air emissions from discharge points aligned with community nuisance monitoring
 - Managed transport routes to control nuisance complaints from transfer in and out of the Proposal location.
 - Maintaining a clean hardstand area within the operational zones of the Proposal site
 - Regular maintenance of all on site diesel powered plant in accordance with manufacturer's specifications.

6.4 Noise and vibration

6.4.1 Overview

The location of the Proposal is zoned IN1 General Industrial, and the general character of this area is predominantly industrial and commercial/manufacturing facilities.

The nearest sensitive receptor is a childcare centre located immediately across the road from the Proposal site (<100 m). Another childcare centre is located across Alexandra Canal on Huntley Street, approximately 200 m from the Proposal site.

Recreation facilities are located approximately 300 m west of the Proposal, while residential dwellings are located approximately 250 m northwest of the site.

6.4.2 Summary of Issues

6.4.2.1 Construction

Noise impacts during construction may arise as a result of demolition and construction activities, however would be short-lived in nature. The construction of the Proposal may include:

- Impact on noise sensitive receptors as a result of demolition works including crushing and loading of waste vehicles for transfer offsite, vehicle and plant and equipment noise
- Construction noise generation from activities including delivery of goods and materials, vehicle movement and plant and equipment alarms and running “white noise”
- Vibration impacts associated with demolition works and foundation works required to support the Proposal.

6.4.2.2 Operation

During operations the Proposal may generate noise impacts from:

- Vehicle noise including exit and entry from the location, unloading and loading activities, including waste containers
- Plant and machinery from on-site activities including reversing alarms and ongoing engine noise
- Ventilation fans and discharge point systems and compressors along with entry point systems for the warehouse building.

6.4.3 Proposed Further Assessment

A noise and vibration assessment will be undertaken as part of the EIS to determine the potential impacts of the Proposal, both during construction and operations. The assessment will:

- Establish existing ambient and background noise levels at the likely most affected off-site receiver locations.
- Identify nearby sensitive receptors, land use and terrain
- Identify sound power levels for each piece of equipment or process
- Assess operational and construction noise impacts in accordance with the Noise Policy for Industry (NSW EPA, 2017) and the Interim Construction Noise Guideline (NSW EPA 2009) respectively.
- Assess traffic noise consistent with EPA’s Road Noise Policy.
- Identify feasible and reasonable noise mitigation measures to address noise exceedances at sensitive receivers where modelling indicates exceedances may occur.

6.5 Water quality and hydrology

6.5.1 Overview

The Proposal is located adjacent to the Alexandria Canal (within the Shea’s Creek catchment), a State Heritage Register listed place that flows to the Cooks River to Botany Bay. A Foreshore Building Line limits development within 10 m of the bank of the canal. The existing building on site is within this 10 m exclusion zone. The final design of the Proposal will take this into consideration. Numerous drains and stormwater pipes discharge to the Alexandria Canal from the surrounding industrial areas, as such the quality of water has been impacted by contaminated runoff.

Surface water from within the Proposal site would be captured and treated prior to discharge. Gross pollutant and coarse sediment control measures would be installed

if required to manage stormwater releases from the construction and operation activities and minimise impact on the stormwater system.

Wastewater generated from staff facilities would be connected to the existing sewer system servicing the industrial area, while water would be supplied via the existing water service connections.

A remediation order under the *Contaminated Land Management Act 1997* exists for the sediments of the Alexandra Canal, adjacent to the Proposal site. No disturbance of this area is proposed, but would be considered in operation and construction activities to reduce potential for increased sediment load and contamination from erosion, spills or leaks.

The Proposal is also located within a Coast Environment Area under the *Coastal Management Act 2016*. Development of the Proposal is not likely to impact the coastal environment as it is consistent with the existing industrial land use. The Proposal site is located within an area identified as subject to minor inundation during a flood event (0.1-0.3 m during a 1-in-100 year flood event).

The short-term handling of waste and the waste containment systems proposed, along with the capture and treatment of stormwater prior to release, do not pose a significant impact to water resources.

6.5.2 Summary of Issues

6.5.2.1 Construction

The Proposal may have a potential to generate the following impacts:

- Erosion and sedimentation transport through exposed soils and stockpiled materials
- Water contamination resulting from an increase in sediment loads entering the stormwater system and entering nearby receiving waterways, being Alexandra Canal during earthworks at the Proposal site.

6.5.2.2 Operation

Once the Proposal is operational, the potential exists for the following impacts:

- Putrescible C&I and MSW waste leachate leaks which, if not appropriately contained during the transfer process, have the potential to contaminate the surrounding surface water systems including stormwater and the Alexandra Canal. The hardstand flooring proposed would present minimal potential for impact on soils and groundwater.
- Spills and leaks from operating machinery resulting in contamination of soil, groundwater and surface water.
- Changes to flood regimes (flood storage and flow) as well as potential impacts to the facility arising during a flood event.

6.5.3 Proposed Further Assessment

Further assessment of soil and water as part of the EIS for the Proposal is proposed to include the following:

- Assessment of potential impacts of the Proposal on soil and water resources
- Preparation of a site water balance to support sustainable water use at the Proposal site

- Preparation of a flood and surface water assessment to determine the potential for the Proposal to alter hydrological patterns or be impacted by a flooding event
- Details of stormwater/wastewater/leachate management systems, including capacity of onsite detention systems and measures to treat, reuse or dispose of stormwater
- Provide recommendations for erosion and sediment control measures during construction and operation of the Proposal. Recommendations will be consistent with the Managing Urban Stormwater: Soils and Construction volume 1 and volume 2 series published by the former NSW Department of Environment and Climate Change (DECC) in 2008.

6.6 Land

6.6.1 Overview

The Proposal site is located within an area mapped as Class 3 Acid Sulfate Soils under the *Sydney Local Environmental Plan 2012*. In accordance with the Sydney LEP, development consent is required for work one metre below natural ground surface.

The Proposal site is not listed on the NSW Contaminated Land Register, although industrial zoning and previous use cannot discount potential for contamination and should be considered during excavation.

As noted in Section 6.5.1, above the adjoining Alexandria Canal is a listed site on the Contaminated Land Register. No disturbance of this area is proposed but will be considered when reviewing potential impacts on the adjoining lot.

6.6.2 Summary of Issues

6.6.2.1 Construction

Excavation of the ground surface to accommodate the Proposal may expose:

- Potential acid sulfate soils contributing to acid drainage to the adjacent Alexandria Canal or existing surface water systems
- Contaminated land from previously undisclosed activities
- Erosion risk from exposed surfaces where control measures are not adequate.

6.6.2.2 Operation

Operational activities have the potential to contaminate land through:

- Spills and leaks from plant and machinery
- Leachate from putrescible waste leaking to land or clean surface water systems

In addition, the exposure of acid sulfate soils to building infrastructure could present long term risks to structural stability.

6.6.3 Proposed Further Assessment

An assessment of land resources including potential for acid sulfate soil or contaminated land disturbance will be conducted. Erosion potential during construction would be considered in the soils assessment for the Proposal site.

An Acid Sulfate Soils Management Plan will be prepared in accordance with Acid Sulfate Soils Manual to support the EIS.

6.7 Heritage

6.7.1 Overview

A search of the NSW State Heritage Inventory (NSW Heritage, 2021a) did not identify any Aboriginal Places within the vicinity of the Proposal. A search of the NSW Aboriginal Heritage Information Management System (NSW, 2021b) found no Aboriginal places within 200 m of the Proposal location. The potential for impact on Aboriginal places as a result of the Proposal is very low.

A search of the NSW Heritage Inventory identified one non-indigenous state heritage place, being Alexandra Canal and three local heritage places under the Local Environmental Plan, being the Water Board Pump House, Former Q Store and Shea's Creek Woolsheds (NSW Heritage, 2021).

Within a five km radius locations including Centennial Park (3.5 km from Proposal site) and the Hyde Park Barracks (4.5 km from Proposal site) are identified heritage places under the EPBC Protected Matters Search Tool (DAWE, 2021). The potential for impact on these facilities is very low due to the distance from the Proposal site.

6.7.2 Summary of Issues

6.7.2.1 Construction

Construction would have limited potential to result in impacts to heritage items, Damage to the adjacent listed Alexandra Canal will be controlled through maintenance of the 10 m buffer Foreshore Building Line, limiting disturbance.

No Aboriginal sites are located in the immediate vicinity of the Proposal, as such impacts from construction are likely to be very low.

6.7.2.2 Operations

Heritage impacts during operations are unlikely. Access to the adjacent Alexandra Canal is not required for operation of the Proposal. The Proposal will be located outside of the Foreshore Building Line, maintaining a 10 m buffer to the bank of the Alexandra Canal.

6.7.3 Proposed Further Assessment

As the site is located within close proximity to listed state heritage places, a desktop assessment of heritage impacts is proposed to further understand and recognise the potential impact of the works on the adjoining land and identified heritage places in the closer vicinity of the Proposal. Given the disturbed nature of the Proposal site and the very low likelihood of items being present, an Aboriginal Cultural Heritage Assessment Report (ACHAR) is not considered necessary.

Management measures will be developed based on the further assessment and presented within the EIS to protect the adjacent heritage place.

7 OTHER ENVIRONMENTAL ISSUES

As noted in Section 6, the high-level environmental scoping assessment identified a number of key environmental issues that required detailed assessment and a number of 'other issues' where the level of further assessment could be limited to additional desktop assessment. These low-risk issues are identified below.

7.1 Hazards and Risks

7.1.1 Overview

The Proposal would require the storage and handling of small quantities of hazardous and dangerous goods to support operation of plant and machinery. A preliminary screening under the requirements of *State Environmental Planning Policy No 33 – Hazardous and Offensive Development* (SEPP 33) will be conducted as part of the EIS, although it is unlikely these quantities would trigger a preliminary hazard analysis under SEPP33.

The operation of the Proposal has the potential to trigger SEPP33 as a “potentially offensive development” associated with air and noise emissions from waste handling within, and transport to and from, the Proposal site. Assessment as part of the EIS would determine the likelihood for trigger of SEPP33 in this instance.

7.1.2 Summary of Issues

7.1.2.1 Construction

Hazards associated with construction of the Proposal will be managed as part of a Construction Environmental Management Plan (CEMP), which would be prepared prior to construction commencing. Work health and safety (WHS) risks will be identified with the CEMP and managed in accordance with the WHS Act 2011.

7.1.2.2 Operation

The operation of the Proposal would include waste storage which could pose a fire risk to the Proposal. The nature of operations of the Proposal means that it would have an inherent fire risk which would be managed through design that meets the FRNSW Fire Safety in Waste Facilities Guideline, best management practices and through the development and implementation of emergency response plans.

Putrescible waste at the site may attract wildlife such as birds. Being in proximity to Sydney Airport (approx. 2.3 km away), there is an inherent risk of bird strikes from planes, although considered very minimal. Operation of the Proposal would be undertaken wholly within a purpose-built warehouse, which is fully enclosed (besides automatic roller doors) therefore limiting egress from wildlife, including birds.

Hazards associated with operation of the Proposal will be managed as part of an Operational Environmental Management Plan (OEMP), which would be prepared prior to operation commencing.

Small quantities of hazardous or dangerous goods may also be stored onsite during operation

7.1.3 Proposed Further Assessment

The EIS will confirm the types, quantities, storage locations and storage conditions of any dangerous goods proposed to be stored on site. The EIS will also confirm the proposed frequency of transport movements relating to dangerous goods. Where any exceedances to thresholds are identified, the EIS will be supported by a screening analysis against SEPP33 to determine the cumulative risks associated with the Proposal. It is unlikely that a Preliminary Hazard Analysis will be required due to the small quantities of material to be held on site.

Hazards and risks associated with the construction and operation of the Proposal will be identified as part of the EIS and mitigation measures to reduce risk, including fire and bird strikes by planes, will be identified.

7.2 Waste Management

7.2.1 Overview

Wastes generated at the site would be stored appropriately prior to disposal off site at a licenced disposal or recycling facility.

7.2.2 Summary of Issues

7.2.2.1 Construction

During the construction phase, the potential waste streams that could be generated by the construction process include:

- Excess landscaping materials
- Excess drainage and piping materials
- Asphalt and bitumen waste
- Excess road construction materials (road base, stone etc)
- Concrete
- Formwork – use and offcuts
- Steel and steel reinforcement offcuts
- Fixings
- Timber
- Adhesive/resins/paints/fixings
- Batteries
- Miscellaneous construction chemicals
- Tool and equipment consumables
- Fuels/oils/grease
- Packaging – cardboard, plastic and drums
- Putrescible waste from lunchrooms
- Plant and equipment maintenance waste (e.g. oily rags, oil filters, tyres etc).

These waste streams would be managed appropriately to ensure minimisation of waste generation and avoid, where possible, transportation to landfill.

7.2.2.2 Operation

Excluding the operational aspect of movement of waste through the transfer station, the volumes of waste likely to be generated from operational activities is limited to that generated by the workforce such as crib rooms and office facilities, combined with minor volumes from plant and equipment needs and environmental incident clean up. This would be stored and handled appropriately prior to disposal/recycling at licenced facilities.

7.2.3 Proposed Further Assessment

The EIS will document how such waste streams are to be managed on site and in the context of regulatory obligations under the POEO Act, 1997 and the *Waste Avoidance and Resource Recovery Act, 2001*.

The assessment EIS will:

- Identify waste streams generated during the construction stage of the Proposal
- Assess waste management impacts associated with construction activities
- Identify waste acceptance, handling and storage processes and volumes for operational activities
- Identify transport and equipment maintenance and management including wastewater generation from washdown
- Identify incident and emergency response measures to manage environmental impacts

7.3 Biodiversity

7.3.1 Overview

The majority of the Proposal site is comprised of hardstand and man-made structures (approx. 90 per cent), including one large warehouse and office with limited vegetation/landscaping remaining onsite.

A search of the NSW government SEED² was conducted on 9 July 2021. Desktop searches did not indicate Threatened Ecological Communities (TEC's) or Endangered Ecological Communities (EEC's) within the Proposal site.

The Proposal site does not contain any mapped biodiversity values, including no high biodiversity values mapped under the *Biodiversity Conservation Act 2016*, on the Biodiversity Values Map (BV Map) and no mapped Plant Community Types (PCTs), as maintained under the BioMetric Vegetation Types database.

The Proposal site is not considered to provide significant habitat for any threatened ecological communities or threatened species.

7.3.2 Summary of Issues

As the Proposal site is already highly modified and provides limited habitat for threatened species or ecological communities, significant impact on biodiversity is not likely. Limited vegetation on site may provide foraging habitat for *Pteropus poliocephalus* (Grey-headed Flying-fox), but this is unlikely as there is more suitable habitat within the wider locality. In addition, the presence of man-made structures may

² <https://live.seed.nsw.gov.au/about-seed>

present an opportunity for micro-bats to utilise the area. This would be considered as part of desktop assessment.

7.3.3 Proposed Further Assessment

No further assessment is proposed.

A Biodiversity Development Assessment Report Waiver (B) has been prepared for consideration as part of this proposal, given the lack of biodiversity values present on the site.

7.4 Landscape and Visual Amenity

7.4.1 Overview

The Proposal includes the demolition/alteration of existing buildings and structures and the construction of an enclosed processing shed, a site office and associated facilities, new weighbridges and associated infrastructure. The Proposal site is located within a broader industrial precinct that is typified by a mix of industrial developments including warehouse and commercial office buildings. Landscape tree planting is present along the street front of the Proposal site. This would remain untouched as a result of the Proposal. In addition, a stand of trees is located between the existing building and Alexandra Canal. These are located within the Foreshore Building Line, so are likely to be retained.

7.4.2 Summary of Issues

7.4.2.1 Construction

The construction of the Proposal may result in minor visual impacts associated with construction activities (sites/compounds, machinery, temporary structures etc.) on the visual amenity of adjacent properties and to users of Burrows Road.

7.4.2.2 Operation

The Proposal would generally be consistent with the visual built form of the existing site and is considered to be consistent with the established built form and visual character of the broader area and is not anticipated to result in substantial visual impacts to the surrounding receivers.

7.4.3 Proposed Further Assessment

Further desktop assessment of the potential for visual and landscape character impacts will be undertaken within an EIS and will include identification of the visual qualities present, including the existing landscape character of the region, sensitive locations, catchments and key viewpoints.

The identification of feasible and reasonable measures to mitigate impacts will be incorporated in the Proposal design.

Landscaping along the street front of Burrows Road will provide a buffer to the Proposal and additional suitable landscape treatment will be installed.

7.5 Socio-economic

7.5.1 Overview

The Proposal provides C&I and MSW putrescible waste to be consolidated prior to large volume transfer to an offsite facility for further sorting and processing. It promotes reduced travel distances and trips of smaller waste collection vehicles to a central location, prior to offsite transport, providing improved efficiencies of waste operations.

The Proposal would support employment of a workforce across the 24 hour a day, 7 day per week operations.

The area in the immediate vicinity of the Proposal site is zoned industrial, where waste facilities are deemed appropriate for development consent. Across from Alexandria Canal, land is zoned B6 Enterprise Corridor to support mixed compatible uses including business, office, retail and light industrial and to link with adjoining industrial areas.

7.5.2 Summary of Issues

Potential impacts on socio-economic wellbeing may occur due to noise and air emissions and traffic impacts.

The Proposal has the potential to provide positive impact through the generation of employment opportunities and provision of resource recovery and waste management infrastructure. In addition, transport and traffic improvements are likely in the wider area as a result of bulk waste transport movements instead of numerous small waste vehicle movements out of the local area to dedicated processing facilities.

7.5.3 Proposed Further Assessment

A limited desktop socio-economic assessment will be undertaken to identify and analyse the impacts of increase heavy vehicle movements on the surrounding community and businesses, along with an increase in workforce within the area from the 24 hour operations. In addition, the impacts of odour and noise from operations on surrounding sensitive receptors including childcare centres will be considered.

8 ENGAGEMENT

Bingo is committed to consulting with the local community and other stakeholders, including government agencies, regarding this proposed development. This will ensure that interested parties have the opportunity to understand the nature of the proposed development and can provide informed feedback.

During the preparation of the EIS the proponent will consult with the following:

- Council of the City of Sydney
- Environment Protection Authority
- Department of Planning, Industry and Environment
- Sydney Water
- Transport for NSW
- Fire and Rescue NSW
- Nearby land owners and occupiers that may be affected by the Proposal.

The EIS will describe the consultation process and the issues raised and identify where the design of the development has been amended in response to these issues. Where amendments have not been made to address an issue, adequate explanation will be required in the EIS.

9 CONCLUSION

Bingo are seeking consent to establish a putrescible C&I and MSW waste transfer station at 84 Burrows Road Alexandria. A purpose-built warehouse type facility is proposed to cater for acceptance of up to 180,000 tpa of waste from C&I and MSW waste sources, prior to bulk transfer off-site to existing regional waste disposal and processing facilities. The Proposal includes:

- Demolition of existing structures
- Construction of a new purpose-built facility including:
 - Enclosed warehouse building
 - Weighbridges
 - Vehicle washdown
 - Offices
 - Ventilation and air emissions systems
 - Car parking
 - Stormwater and fire water management systems.
- Operation of a waste transfer station accepting up to 180,000 tpa of putrescible waste from C&I and MSW sources.

The Proposal would be 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) 2011* and therefore requires the preparation of an EIS and consent from the relevant consent authority.

The potential environmental impacts have been identified and assessed as part of this application scoping report. The assessment concluded that minimal environmental impacts have been identified as a result of the Proposal. The key environmental issues identified for the Proposal include:

- Traffic, access and car parking
- Air quality
- Stormwater runoff, contamination and flooding
- Noise and vibration
- Land
- Heritage.

Other matters identified to have minimal impact and will be considered to a lesser extent include hazards and risk, waste management, biodiversity, visual amenity and socio-economic impacts.

The EIS will include the following in accordance with Schedule 1 of the EP&A Regulations:

- A detailed description of the Proposal including its components, construction activities and potential staging
- A comprehensive assessment of the potential impacts on the key issues including a description of the existing environment, assessment of potential direct and indirect and construction, operation and staging impacts
- Description of measures to be implemented to avoid, minimise, manage, mitigate, offset and/or monitor the potential impacts
- Identify and address issues raised by stakeholders.

10 REFERENCES

- Department of Planning, Industry and Environment (DPIE), 2017, *Scoping an Environmental Impact Statement - Draft Environmental Impact Assessment Guidelines*, State of New South Wales
- Department of Planning, Industry and Environment (DPIE), 2020, *Net Zero Plan Stage 1: 2020–2030*, New South Wales
- Department of Planning, Industry and Environment (DPIE), 2021a *State Significant Development Guidelines – Preparing a Scoping Report*, State of New South Wales
- NSW Department of Primary Industries and Environment, 2021b, *NSW Waste and Sustainable Materials Strategy 2041*
- Department of Planning, Industry and Environment (DPIE), (2021c) *NSW waste and Sustainable Materials Strategy: A guide to infrastructure needs*
- Greater Sydney Commission (GSC), 2018a, *The Greater Sydney Region Plan: A Metropolis of Three Cities*. State of New South Wales
- Greater Sydney Commission (GSC) 2018b, *The Eastern City District Plan – connecting communities*. State of New South Wales
- NSW Environment Protection Agency (EPA), 2009 *Interim Construction Noise Guideline*
- NSW Local Government Waste and Resource Recovery Data Report 2019–20 (NSW EPA 2021)
- NSW Environment Protection Agency (EPA), 2016, *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW*
- NSW Environment Protection Agency (EPA), 2017 *Noise Policy for Industry*
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- NSW Heritage, 2021, State Heritage Inventory, <https://www.hms.heritage.nsw.gov.au>, accessed 07 July 2021
- Office of Environment and Heritage (OEH) (2019) *Biodiversity Value Map and Threshold Tool*. Accessed on 9 July 2021 from:
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APPENDIX A – PROPOSED DESIGN INCLUDING CROSS SECTION

**APPENDIX B - BIODIVERSITY ASSESSMENT
REPORT WAIVER**

Alexandria Waste Transfer Facility: Biodiversity Development Assessment Report Waiver Application

Summary

Bingo Industries (the Applicant) are proposing to develop a putrescible waste transfer facility at 84-88 Burrows Road Alexandria, NSW (the Proposal site). The Proposal site is shown in the locality and area context figures.

This memo has been prepared to provide an assessment of impacts to biodiversity values associated with the Proposal and to support a Biodiversity Development Assessment Report (BDAR) waiver application.

The Applicant is seeking approval to develop a new purpose-built facility to improve logistic efficiencies for the handling of putrescible waste between inner Sydney locations prior to bulk transfer to existing regional waste disposal and processing facilities.

The Proposal is considered State Significant Development (SSD) under Schedule 1, Clause 23 (Waste and Resource Management Facilities) of the *State Environmental Planning Policy (State and Regional Development) 2011* (State and Regional SEPP). Schedule 1 of the State and Regional SEPP describes development which is considered to be SSD and this includes any waste and resource management facility handling greater than 100,000 tonnes per year. Accordingly, Part 4, Division 4.7 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) requires that an Environmental Impact Statement (EIS) be prepared to assess the potential impacts of the Proposal on the environment.

The Secretary (or delegate) of the Department of Planning, Industry and Environment (the Department) has the power to waive the requirement for a BDAR when proponents of SSI and SSD can clearly demonstrate that the proposed development is not likely to have a significant impact on biodiversity values. This memo seeks to provide information to assist the Planning/Environment Agency Head in making this determination.

As outlined in this memo, the Proposal site does not contain any mapped biodiversity values, including no high biodiversity values mapped under the BC Regulation, on the Biodiversity Values Map (BV Map) and no mapped Plant Community Types (PCTs), as maintained under the BioNet Vegetation Classification database. The Proposal site is located within an established industrial hardstand area and only minimal (approximately 5 trees) vegetation clearing or trimming would be required for the construction of the Proposal. This memo has been prepared using information from a desktop assessment.

This memo has been prepared to demonstrate that the Proposal would not significantly impact on biodiversity values. As such, a BDAR would not be required and the Proposal should be considered exempt from satisfying Clause (2) of Section 7.9 of the BC Act.

Table 1 below provides a summary of the Proposal as defined in the DPIE's BDAR waiver fact sheet.

Table 1: Introduction and background to Proposal

BDAR waiver request information requirements	
Administration	<p>Proponent name: Bingo Industries</p> <p>Contact: Brad Searle (Brad.Searle@bingoindustries.com.au)</p> <p>Project ID: The Proposal is in the initial stages of application for State Significant Development (SSD) under Schedule 1, Clause 23 (Waste and Resource Management Facilities) of the <i>State Environmental Planning Policy</i> (State and Regional Development) 2011 (State and Regional SEPP) prior to requesting Secretary’s Environmental Assessment Requirements (SEAR’s).</p> <p>Author of this memo: Samuel Brown</p> <p>Qualifications BMarSc, MMarSc, and MRes</p> <p>Experience: Five years of environmental assessment experience, including ecology fieldwork and reports.</p>
Site details	<p>Street address: 84-88 Burrows Road, Alexandria, NSW, 2015</p> <p>Lot and DP: Lot 1, DP867774</p> <p>Local Government Area: City of Sydney</p> <p>Description of existing site: The existing site is zoned as Industrial under the Sydney Local Environmental Plan, 2012. It is currently used as a skip bin management facility, office and carpark. The area is approximately 90% hardstand, comprising of a large warehouse, office and carpark. The site adjoins Alexandria Canal and has minimal vegetation, which is understood to be mostly planted native and exotic vegetation.</p> <p>Location map: See locality figure.</p> <p>Site layout map: See site layout figure.</p>
Proposed development	<p>Project description: The Applicant is seeking approval to develop a a new purpose-built facility to improve logistic efficiencies for the handling of putrescible waste between inner Sydney locations prior to bulk transfer to existing regional waste disposal and processing facilities.</p> <p>Proposed site plan: See site layout figure.</p>

Potential impacts to biodiversity values

Section 1.5 of the BC Act provides a description of biodiversity values, relevant to the Act that would normally require assessment within the relevant biodiversity assessment report (in this case, a BDAR). A description of additional biodiversity values is also provided in Section 1.4 of the *Biodiversity Conservation Regulation 2017* (BC Regulation).

Table 2 below provides an assessment of these defined biodiversity values, in relation to the Proposal site. This assessment has been undertaken by a suitable qualified person in accordance with the requirements in DPIE's fact sheet.

Table 2 Assessment of potential impacts of the Proposal on biodiversity values

Biodiversity value	Meaning	Relevance	Potential impacts
Vegetation abundance - 1.4(b) BC Regulation	Occurrence and abundance of vegetation at a particular site	NA	<p>The majority of the Proposal site is comprised of hardstand and man-made structures (approx. 90%), including one large warehouse, carpark and office.</p> <p>Vegetation is found in very small sections along the eastern and southern borders of the Proposal site, with some scattered patches along the western boundary (adjacent to Burrows Road) and northern boundary (refer to locality figure). During construction, these areas would be delineated with ATF fencing, or similar, and clearly marked as exclusion zones within all site mapping/figures and communicated to site staff on a regular basis.</p> <p>A search of the NSW government SEED¹ was conducted on 9 July 2021.</p> <p>A database search of NSW BioNet was conducted to identify any records of flora species within the Proposal site. The Native Vegetation of the Sydney Metropolitan Area mapping was also interrogated to identify the presence of mapped native vegetation. The datasets showed that there are no flora species records, or mapped PCTs within the Proposal site (refer figure PCT).</p>

¹ <https://live.seed.nsw.gov.au/about-seed>

Biodiversity value	Meaning	Relevance	Potential impacts
			<p>Desktop searches did not indicate the presence of any TECs or EECs within the Proposal site.</p> <p>Google Street view (February 2021) indicated presence of Callistemon and/or Banksia species, as well as Eucalyptus species within the site. These are considered likely to have been planted.</p> <p>The Proposal is limited to construction on an existing hardstand area. Minor vegetation clearing, including Callistemon and/or Banksia species, would be required close to Burrows Road as part of the Proposal.</p> <p>The Proposal will not have a significant impact on vegetation abundance as minimal clearing is expected.</p>
Vegetation integrity 1.5(2)(a) BC Act	Degree to which the composition, structure and function of vegetation at a particular site and the surrounding landscape has been altered from a near natural state	NA	<p>Minimal vegetation exists within the Proposal site and have not been identified as PCTs. The surrounding landscape is a highly modified urban area, where vegetation that does exist is mainly planted vegetation in unstructured and fragmented locations. Vegetation within the site has several strata absent, in particular, a groundcover layer and associated growth form species and has very low presence of function values (e.g., woody debris, leaf litter, hollow bearing trees).</p> <p>The Proposal is not likely to will not have a significant impact on vegetation integrity.</p>
Habitat suitability 1.5(2)(b) BC Act	Degree to which the habitat needs of threatened species are present at a particular site	NA	<p>Vegetation within the site and nearby to the west, may provide potential foraging habitat for the following threatened fauna species:</p> <ul style="list-style-type: none"> • <i>Pteropus poliocephalus</i> (Grey-headed Flying-fox) <p>The Proposal requires minor vegetation removal, close to Burrows Road, of approximately five (5) Callistemon and/or Banksia individuals. There are a high number of more favourable foraging</p>

Biodiversity value	Meaning	Relevance	Potential impacts
			<p>resources for the Grey-headed Flying-fox within the locality including Fig trees and flowering Eucalypts. Therefore, any foraging habitat occurring on the Proposal site or surrounds is unlikely to significantly affect the Grey-headed Flying-fox.</p> <p>There are no other suitable habitat features within the Proposal site for threatened species, including rocks, human made structures and geological features of significance. Therefore, the proposal would avoid any prescribed biodiversity impacts.</p> <p>The Proposal will not have a significant impact on habitat suitability.</p>
<p>Threatened species abundance 1.4(a) BC Regulation</p>	<p>Occurrence and abundance of threatened species or threatened ecological communities, or their habitat, at a particular site</p>	NA	<p>Several trees of Callistemon and/or Banksia species within the Proposal site that are expected to be cleared could provide minimal, opportunistic foraging habitat for the Grey-headed Flying-fox. Notwithstanding, the Proposal site would be located on a hardstand area, cleared of any remnant vegetation. For this reason, the Proposal site is not considered to provide significant habitat for any threatened ecological communities or threatened species.</p> <p>The Proposal will not have a significant impact on threatened species abundance.</p>
<p>Habitat connectivity 1.4(c) BC Regulation</p>	<p>Degree to which a particular site connects different areas of habitat of threatened species to facilitate the movement of those species across their range</p>	NA	<p>The Proposal site occurs in an already highly cleared and fragmented landscape. The Proposal would require very minimal (approximately 5 trees) vegetation clearing as it will be constructed on an existing hardstand area. Therefore, the Proposal would have minimal impact on native vegetation and therefore does not impact on habitat connectivity.</p> <p>The Proposal will not have a significant impact on habitat connectivity.</p>
<p>Threatened species movement</p>	<p>Degree to which a particular site</p>	NA	<p>Similar to habitat connectivity, the Proposal site provides no dispersal</p>

Biodiversity value	Meaning	Relevance	Potential impacts
1.4(d) BC Regulation	contributes to the movement of threatened species to maintain their lifecycle		<p>habitat that contributes to the movement of any threatened species. Some vegetation within the Proposal site may provide foraging habitat for the following species:</p> <ul style="list-style-type: none"> • <i>Pteropus poliocephalus</i> (Grey-headed Flying-fox) <p>There is minimal vegetation expected to be cleared for construction of the Proposal and is unlikely to significantly impact the Grey-headed Flying-fox as there are abundant foraging resources for the species within the surrounding area.</p> <p>The Proposal will not have a significant impact on threatened species movement.</p>
Flight path integrity 1.4(e) BC Regulation	Degree to which the flight paths of protected animals over a particular site are free from interference	NA	<p>It is possible that threatened species would fly over the Proposal site whilst moving within their home range or during migration. This is most likely the case for threatened bats and woodland birds. The Proposal site is located in an already highly modified landscape comprised of industrial facilities. The Proposal does not include any additional infrastructure that would increase interference with the flight path of any protected fauna.</p> <p>The Proposal will not have a significant impact on flight path integrity.</p>
Water sustainability 1.4(f) BC Regulation	Degree to which water quality, water bodies and hydrological processes sustain threatened species and threatened ecological communities at a particular site.	NA	<p>The Proposal site abuts the highly modified Alexandra Canal directly to the east and is in proximity to Sheas Creek.</p> <p>The Proposal site would not involve any discharge into the Canal. Therefore, the Proposal would not have any impacts on the Alexandra Canal or nearby water bodies.</p> <p>The Proposal will not have a significant impact on water sustainability.</p>

Summarising information from Table 2, it is considered unlikely that any threatened species or communities occur within the Proposal site, therefore it is unlikely that there would be a significant impact when considering the criteria in Section 1.5 of the BC Act and Section 1.4 of the BC Regulation.

Biodiversity Values Map

The Biodiversity Values Map (BV Map) has been produced by OEH and is used to identify land with high biodiversity value, as defined by the BC Regulation. It is used as one of the triggers for entry into the Biodiversity Offset Scheme (BOS) for proposals being assessed under Part 4 of the EP&A Act, except Division 4.1 SSD proposals. The biodiversity values map is a compilation of datasets that have been identified in Section 7.3 of the BC Regulation as being of high biodiversity value.

Querying the map is not typically required for SSD proposals since Section 7.9 of the BC Act requires entry into the BOS for all SSI and SSD proposals. Since the purpose of this memo is to demonstrate that a BDAR is not required for the Proposal, the BV map has been queried to confirm that no part of the Proposal site has been mapped as being of high biodiversity value.

The Biodiversity Values Map figure below (Figure 4) demonstrates that no biodiversity values have been mapped within the Proposal site. The nearest mapped biodiversity value is approximately 3 km southeast of the Proposal site, located in the Lachlan Swamps. The vegetation is identified as *'threatened species or communities with potential for serious and irreversible impacts'*. The specific vegetation type and reason for high biodiversity value was not identified by OEH on the BV Map. However, this vegetation has been identified as *PCT 664 Heathlands -Banksia heath on aeolian sands of eastern Sydney suburbs, Sydney Basin Bioregion* in *The Native Vegetation of the Sydney Metropolitan Area. Volume 2: Vegetation Community Profiles (Version 3.0)* (OEH, 2016). This PCT corresponds to the *Eastern suburbs Banksia scrub in the Sydney Basin Bioregion* which is listed as critically endangered under the BC Act.

Conclusion

This memo has considered the potential impacts of the Proposal on biodiversity values prescribed in Section 1.5 of the BC Act, Section 1.4 of the BC Regulation and the BV Map. The Proposal would have no impact on these biodiversity values or PCTs.

The Proposal is located on a previously cleared area of existing hardstand and within a highly urbanised area, with very minimal vegetation clearing expected as part of the Proposal. The small areas of vegetation within the site would be protected during construction as outlined in Table 2 above. There are also unlikely to be any prescribed impacts, as defined under the BC Regulation.

The Proposal site does not contain any land mapped as being of high biodiversity value on the BV Map and no PCTs are mapped on the Proposal site. The nearest mapped biodiversity value is approximately 3 km southeast of the Proposal site, located in the Lachlan Swamps.

In consideration of the above findings, it is requested that the Proposal be considered exempt from Clause (2) of Section 7.9 of the BC Act, meaning that the EIS need not be accompanied by a BDAR, prepared in accordance with the *Biodiversity Assessment Method 2017*.

References

- Department of Planning, Industry and Environment (DPIE) (2019) *Fact Sheet: How to apply for a BDAR waiver for a Major Project Application*. NSW Government, October 2019.
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Figures

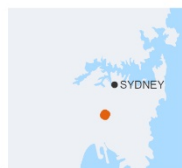


Figure 1 Area context for the Proposal site



Legend

- Proposal site
- Property boundary



1:1,500 at A4
 Coordinate System: GDA2020 MGA Zone 58
 Date issued: December 16, 2021
 Imagery: © Department of Customer Service 2020

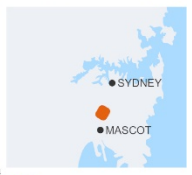


Path: C:\Users\hemaz4869\ARCADIS\30093727 - Alexandria WTS Scoping Report - GIS\A_Current\B_Maps\AlexandriaWTS_ScopingReport.aprx
 Created by: LG Updated by: EM_QA by: SB

Figure 2 Proposal site locality



- Legend
- Proposal site
 - Property boundary
 - Plant Community Type
 - Urban Exotic/Native



1:4,000 at A4
 Coordinate System: GDA2020 MGA Zone 56
 Date issued: December 17, 2021
 Imagery: © Department of Customer Service 2020

ARCADIS

Path: C:\Users\iemaz4089\ARCADIS\30093727 - Alexandria WTS Scoping Report - GIS\A_Current\B_Maps\Alexandria\WTS_Scoping\Report\aprx
 Created by: LG Updated by: EM QA by: SB

Figure 3 Plant Community Types (PCT) within the locality

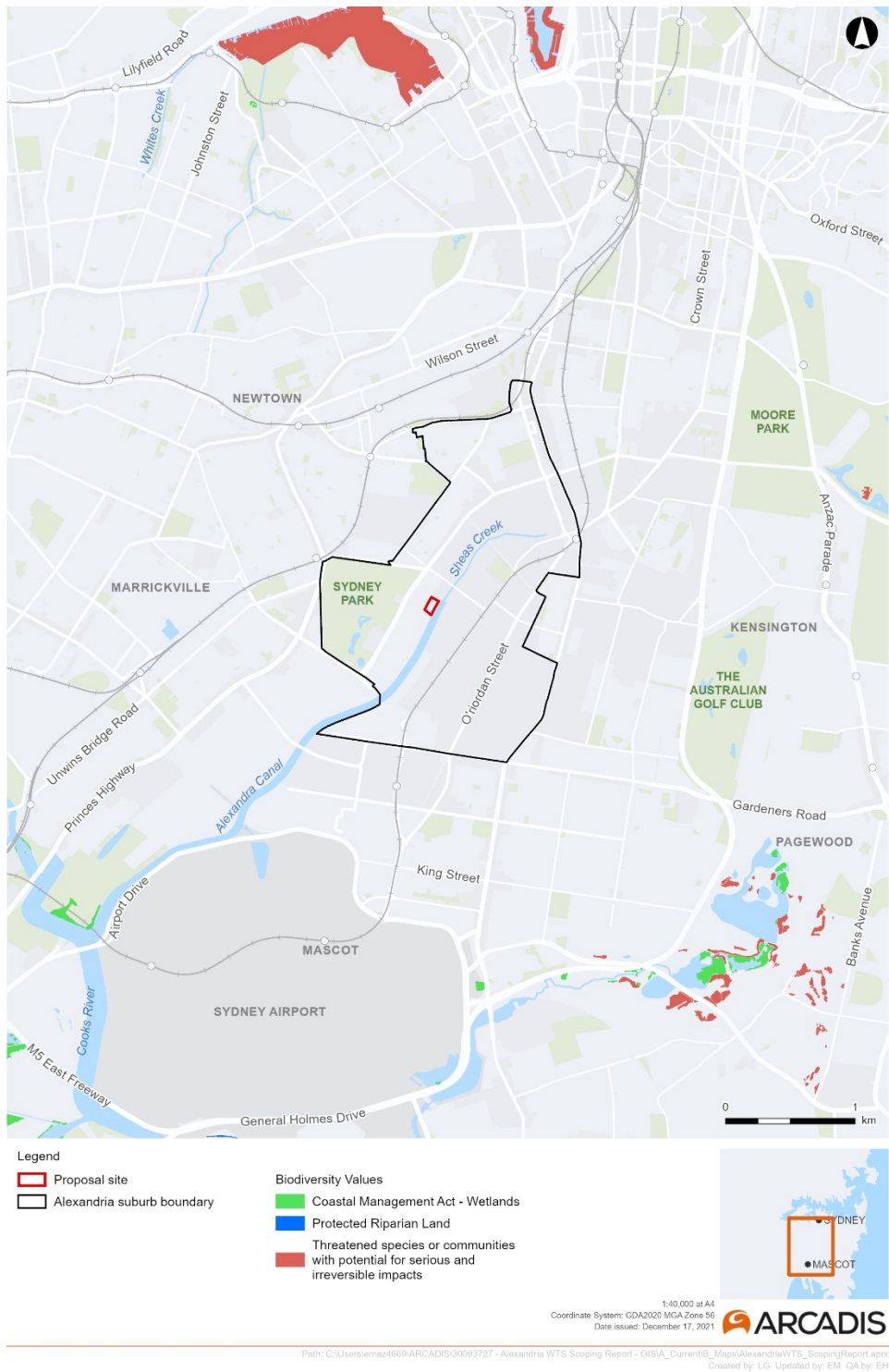


Figure 4 Biodiversity Values map and the Proposal site

