Our ref: S13/95

City of Botany Bay

28 May 2014

Mr Pascal van de Walle
Senior Planning Officer
Major Projects Assessment
NSW Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Mr Van de Walle

RE: Banksmeadow Waste Transfer Terminal (SSD 5855)

The Council has received notification from the Department regarding the above mentioned application for the construction and operation of a waste transfer terminal and associated rail infrastructure at 14 Beauchamp Road and 34-36 McPherson Street, Banksmeadow. Council has reviewed the Environmental Impact Statement (EIS) dated April 2014 prepared by Hyder Consulting Pty Limited.

The Department should be aware that the Banksmeadow Waste Transfer Terminal will be reported to Council on 4 June 2014 (Wednesday). A further submission will be submitted to the Department by 11 June 2014 once the issues has been finalised including comments from the Council's meeting. Based on Council initial review, the key issues are as follows:

PART A – SIGNIFICANT ISSUES

Traffic

Road Traffic Noise at Denison Street

Denison Street consists of industrial developments to the west and residential developments to the east. The road traffic noise generated by the additional truck movements will adversely impact on the residential developments at Denison Street, especially between 9pm to 6am. Hence, all truck movements to and from the Banksmeadow Waste Transfer Terminal during the night time period must travel via Foreshore Drive and Beauchamp Road at the following times:

- Monday to Sunday and Public Holidays - 9pm to 6am

Administration Centre, 141 Coward Street, Mascot NSW 2020 (PO Box 331 Mascot NSW 1460)
Telephone: (02) 9366 3666 Facsimile: (02) 9366 3777
E-mail: council@botanybay.nsw.gov.au Internet: http://www.botanybay.nsw.gov.au

Construction and Operational Traffic

To minimise impacts on Council's road system, all construction and operational traffic must use arterial road networks.

Traffic and Transport Impact Assessment

The assessment fails to take into account the construction and operation of the WestConnex Motorway.

Denison Street / Beauchamp Road intersection

Although the impact to the Denison Street and Beauchamp Road intersection is "*marginal*", it still results in additional traffic and vehicular delay and impact on the efficiency of the intersection. Hence, Council requests information on proposed mitigation measures (to the satisfaction of Council and RMS) be provided prior to development approval.

Beauchamp Road/ Perry Street/ Site Access intersection

The intersection layout indicates 10m of kerbside lane on the southern side of Beauchamp Road for westbound vehicles. This is considered insufficient by Council's Traffic Engineer. A minimum 20m kerbside lane is required.

In relation to the right turn movement from Beauchamp Road into the subject site, only 5 & 2 vehicles are estimated during the AM and PM peaks. As the estimated vehicles are negligible, this movement should be prohibited for the smooth operation of Beauchamp Road (southbound).

The proposed 60m left turn lane (i.e. Beauchamp Road to the subject site) must comply with relevant RMS requirements. Furthermore, a swept path diagram (i.e. the longest vehicle) must be submitted to Council for review. In addition, detailed signal plan must be submitted to Council for review and comments.

McPherson Street / Beauchamp Road intersection

The proposed solution (i.e. pruning trees and implementing kerbside parking) is considered inadequate. Council requires a more robust analysis and solution to this problem (i.e. installation of traffic light).

Construction Traffic Management Plan

A detailed Construction Traffic Management Plan must be submitted to Council for approval.

McPherson Street Entrance

Council requires clarification on the type of vehicles that will be accessing McPherson street entrance. In addition, there should be no queuing at McPherson Street.

McPherson Street

Table 8-41 provides a summary of the inbound and outbound transport logistics for non-putrescible waste. According to the table, a total of 32 truck movements (i.e. in and out) per day would access the site via McPherson Street. The frequency in the truck movement may result in the damage of road surface and spillage at McPherson Street. Hence, Veolia must enter into a Work Authorisation Deed with Botany Bay Council for the upgrade and maintenance of McPherson Street.

Shared Vehicular Access

Currently, vehicular access to Lot 2 DP 1006865 is serviced by the existing vehicular crossing/driveway along Beauchamp Road. Veolia proposes to utilise part of Lot 2 in DP 1006865 as the transfer terminal with the residual of the site to be used as a rail yard by Asciano (i.e. owner of Lot 2 DP 1006865).

The proponent must demonstrate that the proposed vehicular crossing/driveway can accommodate the existing and proposed uses of the site. Details of works to be undertaken to the existing vehicular crossing/driveway are required. Furthermore, the proponent must establish agreed an arrangement with Asciano on the shared use of the right of carriageway.

Flooding

New Drainage System and Flood Management Strategy

The site appears to have localised flooding. This is mostly located within to the site, with ponding experienced up to 0.5m. This pondage has been disposed via pumping water to Council's drainage system. Council is unclear what ARI this storm is, however this flooding and practice of pumping water must cease for the proposed development. The design and construction of a new drainage system and flood management strategy is required and must incorporate, but not be limited, to the following:

- The site underground drainage system must be design without surcharge for a minimum 1:20 year ARI storm event, with all roof gutters and down pipes for 100 year and overland flow paths to be provided for storms >20 year. Access driveways to and from the site should also be flood free in a 1:20 storm. An OSD system is to be provided and the drainage system (piped and overland flow paths) must be designed to also ensure the 100 year flows can be collected by the OSD system.
- The overland flow path must ensure all habitable floor and areas housing contaminated and hazard waste have at least 500mm freeboard, and the overland flow paths must not be directed through these critical areas. Additionally, the overland flow path should follow existing directions and must ensure no exacerbation and/or concentration of flows to a new area downstream.
- The Flood Risk Management Strategy must also be assessed and incorporated into the development, e.g. contamination, buoyancy of storage containers, park

vehicles, evacuation and risks of contamination not just for 100 year ARI storm event but must also include the PMF storm event.

- A tow dimensional flood study model assessment of the pre and post development flood risk must be carried out, to ensure no exacerbation to existing flooding conditions up and downstream of the site. This is to include neighbouring properties.

On-Site Detention (OSD)

The assessment must also consider the loss of flood storage due to the proposal and introduce appropriate measures to negate this loss. No OSD and/or flood storage areas are to be located under buildings, the storage area is to be located in an open, publicly accessible area. Importantly, the OSD must not be impacted by overland flows path and/or downstream back water flow that will render its design ineffective.

- The site's underground stormwater system must be piped to a public underground stormwater system. An OSD must be provided to ensure discharge from the site post development is at the natural state. However, at the point of connection to the public system, the capacity of the downstream public drainage system to accept these flows must also be assessed and if determined to be deficient, the system must be amplified and/or the OSD system must be further amplified to ensure the capacity of the downstream system is not exceeded.
- Discharge of water to the public system must not be contaminated. It must meet the water quality targets as specified in Botany Council's DCP and Stormwater Management Technical Guidelines (SMTG).
- Water Sensitive Urban Design (WSUD) must be incorporated into the development in accordance with S16 of SMTG.
- The design of the development must be in accordance with relevant sections of the NSW Flood Plain Development Manual and Council's SMTG.

Risk

Council's Risk Officer has reviewed the EIS and provides the following comments:

Asbestos

- The hazard associated with the demolition and removal of asbestos containing building materials and asbestos contaminated fill material is correctly identified in the PHA. Handled inappropriately there is a potential for adverse impacts on workers on site and for off-site exposure. The practices required for the safe handling and disposal of this material are however well established and the relevant sections of the EIS indicate an intention to follow such practices. There is always potential for breaches of good practice and it is therefore important to ensure that the contractors carrying out the work are reputable and experienced and that the workers carrying out the work and any others on site at the time are appropriately trained.

  It would be appropriate for a condition of consent to require that Council be advised, prior to the commencement of asbestos removal work, of the details

and relevant experience of the contractors involved and advised of the timing of such work and of any significant problems experienced in the course of the work.

It is noted that the PHRA indicates that the hazards associated with the construction of the facility will be managed through the Hazard and Operability study (HAZOP). This is somewhat unusual and it is not clear how carrying out a HAZOP would achieve this end. It is suggested instead that the applicant should consider carrying out a Construction Safety Study of the type set out in HIPAP No.7 Construction Safety. It would be expected that this would be a condition attached to any consent for the development. A HAZOP covering the detailed design and operation of the facility would however be beneficial for the facility and should also be covered by a condition of consent.

Hazard Associated with the Wastes

- The wastes to be received are intended to exclude hazardous materials other than those present in the minor quantities as part of normal domestic, commercial and industrial waste. The procedures outlined in the EIS for the receival, inspection and rejection of non-conforming materials suggest a fairly robust approach to ensuring non-conforming materials are not received. The PHRA is however short on detail and does not present any analysis of the possibility or consequences of any failure of the screening and rejection process.

  The case of hot loads and fires in the received wastes are considered, as are liquid spills, but there does not seem to have been any consideration of the potential for significant consequences regarding impact of fire, explosion or toxic release (either due to fires or direct release).

  In practice, the likelihood of substantial quantities of non-conforming materials being received in a single load should be small, particularly as in most instances the organisations consigning and delivering the loads and the terminal operator would have a vested interest in having a continuing relationship with the facility. Nonetheless, it would have been appropriate to consider the possibility of scenarios which might involve significant consequences (e.g. ammonium nitrate and diesel in the same load or combined on site; toxic or flammable gas cylinders illegally dumped in domestic or commercial waste; unexploded munitions illegally dumped in domestic or industrial waste; reactive materials which might produce a flammable or explosive gas on site or in transit to or from the site; corrosive materials which might compromise the integrity of the outwards containers etc.).

  It is recommended that a condition attached to any consent should require that a Final Hazard Analysis (FHA) be carried out and submitted for approval to Council prior to the commencement of construction and that in that FHA scenarios involving non-conforming waste be rigorously analysed to establish whether there is any potential for off-site consequences and what additional operational and technical safeguards, if any, might be warranted. Such

analysis should provide a valuable input to to site incident and emergency planning and preparedness.

Given the central importance of non-conforming load screening and the performance of drivers of waste trucks in both en route and on site in the event of an incident it is also recommended consent conditions require that all delivering drivers be required to have completed a site induction course before being permitted to carry out delivery runs. Operating procedure should also be required to provide that particular attention should be paid to checking the conformance of one-off or irregular waste loads.

- One of the cases which has been considered in the PHRA is fires in the waste involving loads which arrive hot and subsequently burn on-site or wastes which are ignited on-site. The PHRA and EIS indicate that in these instances the fires would be suppressed with the use of first aid fire fighting equipment (hose reels, extinguishers etc) and manually operated deluges. There is however no information on the nature of the deluges or their location within the facility and no indication of the volumes of water which might be applied, noting that the term 'deluges' is usually applied to high flow fire suppression equipment.

  This raises the question of the containment of contaminated water if the fire fighting methods are activated. The EIS/PHA indicates that applied firefighting water would drain first to the 20,000 litre leachate tank and then overflow or divert to the compaction pit. The leachate production is indicated as being 2000 litres per day. Based on these figures the tank would fill every 10 days if not emptied more frequently. The contents of the leachate tank are to be transferred to a 27,000 litre ISO tank for subsequent rail transport and disposal. It is not clear whether this would be a process undertaken once the leachate tank is full or near full and there does not seem to be any indication in the EIS of the capacity of the compactor pit.

  Without information on the credible volumes of water which could be applied to fight a fire and information on the design capacity of retention, no real conclusion can be reached on the likelihood of the discharge of contaminated water. The detailed design of this system and the fire suppression systems would appear to have been left to a later stage but it is important that the broad volume requirements be worked out early. It is often difficult and expensive to amend designs to accommodate extra containment, especially as the basic site levels, finished slab levels and bunding provisions might need to be changed.

  It is also not clear whether the leachate ISO tank would be located within the building and thus leaks/spills during transfer or holding of the tanks would be contained or lost to stormwater drainage.

  It is therefore recommended that a condition attached to any consent should be that, prior to the commencement of construction, the design of the fire fighting systems and the contaminated fire fighting water containment systems, taking into account the dual purpose of the containment and the effects of such use on

the available capacity, should be finalised and submitted to Council for approval.

- The PHRA also flags liquid spills in the transport of waste as a possibility and indicates that they will be dealt with in accordance with an appended flow chart. Given that liquid wastes are intended to be excluded and liquid 'leachate' quantities in loads are indicated as being low, it is not clear what the source of these leaks might be unless non-conforming loads are involved.

  The applicability of the flow chart is also somewhat questionable. For example, are there any valves on delivering trucks to shut? If the spill is on site would it not be preferable for the truck to proceed to the contained area rather than, or as well as, attempting containment with soil, booms etc. Presumably the procedure does only apply on site as notifying the weighbridge operator is shown as a key step? Or is the weighbridge operator the contact point for drivers en route?

  The pathways, roles and responsibilities in the flow chart are unclear. The left hand pathway ends in a box which says 'If situation cannot be controlled or spill is moving towards any waterways drains or grates' but leads nowhere and the first box has already indicated that the pathway to this point is only followed if the condition in this last box does not apply.

  The central pathway appears also to have a number of actions to be carried out by the Environmental Manager who, according to the flow chart, may or may not be involved.

  This would appear to be a very preliminary attempt at developing a spill procedure for the site. Clearly further work is needed on this and other operating and emergency procedures to make them site specific and relevant.

  It is recommended that prior to the commencement of operations the emergency and incident response plans and procedures be submitted for the approval of Council. The Operational Environmental Management Plan and the Waste Management Plan should similarly be finalised and submitted to Council for approval prior to commencement of operations.

Monitoring and Auditing

- The impact of a facility such as this is very much dependent on the performance of the operators. The relevant aspects of performance should be relatively amenable to monitoring and periodic auditing. Appropriate monitoring should be outlined in the Operational Environmental Management Plan and the Waste Management Plan.

  It is recommended that conditions of consent should provide for Council access on request to records including waste receivals by type, details of non-conforming loads received, and incident records (including any fires and spills). (The emphasis here is, of course, on hazard and risk matters but Council may also wish to cover other aspects such as noise, odour and dust.)

It is further recommended that a periodic Hazard Audit in accordance with HIPAP 5 - *Hazard Audit Guidelines* be undertaken by independent auditors and submitted to Council. The first audit should be undertaken at the end of the first twelve months of operation with the frequency of subsequent audits to be determined following the first audit. The major focus of the audit should be the effectiveness of the waste screening and non-conforming waste exclusion.

Quantitative Risk Assessment (QRA) of Dangerous Goods Transport along Denison Street

- The Department is currently carrying out a Quantitative Risk Assessment (QRA) of Dangerous Goods Transport along Denison Street, Hillsdale. Council is unable to provide detail risk comments until it is completed. It is recommended that the Department delay the determination of the application to the Banksmeadow Waste Transfer Terminal until the completion of the QRA.

Noise

Council's Acoustic Consultant has reviewed the EIS and a summary of the concerns are presented below:

Noise Monitoring

- Background (LA90) and ambient (LAeq) noise levels should be presented for both reference locations (i.e. 70 Denison Street and 30 Beauchamp Road).

- Existing road traffic noise exposure on Denison Street has not been clarified. Hence, LAeq, 9hr and LAeq, 15hr for both locations plus hourly traffic counts should be provided.

Assessment Goals

- The report fails to consider the City of Botany Bay, Standard Noise Criteria dated 23 May 2001.

Noise Assessment

- The noise model does not appear to have adopted the INP modifying factors in prediction or assessment of noise emissions from site.
- The noise model does not appear to have considered rail activities and use of container handlers on the south-east extent of the rail sliding. Activities in this area have the greatest potential to impact on the residential receivers identified.
- The report states that LAeq, period noise levels would be 2-3dB lower than the LAeq,15min levels reported. No justification or clarification has been provided.
- The noise model has under predicted noise emissions from the facility. Preliminary calculations for the use of a container handler (Lw110dB(A)), distance separation of 350m to Denison Street residents and 15DB shielding

from building to the north-east result in a noise contribution of 35dB(a). Considering two (2) container handlers operating simultaneously (Lw113dB(A)) would result in a contribution of 39dB(A), and exceed the assessment goal without considering other site noise sources. The noise contribution from these container handlers would also be higher when operating on the south-east portion of the site where more exposed to residential receivers. The construction noise predictions appear to more readily reflect noise emission from the site and raise queries with respect to the operational noise prediction.

Road Traffic Noise

- The report conducted noise monitoring at 30 Beauchamp Road with the results confirming high LAeq levels from traffic during both day and night hours. Based on the WM measurement results, referenced to the RTA Environmental Noise Management Manual (RTA, ENMM) –Section 8 the measurement location would be considered noise affected and be prioritised under the Noise Abatement Program (>LAeq,15hr 65 and LAeq,9hr 60dB(A)).
- Existing traffic noise for 70 Denison Street is not provided and is necessary.
- No hourly, day (15hr) or night (9hr) traffic volumes are reported for Beauchamp Road, either south of Denison Road or between Denison Street and Bunnerong Road.
- The 2dB allowance adopted by the report for traffic noise increases as a result of additional traffic from a development when all feasible and reasonable measures have been implemented. There does not appear to have been any consideration of alternative traffic routes to and from the site that would not directly affect the immediate residential areas.
- There are insufficient details in the traffic noise assessment to determine that the project noise goals can be achieved and there will be no adverse impacts as a result of the site generated traffic movements on residential properties fronting Denison Street and Beauchamp Road.
- Potential for significant noise impacts from "bunching "of truck movements during the night hours.

Shunting of freight rail and Loading and Unloading of Containers

Council is concerned with the potential noise issues generated by the shunting of freight rail carriages and the loading/unloading of the waste shipping containers (from forklift operations). Shunting and banging is tonal noise sources, irregular in nature and likely to lead to noise disturbance particularly late at night if not managed correctly.

It is recommended that some form of acoustic rubberised material be considered for the freight carriages to reduce the noise disturbance that will be created.

Consideration should be given to removing any high frequency alarm systems that are incorporated into the design and moving to a low frequency quacker style of alarm.

Section 94 Contribution

The City of Botany Bay being satisfied that the proposed development will increase the demand for public amenities within the area, and in accordance with Council's Section 94 Contribution Plan a contribution is required to be paid to Council prior to the issue of any Construction Certificate as follows:

Industrial Totals For Section 94 Contributions	
Community Facilities	$6,475.00
Administration	$1,050.00
Shopping Centre Improvements (City Wide)	$4,700.00
Open Space & Recreation	$43,625.00
Drainage	$0.00
Transport Management	$4,401,420.00
Total	$4,457,270.00

Dust and Odour

Vehicle access openings

Council is concerned that odours and dusts will escape through the vehicle access openings. Appropriate measures (such as plastic strips covering half of the vehicular access openings or closing the vehicles access opening normally with an automated opening system for truck entry and egress) should be incorporated. In addition, all odour monitoring and management plans are to be made available to the public by the applicant.

The proposal must comply with the following:

- The operation of all plant and equipment shall not give rise to an equivalent continuous (LAeq) sound pressure level at any point on any residential property greater than 5dB(A) above the existing background LA90 level (in the absence of the noise under consideration).

  The operation of all plant and equipment when assessed on any residential property shall not give rise to a sound pressure level that exceeds LAeq 50dB(A) day time and LAeq 40 dB(A) night time.

  The operation of all plant and equipment when assessed on any neighbouring commercial/industrial premises shall not give rise to a sound pressure level that exceeds LAeq 65dB(A) day time/night time.

  For assessment purposes, the above LAeq sound levels shall be assessed over a period of 10-15 minutes and adjusted in accordance with EPA guidelines for tonality, frequency weighting, impulsive characteristics, fluctuations and temporal content where necessary.

- The use of the premises shall not give rise to air impurities in contravention of the *Protection of the Environment Operations Act 1997*. Waste gases released from the premises shall not cause a public nuisance nor be hazardous or harmful to human health or the environment.

- No offensive odour from any trade, industry or process shall be detected outside the premises by an authorised Council Officer as defined in the *Protection of the Environment Operations Act 1997.*

Leachate

Leachate present outside the terminal building

Further clarification and mitigation measures are required for leachate present outside the terminal building (i.e. transferred from the terminal building from vehicles moving across the site).

Soils and Contamination

Council's Environmental Scientist has reviewed the EIS and has provided the following requirements:

- No conflict with the Orica Voluntary Management Plan remediation during ongoing operations, such as access for testing and analysis of groundwater.
- No washing out or cleaning of shipping containers at Banksmeadow unless an appropriate indoor enclosed wash bay is provided. It was advised at the site meeting that this would all occur at the southern terminal end.
- Formal inclusion in the Operational Environmental Management Plan a procedure and engagement process to manage incidents related to waste trucks that are associated with use or servicing of the transfer terminal, such as leaks of leachate or spillage of waste from trucks onto the roadway. For example, repeat offenders to be banned from delivering until appropriate procedures or remedies are followed, and support if a spill from a truck associated with use of the facility occurs offsite in the vicinity of the facility.
- The quality of stormwater leaving the site to meet the Botany Bay and Catchment Water Quality Improvement Plan (Sydney Metropolitan Catchment Management Authority, 2011) stormwater quality reduction targets as prescribed in Table 8 and as listed in the City of Botany Bay Comprehensive DCP – Section 3G.

PART B _ OTHER ISSUES

Amenities Block

The documentation fails to provide the location and details of the amenities block for truck drivers as stated in Section 3.2.2.

Building Heights and RLs

No building heights and RLs have been provided on the Architectural Roof Plan & Elevations (Drawing No: A004 Issue A) prepared by Hyder dated 21 February 2014. Furthermore, the natural ground level should be clearly indicated on the architectural plan and elevations.

Note: *As the ventilation stack exceeds 15.24m, the application should be referred to Sydney Airport Corporation Limited (SACL) for comment.*

Sections

No sections have been provided for the proposed waste transfer terminal and compactor area.

Maintenance Area

It is stated that a "*maintenance area and a diesel tank would be situated on the north-western side of the terminal building*". However, no additional information has been provided. As indicated in the submitted plans, the maintenance area is located outside the terminal buildings. It is unclear whether impact assessment (i.e. noise and air quality) has taken into account the maintenance area.

Bulk Earthworks

The EIS indicates that bulk earthworks (i.e. excavation and fill) will be required for the proposed waste transfer terminal. However, no details have been provided regarding the location and the level of excavation and fill.

Container Storage Area

The application indicates a container handling and storage area would be established in the north-western corner of the site. The proponent should clearly indicate the number of containers to be stored on-site and the maximum stacking height.

Ventilation System

The odour and dust filtration system in the terminal building must operate continuously (i.e. 24 hours a day 7 days a week).

Dangerous Goods

Section 8.7.3 states that 20,000 L of diesel fuel will be stored on the subject site. WorkCover NSW must be notified if the combustible liquid is stored with other fire risk dangerous goods as it exceeds the 10,000 L manifest threshold quantities. Refer to Table 6 of Hazardous and Offensive Development Application Guidelines (prepared by Department of Planning & Infrastructure) for additional information.

Community Involvement

Council recommends that the proponent establish and support a Community Consultative Committee. This would allow community representatives to make recommendation and comments on management plans and studies and raise issues during the operation of the waste transfer terminal.

Community Enhancement Program

Similar to the Clyde Waste Transfer Terminal, a community enhancement program should be established by the proponent to contribute towards community local community projects.

Mitigation Measures

All mitigation measures recommended in the EIS must be incorporated into the development approval.

Construction Environmental Management Plan (CEMP) and Operational Environmental Management Plan (OEMP)

CEMP and OEMP (including sub-plans) must be submitted to Council for review and comment prior to construction and operation.

Contingency Plan

Council recommends an operational contingency plan be prepared in the event of equipment failure (e.g. ventilation system), industrial action or any other situation that prevents the containerisation of any waste that has been in the terminal building in excess of 24 hours.

Annual Environmental Report

An Annual Environmental Management Report should be prepared by the applicant. The report should include the monitoring required by relevant legislations and policies for the development. In addition, the report should incorporate the following:

- Identify all the standards, performance measures and statutory requirements the development is required to comply with;
- Review the environment performance of the development to determine whether it is complying with the standard, performance measures and statutory requirements; and

The annual report should be reviewed and endorsed by an independent expert.

Error

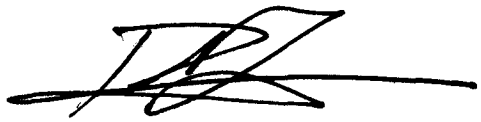
Page 300 of volume 1 for the Banksmeadow Transfer Terminal Environmental Impact Statement should state that the City of Botany Bay Council will be contacted, not Auburn City Council.

Recommended Conditions of Consent

Council will recommend conditions of consent once the issues have been finalised and after the Council's meeting.

If you have any questions regarding Council's submission please contact Mr Gilead Chen – Senior Strategic Planner on (02) 9366 3566 or the writer on (02) 9366 3553.

Yours faithfully



R J DOWSETT
DIRECTOR – PLANNING & DEVELOPMENT

Randwick City Council
a sense of community

Randwick City Council
30 Frances Street
Randwick NSW 2031
ABN: 77 362 844 121

Phone 1300 722 542
Fax (02) 9319 1510
council@randwick.nsw.gov.au
www.randwick.nsw.gov.au

Find us on:

Our Ref: F2004/07289

29 May 2014

Pascal van de Walle
Industry, Social Projects and Key Sites
NSW Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Pascal,

Re: Randwick Council's Submission on the EIS for the Banksmeadow Transfer Terminal Proposal

Randwick City Council appreciates the opportunity to comment on the Environmental Impact Statement (EIS) for the Banksmeadow Waste Transfer Terminal (the Banksmeadow TT), proposed within the City of Botany Bay Local Government Area (LGA).

The Proposal

Eight SSROC councils have recently entered into a contract with Veolia for the processing of their household residual waste at Veolia's Woodlawn Eco-Project site (councils including Ashfield, Botany Bay, Burwood, Kogarah, Leichhardt, Rockdale, Waverley and Woollahra). As Veolia's existing Clyde Transfer Terminal in Western Sydney is operating at full capacity, this new transfer terminal is proposed for the purpose of consolidating, containerising and transferring waste from the SSROC area to various waste processing facilities.

The proposal is for the construction of the Banksmeadow TT and associated rail infrastructure. This EIS has been prepared on behalf of Veolia to support the proposal, which is identified as a State Significant Development (SSD) with the Minister for Planning and Infrastructure as the consent authority.

The proposal involves two sites, being 34-36 McPherson Street and 14 Beauchamp Road, Banksmeadow, mainly used for industrial and commercial storage purpose. The proposal site is primarily within the LGA of Botany Bay, with the intersection between Beauchamp Road and Perry Street located in the Randwick LGA. Key construction components of the proposal include:

- an access road for putrescible and non-putrescible waste trucks entering and existing the facility from Beauchamp Road;

- incoming and outgoing weighbridges to check the waste type and weight of the waste being delivered to the facility;
- an enclosed building for the unloading and handling of waste;
- a hardstand area for temporary storage and manoeuvring of shipping containers prior to loading on to trains; and
- rail sidings for the loading of containers onto trains for transport to Woodlawn.

Once operational, the Banksmeadow TT would be capable of processing up to 400,000 tonnes of putrescible waste per annum for transfer via rail to Woodlawn and 100,000 tonnes of non-putrescible waste for transfer to resource recovery facilities. The site would be open to receive waste 24 hours a day, seven days a week.

Consultation

During preparation of the EIS, Veolia has consulted with statutory agencies and stakeholders (e.g. Environment Protection Authority, Randwick Council, etc) and relevant community groups and individuals (e.g. Matraville Precinct and nearest residents in Matraville). Key community concerns and comments Council previously provided on the DGRs are mostly in relation to traffic and access, noise and vibration, air quality and odour and soil and water contamination.

Council Comments

Driven by the increasing need for Advanced Waste Treatments (AWTs) of residual waste, Veolia proposes to develop a new transfer facility to service the Woodlawn Eco-Project site, to create more choices for the management of residual waste within Sydney. Council notes the benefits of the strategy which utilises alternative waste treatment technology to reduce the volumes of waste going to landfill and to use rail systems (for transportation of the waste to the processing facility) to reduce pressures on the local road network.

Council is however concerned about the potential adverse impacts of the proposal on the surrounding areas, especially when considering the cumulative impacts from the port operation and other adjacent industrial uses. Should the proposal be approved, Council recommends that appropriate mitigation measures and relevant conditions of consent be considered to minimise disturbance and impact on our local area.

Council's detailed comments and recommendations on various social and environmental issues are provided below.

Air Quality

Background

A site visit of the proposal site was conducted on 6 May 2014 with representatives from Veolia, Hyder, NSW Planning & Environment, Roads and Maritime Services, City of Botany

Bay Council and Randwick City Council. The site visit identified the proposed locations of all the structures and activities, the rail infrastructure, the adjacent land uses and the proximity of the proposal to all sensitive receivers from residential, commercial and industrial areas.

Another site visit to Veolia's existing Waste Transfer Terminal in Clyde was conducted on 15 May 2014 with representatives from Veolia, NSW Planning & Environment, NSW EPA, Roads and Maritime Services and Randwick City Council. The Clyde facility only collects and packs putrescible waste into containers.

During the Clyde site visit, it was identified that odour from the waste was significantly noticeable within the enclosed structure/building, but was less noticeable at the rest of the site.

Wilkinson Murray Pty Limited was commissioned to undertake an air quality assessment for the proposal and the Air Quality Impact Statement dated April 2014 was provided as part of the EIS for the proposed development.

Odour from Waste

The receipt of putrescible waste at the proposed facility has the potential to generate odour and therefore requires appropriate control measures. A range of odour mitigation and management strategies as well as housekeeping practices are proposed to ensure any potential odour impacts are minimised.

Veolia proposes to continually review its waste operations to improve environmental performance and as necessary, undertake alterations to operational management and facility design. The implementation of additional odour management measures in future would be considered by Veolia based on the operational performance of the facility.

Recommendation

Council stresses that Veolia undertake ongoing review and monitoring of the operational performance as a basis for future improvements and recommends that this be reflected in the plan of management and included as a condition of consent. See the suggested conditions (Attachment 1) for details.

Dust control

The non-putrescible waste has some potential to generate dust during the unloading of waste within the terminal building however the terminal building will be enclosed with dust suppression mechanisms in place. Potential dust emissions may also be generated during demolition and earthworks. It is noted that these sources are temporary in nature over the construction period. A number of mitigation measures have been proposed in the EIS to ensure dust generation during construction activities is controlled and the potential for

off-site impacts is reduced. It is suggested that the Department ensure these mitigation measures are to be implemented appropriately.

The Air Quality Impact Statement concludes that following the assessment of the odour impacts and potential dust associated with the proposal, the site can operate without causing any adverse air quality impacts to the surrounding environment.

Recommendation
Council considers the assessment undertaken and the proposed mitigation measures as acceptable and recommends conditions be imposed to ensure dust emissions during construction will not result in a nuisance to nearby residents or a potential pollution incident (see attached conditions).

Noise and Vibration

Background
Noise nuisance complaints in relation to NSW Ports operation (after hour activities in particular) are being received by Council from residents located in Matraville, particularly in streets located on elevated topographies. Given the close proximity of this proposal to NSW Ports and other existing industrial uses and its nature of 24-hour operation, Council is concerned that the cumulative noise impact from the existing and proposed development may cause increased disturbance to our local residents.

Operational Noise

Issues
A noise and vibration impact assessment was undertaken by Wilkinson Murray in November 2013. This assessment concluded that noise and vibration from the operations of the proposed development will comply with the requirements of the NSW Industrial Noise Policy, NSW Road Noise Policy and Interim Guidelines assessment of Rail Infrastructure Projects. However, Council remains concerned about the cumulative noise impact, which has already significantly affected the nearby residents.

Whilst the noise impact report addresses cumulative operational noise of the proposal, Council is concerned that the predicted noise measurements in the report may not be a true reflection of the source noise and the development may potentially increase the existing background noise. This is of concern having regards to the noise associated with the Ports operation and other surrounding industrial uses.

An inspection by Council officers was undertaken at the existing Clyde transfer terminal which has a similar design to the Banksmeadow proposal. During the inspection, it was identified that noise generated from forklift container movement was extremely loud. Veolia advised that the proposed development can not restrict the use of the forklifts during the night time period because usage will depend on waste amounts entering the site and

ARTC requirements for the train to enter and leave the site during the late night/early morning period. It was also advised that broadband devices (squawker device) will be used instead of the beeper devices on the forklifts.

Council is highly concerned about this additional source of noise and the impacts on the surrounding residential areas. It is noted that the EIS fails to address the following noise issues:

- Noise generated from waste trucks idling on site during the day time and night time period
- Noise from container banging and clunking as they are placed in the container storage area
- Noise generated from forklifts (container handlers) movements towards the southern end of the site where containers are removed from the wagons to be carried to the compactors and the container storage area, and
- Noise generated from beeping reversing alarms of external waste carrier vehicles.

Recommendation

It is recommended that a noise plan of management be developed and implemented to address operational noise issues including noise generated specifically with forklift movements of containers from rail carriages to the compacters and to the container storage area. Additional mitigation measures should be considered to effectively reduce the noise impacts of the development on the surrounding environment (e.g. development of a staff noise awareness program for the use of the forklifts/container movement activities as detailed in the recommended conditions).

It is also recommended that should the proposal be approved, a condition of consent (see attached) be included to ensure a noise impact assessment is undertaken within 1 month of operation of the proposed development. The assessment should include the cumulative noise impact from the surrounding industrial environment and all noise sources from the proposed development.

Ongoing Noise Monitoring

Issues

It has been identified that the proposal may not be operating at full capacity within the first year of operation. As the business expands, it is likely that noise emanating from the development may increase. The EIS does not include details of ongoing noise monitoring plans.

Recommendation

It is recommended that a condition be included which requires noise monitoring every six months to ensure the development and associated noise continue to comply with the requirements of the EPA industrial Noise Policy, NSW Road Noise Policy, and all other

relevant requirements.

The noise plan of management should also address requirements for ongoing noise monitoring, which is to be conducted on a six monthly basis to verify the development's compliance with relevant standards and provisions.

Rail Noise

Issues

The proposal includes two daily rail movements (one in and one out of the terminal) which will have 58 (wagons) container carriages on the locomotives entering and exiting the terminal. Due to ARTC requirements, it has been advised that the train is required to enter and exit the site during the late night and early morning period.

It is noted that the acoustic impact assessment considers 42 wagons while the EIS proposes 58 wagons on the locomotives. Clarity should be sought to ensure the assessment is undertaken appropriately based on the correct amount of wagons on the locomotives in relation to noise emissions.

The report notes that these rail movements are expected to increase the noise by 1dB. Council is concerned that noise from container movements on and off the carriages, rail gate alarms and rail carriage shunting has not been adequately assessed in the noise impact assessment. Noise generated from container movements on and off the rail carriages can cause a significant nuisance to nearby residents during the night time/early morning period.

Recommendation

It is therefore recommended that specific conditions (see Attachment 1) be included to address potential impacts generated from rail operation noise.

Road Noise

Issues

As noted earlier, the proposal will generate significant truck movements on a daily basis. The acoustic impact statement notes that the additional traffic would not result in a noticeable change in traffic noise levels on the surrounding road network. A relative increase of less than 1dB is anticipated on the proposed off-site routes. Therefore it is noted in the EIS that the potential for noise impacts associated with the additional traffic movements is considered negligible in accordance with the NSW Road Noise Policy.

It was noted that no data was available for existing vehicle volumes on McPherson Street at the time of preparing the noise impact assessment report. The assessment is therefore based on information provided by Veolia which suggests that at peak times, the existing industrial operators located on McPherson may generate up to 60 truck movements per

hour on this street and a typical average of approximately 20 additional truck movements per hour has been suggested.

Council notes that the noise associated with the additional truck movements is not considered to be negligible and the noise impact assessment fails to consider the noise impact from additional trucks on Beauchamp Road in conjunction with noise emanating from all noise sources of the proposed development. It is therefore considered that noise associated with truck movements on Beauchamp Road and McPherson Street during the night time and early morning hours has not been adequately assessed.

Recommendation
It is recommended that an additional noise impact assessment be undertaken to consider the cumulative impact from road noise and noise emanating from the proposal site at Beauchamp Road and McPherson Street prior to Department's determination of the application.

Construction Noise

Issues
It is noted that certain construction activities will require works to be undertaken outside standard operation hours. Council raises objection to construction works outside standard hours and is concerned that early morning/late night construction works in conjunction with the operation of surrounding industrial activities would have a significant impact on residential receivers within the area.

Recommendation
Council therefore recommends that the construction works should not take place outside standard hours. However, certain construction activities may be undertaken beyond the normal hours provided that the noise levels caused by these construction works (as well as other surrounding industrial activities) at the nearest affected residence comply with relevant standards/requirements AND these works are approved through an out-of-hours protocol as part of the Construction Noise and Vibration Management Plan and sufficient notification is given to local residents prior to the commencement of the works. See the recommended condition (Attachment 1) for details.

Soil and Contamination

Issues
The application involves two separate sites and accordingly, two separate environmental reports on land contamination have been submitted. It is understood that all assessments, remediation plans and validation reports will be reviewed as part of the statutory site audit process.

Based on previous site uses and prior reports, a number of primary contaminants of

potential concern with respect to human health and the environment have been identified, including Petroleum Hydrocarbons, Poly Aromatic Hydrocarbons (PAH), Asbestos, Heavy Metals, Benzo Toluene, Ethylbenzene and Xylenes (BTEX), Volatile Organic Compounds (VOC), Phenols, Cyanide, Ammonia, Polychlorinated biphenyls (PCB), Organochlorine pesticides (OCP) and Organophosphorus pesticides (OPP).

Given the heavy industrial uses in the surrounding area, it is considered that there is a significant potential for migration of contaminants onto the site through the movement of groundwater across the site.

The information submitted with the EIS states that the land will be remediated to meet the industrial criteria/standard. Where necessary, soil and groundwater contamination will be removed or treated onsite, otherwise (as with Asbestos) the contaminant(s) will be capped (when it is considered appropriate and safe to do so) and an environmental management plan will be implemented. It has also been documented that an acid sulphate soils management plan will be implemented prior to construction. Specific mitigation measures are detailed in Section 8.1.5.

Recommendation

The EIS notes that the statutory site audit process will be undertaken and relevant measures will be put in place to ensure the site (both land and groundwater) is remediated to a level suitable for the intended use. This is supported. However, to ensure the recommended mitigation measures are appropriately implemented, Council requests these measures be reflected and reinforced as conditions of consent. Conditions with regard to statutory site audit/statutory site audit statement, asbestos air monitoring (particularly towards the area facing Perry St, Matraville) and complaints management are recommended and included in Attachment 1.

Traffic and access

Construction Traffic Impacts

Issues

The Traffic and Transport Impact Assessment (P161) indicates that the highest-case traffic scenario during construction would be up to 120 truck movements per day. The assessment states that if evenly distributed by time, based on a 10-hour construction window per day, this would equate to 2 truck movements every 10 minutes and concludes that this would have a marginal impact on existing traffic.

It is however noted that due to the unexpected road traffic condition and work progress on site, it would be difficult to control the frequency of truck movements throughout the day. Heavy vehicle movements during construction could still place pressure on the existing road network, especially during peak hours.

Recommendations

It is therefore recommended that overlap of different construction items/stages be avoided as much as possible to reduce the daily truck movements and appropriate measures be considered as part of the Construction Traffic Management Plan (CTMP) to avoid multiple trucks travelling together towards or from the site.

Operational Traffic Impacts

Issues

The assessment estimates that the Banksmeadow TT, when operating at full capacity, will generate up to 430 truck movements per day associated with putrescible waste and about 310 truck movements each day in relation to non-putrescible waste.

This is likely to affect the performance of the Beauchamp Road/Perry Street intersection, as the "Average Delay" of the intersection will be increased from 12-14 seconds/vehicle currently to 27-49 seconds/vehicle. Mitigation measures are therefore proposed to reduce queuing and delays at this intersection (e.g. modified intersection layout and banning of the through movements between Perry St and the site). The SIDRA modelling indicates that the proposed measures would effectively restore the function of this intersection to its current operating capacity.

Council notes that these mitigation measures are proposed to avoid traffic impact on local residential streets (i.e. banning Perry St as a truck route to/from the site) and to maintain the current traffic capacity at the Perry St/Beauchamp Road intersection (i.e. upgrades of the intersection and provision of appropriate on-site queuing space to avoid impact of queuing trucks on the intersection). However, Council remains concerned about the impact of the additional truck movements on the local road network and the Matraville Town Centre and recommends relevant conditions be imposed to ensure the potential traffic impact is minimised.

Council also suggests that the education/enforcement programs, proposed as part of the Traffic Management Plan (TMP) to prevent drivers from using the prohibited routes in the vicinity of the development, will not achieve positive outcomes unless implemented in conjunction with effective monitoring systems.

Recommendation

It is recommended that:

- Randwick City Council be closely consulted during the development of the Traffic Management Plan (TMP). The Traffic Management Plan, together with a Traffic Control Plan, should be developed and implemented to ensure traffic from the proposed development avoids any local streets and specific traffic control measures be put in place to prohibit through movements between the subject site and Perry

Street (e.g. not to use solid green signals but left/right turn green arrows as part of the intersection traffic signal design).

- Randwick City Council be consulted and be closely involved in discussions throughout the detailed design (including development of engineered measures to restrict trucks using Perry St) and construction of the Beauchamp Road/Perry Street intersection upgrade works.
- the education/enforcement programs be implemented in conjunction with effective monitoring/reporting mechanisms, such as installation of high quality CCTV/surveillance cameras at or near the intersection for ongoing day time and night time monitoring of truck routes/behaviours and a 24 hour telephone line for lodging and handling complaints, etc.

Conditions to address the above traffic issues are also recommended. See attachment 1 for details.

Waste Management

Issues

At full capacity, the facility will receive 400,000 tonnes of putrescible and 100,000 tonnes of non-putrescible waste per year. When operational disruption occurs (e.g. unexpected power disruption), the applicant proposes in the operational contingency plan (Appendix K) that the facility will continue receiving waste until the terminal reaches its capacity. After that, the clients will be advised to redirect vehicles to alternative sites.

Council is highly concerned that the clients may not be able to redirect vehicles to any alternative site as they are in contract with the proponent for disposal of their waste. This could cause additional traffic movements within the vicinity of the site.

Recommendation

It is therefore recommended that the Department ensures relevant provisions are in place that require the applicant to make arrangements for and nominate alternative facility for clients to redirect vehicles in the event of service disruption.

Hazards and Risk

Issues

SEPP 33 provides the mechanism to determine whether a development is potentially hazardous or offensive.

To ascertain whether the proposal is potentially hazardous, the EIS provides the quantity of dangerous goods to be stored on-site, in comparison with the screening thresholds established in SEPP 33. Two notable goods were identified, being diesel as a Class C1 combustible liquid, and Acetylene as a Class 2.1 flammable gas. Appropriate storage and handling measures compliant with relevant Australian Standards have been identified in

the EIS for these dangerous goods. Accordingly, storage and handling of these goods were considered not to be potentially hazardous and a preliminary hazard analysis is not required. Notwithstanding this, consideration should still be given to the application of any HAZOP methodology and emergency response systems to address any potential loss of containment or similar emergency event.

In terms of whether the proposed development is potentially offensive, the EIS does not provide any conclusive statement but makes reference to the need for the environmental protection licence (EPL) for scheduled activities for waste processing and waste storage. If the proposal requires a licence under any pollution control legislation administered by the EPA under the Protection of the Environment Operations (POEO) Act, the proposal should be considered potentially offensive. The EIS broadly states that pollution incident management plans (PIRMP) would be prepared and implemented for construction and operation of the terminal in accordance with requirements of Part 5.7A of the POEO Act and the Protection of the Environment Operations (General) Regulation 2009. Having regard to these management plans, the EPA must consider whether the licence requirements can be met so that the proposed activity can be classified as not likely to be an offensive industry. It is also considered that the proposed mitigation measures (i.e. the Incident Response Plan (IRP) and PIRMP addressing these situations) should be clearly incorporated into the Operational Environmental Management Plan (OEMP), which should then be reviewed by the NSW Planning & Environment before any waste is received at the site.

The EIS makes reference to the Botany/Randwick Industrial Area Land Use Safety Study (2001) but does not comprehensively address the requirements of this Study in terms of the potential cumulative impact, including the potential for risk expanding cumulatively towards adjoining industries and the airport. It is noted that approximately 20% of trucks accessing the proposed terminal would use the designated 'dangerous goods route' along Denison Street. In relation to dangerous goods transportation, the Study states that "The fact that a property is located outside a region in which it is recommended that there be no residential intensification does not necessarily indicate the suitability of that site for development. A merit-based assessment should still be applied." Accordingly, an assessment of the hazard risks along this route (which contains some residential uses) should be undertaken in accordance with the provisions of the Study.

The provisions of the Study should be applied to demonstrate compliance with relevant risk criteria. There should be no increase in cumulative risk (including both individual and societal) beyond the provisions shown in Figures 9 and 10 of the Study. The EIS makes reference to the recommendations of the Study in Section 3.2.1.1 of Appendix N Preliminary Hazards and Risk Assessment Study and states that the EIS only addresses the first of these recommendations being that:

"Future developments in the Botany/Randwick industrial area should be subject to early risk assessment and comprehensive environmental impact processes to conclusively demonstrate that they will not contribute to risk impacts outside the industrial area that are

inappropriate for surrounding land uses."

The Study requires the following actions in relation to this recommendation:

- 1.1 There should be no significant increase in the quantities of toxic compressed or liquefied gases stored or handled within the industrial area.
- 1.2 Proposals to expand industrial facilities in the area should be subjected to the seven-stage assessment process under the Environmental Planning and Assessment Act 1979 and demonstrate compliance with relevant risk criteria.
- 1.3 The Director-General's requirements for the preparation of an Environmental Impact Statement (EIS) should incorporate the above requirements to ensure appropriate assessment is carried out.
- 1.4 Should conditions in the Botany/Randwick industrial area change to a significant degree, through facility commissioning, decommissioning, expansion or production changes, this study should be updated to reflect potentially altered cumulative risk impacts on surrounding land uses.

The EIS should address these specific actions and in particular the application of a seven-stage assessment process to demonstrate compliance with relevant risk criteria. In addition, all other recommendations arising from the Study, and as referred also in Section 3.2.1.1 of Appendix N of the EIS, should be comprehensively addressed in the EIS.

The EIS should not merely state that the impact of cumulative risk in the Port Botany area from potential hazardous events are broadly acceptable with no reference to, and very little analysis in terms of, the provisions of Figures 9 and 10 of the Study. Rather, appropriate analysis in terms of requirements of the Study must be undertaken prior to any determination of the application.

Recommendation

- Appropriate analysis of cumulative hazard risks along the designated 'dangerous goods route' at Denison Street, and the potential cumulative impact of the proposed development to the existing neighbouring industrial activities and the airport should be undertaken in accordance with the provisions of the Land Use Safety Study.
- Appropriate analysis in accordance with the requirements of the Land Use Safety Study must be undertaken prior to any determination of the application.
- All HAZOP methodology and emergency response systems to address any potential loss of containment or similar emergency event shall be included as a mitigation measure and condition in any Instrument of Approval for the project.
- All HAZOP methodology and emergency response systems to address any potential loss of containment or similar emergency event shall be reviewed by the NSW Planning & Environment and/or EPA before waste is received at the site.
- The Incident Response Plan (IRP) and Pollution Incident Management Plan (PIRMP) addressing the specific situations should be incorporated into the Operational

Environmental Management Plan (OEMP) which should then be reviewed by the NSW Planning & Environment and/or EPA before any waste is received at the site.

Greenhouse Gas Assessment

The proponent has calculated annual Greenhouse Gas (GHG) emissions from the project, representing approximately 0.0002% of Australia's total annual GHG emissions. Veolia has committed to the use of B20 biodiesel for diesel powered machinery on the site. Also, redirecting waste through the Banksmeadow TT to the Woodlawn Eco-Project site will offer an abatement opportunity for decomposition of waste when compared to a 'business as usual' scenario. Council views this as a positive outcome in terms of greenhouse gas emission.

Visual Impact

Landscape

Issues

Landscaping should form a key element in the proposal given the scale of the development and the potentially offensive nature of the operation. It serves as an important visual and amenity buffer for the public domain and employees in the adjoining industrial premises.

The landscape information currently provided in the EIS is highly conceptual. The main issues are listed below:

- The landscape drawings are diagrammatic and illustrative only. Whilst it is understandable that the technical details would be included in the construction certificate documentation, the existing level of information is considered scant and does not appropriately describe the scope and level of landscape works involved. Based on past experience, landscape works are particularly susceptible to be overlooked during the construction and occupation phases, and a reasonably detailed set of design drawings would assist in ensuring their eventual implementation.
- The existing trees to be retained and removed at the McPherson Street and Beauchamp Road frontages and throughout the rest of the site are not clearly shown and annotated on the drawings.
- The design of the bio-retention basin and pond is overly simplistic. The drawings specifically mention that the information is "not for design purposes". The proposal at this stage does not demonstrate sufficient commitment that these sustainability features will be implemented.
- The EIS (page 272) suggests that "*landscaping and visual screening would also be provided at the Beauchamp Road entrance to the Site*". There is no corresponding information shown on the plans to support this claim. In fact, the realignment of the

Beauchamp Road entry would require construction of a new turning bay involving removal of existing vegetation.

Having regard to the prominently visible intersection between Perry Street and Beauchamp Road, a high quality landscape design for this site frontage should be incorporated in the proposal.

- The proposed tree and shrubbery planting at the McPherson Street frontage appears to be random and demonstrates no coherent pattern. In order to avoid potential entrapment points and improve safety and security for workers, a more formalised planting layout should be adopted.
- The site fencing and gate at the McPherson Street and Beauchamp Road frontages are not shown on the drawings.

Recommendation

A more developed landscape design addressing the above issues should be submitted for assessment. The design should be fully described in a revised set of landscape drawings prepared by a qualified landscape architect.

If this is not supported by the Department, then fully detailed landscape drawings should be submitted at the construction certificate stage. A condition is recommended to address this matter (see Attachment 1).

Building Design

Issues

The proposal includes the construction of a single-storey office building facing McPherson Street. The office building has a traditional cottage character with a hipped roof and appears to be visually awkward when set against the 13.5m high, steel-clad terminal building. A contemporary building style for the office would deliver a consistent design expression for the development as a whole.

The EIS mentions that an amenities block for truck drivers will be provided in the middle part of the site. No information for such a facility is shown on the drawings.

No objections are raised against the proposed light olive green colour for the claddings of the terminal building. However, the EIS does not contain any detailed finishes/materials schedule. It is unclear as to whether the colours depicted on the drawings represent the true colours of the finishes scheme.

The use of translucent materials to divide the long terminal facades is supported; however, this is not clearly represented in the drawings.

Recommendation

It is recommended that the office building adopts high standard of design features to achieve better design outcomes, which will help improve the community acceptability of

such type of development.

See also the recommended condition of consent (Attachment 1) relating to building design.

Signage

Issues

The drawings show two business identification signs (being one on the East Elevation and one on the South Elevation). Signage when properly designed could enhance the character of the building to which it is attached. The current drawings do not contain any dimensions or illumination details.

Recommendation

It is recommended that the materials, dimensions and illumination details of all proposed signage (with the exception of those that fall within the definition of Exempt Development under SEPP: Exempt and Complying Development Codes) to be submitted for assessment.

Light Overspill / Glare

The proposed facility will be operated on a 24 hour basis. Lighting devices are an essential component in the development. A condition (see attached) is recommended to ensure all future lighting will not cause a nuisance to the surrounding areas as a precautionary measure.

Construction and Operational Management

Issues

Chapter 9 of the EIS mentions that a range of construction and operational management plans would be prepared following approval of the proposal. Specifically, Section 9.3 describes the indicative contents for each of those management plans. The actual documents have not been prepared at this stage.

Recommendation

Should the proposal be supported, the Department should impose appropriate conditions to ensure the following:

- The various construction management plans will be completed and approved by the relevant certifying authority prior to the commencement of construction works.
- The various operational management plans will be completed and approved by the relevant certifying authority prior to occupation and operation.

Submissions/comments received from local residents on the EIS (including those forwarded to Councillors and a recent motion from the Matraville Precinct Committee) are also enclosed for your consideration (see Attachment 2). It is noted that Council may have

additional comments to add to this submission, which will be forwarded to the Department later.

Should you have any questions regarding Randwick City's submission, please contact Ting Xu, Environmental Planning Officer, on 9399 0890.

Yours sincerely

Alan Bright
MANAGER STRATEGIC PLANNING

Attachment 1 Recommended Conditions of Consent

Landscaping

Detailed landscape drawings and specifications are to be submitted to and approved by the certifying authority with the construction certificate and the landscaping is required to be implemented in accordance with the approved plans and specifications. The landscape drawings and specifications are to be prepared by a qualified Landscape Architect who has membership with the Australian Institute of Landscape Architects (AILA) or equivalent.

The landscaping plans/specifications are required to include the following components:

- A site plan at an appropriate scale showing: existing site boundaries; existing trees within the property (clearly identified as being retained or removed); existing street trees (clearly identified as being retained or removed); features on adjoining sites within 6 metres of the common property boundary (buildings, trees, other structures etc); council's footway; existing and proposed ground levels shown as spot heights and/or contours over the site, at site boundaries, and at the base of the tree/s to be retained; proposed building envelope; proposed areas of pavement; and proposed landscaped areas.

- The position, canopy spread (location of dripline), trunk diameter, height and names of all existing trees upon the site and adjoining sites within 6 metres of the common property boundary which are likely to be affected by the development.

- A planting plan at a scale of 1:100 or 1:200 indicating the location of all proposed planting and existing trees to be retained. All plants are to be drawn at their mature size with a dense planting of shrubs, accent plants and ground covers within all garden beds so that a continuous planted cover is achieved. Plant spacings are to be clearly indicated for all accent and groundcovers.

- A planting schedule listing all plants by botanic & common names, plant numbers, plant spacings for groundcovers and accent planting, pot sizes, the estimated size of the plant at maturity (height & spread) and proposed staking methods when applicable.

- Details of Tree Protection measures, including details of compliance with relevant conditions of consent.

- Position of existing and proposed site services including water, gas, electricity, sewer, stormwater and any easements etc.

- Elevations and sections through the site showing the existing and proposed groundlines, building elevations, and mature height of proposed planting.

- An automatic irrigation system throughout all planted areas to ensure satisfactory maintenance of the landscaping. The system shall provide full coverage to all the planted areas with no overspray onto driveways and pathways. The system shall comply with all Sydney Water requirements.

Building design

The reflectivity index of all glazing materials must not exceed 20%. Details demonstrating compliance must be submitted to the satisfaction of the certifying authority prior to the issuing of any construction certificate.

Light Overspill / Glare

External lighting to the premises shall be designed in accordance with Australian Standard 4282: Control of the Obtrusive Effects of Outdoor Lighting so as not to cause a nuisance to nearby residents or motorists and to ensure that light overspill does not affect the amenity of the area.

Soils and contamination

Statutory site audit

1. The land must be remediated to meet the relevant criteria in the National Environment Protection (Assessment of Site Contamination) Measure (NEPM) 1999 and the following requirements must be complied with:

- A NSW Environment Protection Authority (EPA) Accredited Site Auditor, accredited under the Contaminated Land Management Act 1997, must be appointed to assess the suitability of the site for its intended development and use. A Site Audit Statement and Summary Site Audit Report is to be submitted to the consent authority and/or EPA which verifies that the land has been remediated and the site is suitable for the intended development and satisfies the relevant criteria in the NEPM 1999.

  Any requirements contained within an Environmental Management Plan (EMP) which forms part of the Site Audit Statement and Site Audit Report, form part of this consent and must be implemented accordingly. Council is required to be consulted with prior to the development of the EMP and any comments made by Council are required to be taken into consideration prior to finalising the EMP.

- The site remediation must be carried out to the satisfaction of the Accredited Site Auditor and a Site Audit Statement and Summary Site Audit Report must be submitted to the consent authority and/or EPA **prior to**:
  i) **a construction certificate being issued for any building work** (other than shoring work, piling work and retaining structures)

- Remediation works shall be carried out in accordance with the requirements of the Contaminated Land Management Act 1997, environmental planning instruments applying to the site, guidelines made by the NSW Environment Protection Authority (EPA) and NSW Planning & Infrastructure, Randwick City Council's Contaminated Land Policy 1999 and the Protection of the Environment Operations Act 1997.

- Should the remediation strategy including the 'capping' or 'containment' of any contaminated land, details are to be included in the Site Audit Statement (SAS) and Environmental Management Plan (EMP) to the satisfaction of the Site Auditor.

Details of the SAS and EMP (including capping and containment of contaminated land) are also required to be included on the Certificate of Title for the subject land under the provisions of section 88 of the Conveyancing Act 1919.

- Fill material that is imported to the site must satisfy the requirements of the NSW Protection of the Environment Operations (Waste) Regulation 2005 and the NSW Environment Protection Authority (EPA) Waste Classification Guidelines (2008). Fill material must meet the relevant requirements for Virgin Excavated Natural Material (VENM) or be the subject of a (general or specific) Resource Recovery Exemption from the EPA.

  Details of the importation of fill and compliance with these requirements must be provided to the satisfaction of the Environmental Consultant and Site Auditor.

- A Site Remediation Management Plan must be prepared prior to the commencement of remediation works by a suitably qualified environmental consultant and be implemented throughout remediation works. The Site Remediation Management Plan shall include measures to address the following matters:
    - general site management, site security, barriers, traffic management and signage
    - hazard identification and control
    - worker health & safety, work zones and decontamination procedures
    - prevention of cross contamination
    - site drainage and dewatering
    - air and water quality monitoring
    - disposable of hazardous wastes
    - contingency plans and incident reporting
    - details of provisions for monitoring implementation of remediation works and persons/consultants responsible.

  A copy of the Site Remediation Management Plan is to be forwarded to the consent authority and/or EPA prior to commencing remediation works.

- The works must not cause any environmental pollution, public nuisance or, result in an offence under the Protection of the Environment Operations Act 1997 or NSW Work Health & Safety Act 2011 and Regulations.

- Any new information which is identified during remediation, demolition or construction works that has the potential to alter previous conclusions about site contamination or the remediation strategy shall be notified to the Site Auditor and the consent authority immediately in writing.

  The written concurrence of the consent authority must be obtained prior to implementing any changes to the remediation action plan or strategies.

2. The Site Audit Statement must, where no guideline made or approved under the NSW Contaminated Land Management Act is available (as with asbestos), clearly state the source of the standard adopted in determining the suitability of the land for the intended development and use and must also demonstrate its suitability to the consent authority.

Asbestos contamination

3. In relation to any asbestos contamination, a comprehensive remediation strategy and remedial action plan must be developed and implemented, to the satisfaction of a suitably qualified and experienced specialist and the Site Auditor.

The remediation strategy and remedial action plan must demonstrate that the land will be remediated in accordance with relevant guidelines (if any) and to a level or standard where no unacceptable health risk remains from asbestos exposure, which shall be verified upon completion of the remediation works to the satisfaction of the Site Auditor.

Complaints management

4. The applicant is to engage the services of a suitably qualified environmental consultant to respond to enquiries and complaints made by the community or Randwick Council in relation to contamination, remediation and construction site management matters.

A specific contact number is to be made available for such enquiries and complaints (including an after-hours emergency contract number) and a complaints register is to be maintained to record all such enquiries, complaints and actions taken in response to same, which is to be made available to Council officers upon request.

Noise

Operation

1. An acoustic report, prepared by a suitably qualified and experienced consultant in acoustics, must be provided to the consent authority **within 1 month of operation**, which demonstrates and confirms that the relevant provisions of the Protection of the Environment Operations Act 1997, Industrial Noise Policy and the noise criteria and requirements contained in this consent has been satisfied (including any relevant approved acoustic report and recommendations). The assessment and report should include all relevant fixed and operational noise sources operating simultaneously during the night time period e.g. rail noise, traffic noise, mechanical plant and equipment, container movement, forklift movements etc.

The report should include but not be limited to:

- All relevant fixed and operational noise sources operating simultaneously during the night time period e.g. rail noise, traffic noise off and onsite, mechanical plant and equipment, container movement, forklift movements etc
- Truck noise idling waiting to use the transfer station during the night time period
- Noise from beeping reversing alarms of external waste carrier vehicles
- Noise from the rail gate alarms and rail shunting
- Noise from container banging and clunking
- Noise from vehicles using Beauchamp Road and McPherson Street in conjunction with noise generated from the proposed development during the night time/early morning period

2. The proposed use of the premises and the operation of all plant and equipment shall not give rise to an 'offensive noise' as defined in the Protection of the Environment Operations Act 1997 and Regulations.

In this regard, the operation of the premises and plant and equipment shall not give rise to a sound pressure level at any affected premises that exceeds the background (LA90), 15 min noise level, measured in the absence of the noise source/s under consideration by more than 5dB(A). The source noise level shall be assessed as an LAeq, 15 min and adjusted in accordance with the NSW Environmental Protection Authority's Industrial Noise Policy 2000 and Environmental Noise Control Manual (sleep disturbance).

3. There are to be no emissions or discharges from the premises which give rise to a public nuisance or result in an offence under the Protection of the Environment Operations Act 1997 and Regulations.

4. Ongoing acoustic monitoring, undertaken by a suitably qualified and experienced consultant in acoustic is to be conducted on a , which demonstrates and confirms that the relevant provisions of the Protection of the Environment Operations Act 1997, Industrial Noise Policy and the noise criteria and requirements contained in this consent has been satisfied (including any relevant approved acoustic report and recommendations). The assessment and report should include all relevant fixed and operational noise sources operating simultaneously during the night time period e.g. rail noise, traffic noise, mechanical plant and equipment, container movement, forklift movements etc. The annual acoustic monitoring should be available on request from a appropriate regulatory authority.

5. An Operational Noise Management Plan shall be developed and implemented, which outlines how the operations of the business will address the following;

- Ensure compliance with the relevant conditions of approval,
- Ensure compliance with relevant noise criteria and minimise noise emissions and associated nuisances,
- minimise the potential environmental and amenity impacts upon nearby residents,
- Effectively manage and respond to resident complaints,
- Encourage and educate waste carrier vehicles on quiet noise practices e.g. implementation of broadband-type (squawker) reversing alarms on vehicles, no idling on site when waiting to enter the waste transfer station and one way driving routes to reduce the use of reversing alarms, and
- Ensure ongoing acoustic monitoring is undertaken every six months.

6. A staff noise awareness programme is to be developed and implemented which aims to minimise noise emissions from general forklift/ container carrier operations. The programme should address noise emissions from the following;

- Judicious use of the throttle during lifting as well as travel
- Care during aligning forklift spreader during interface with the container (where applicable)
- Care during the container lifting process
- Care during the interface with trucks, rail carriages or other stacked containers
- Immediate reporting and repair of any machinery defects which may cause excess noise generation

Construction activities

7. A Construction Noise & Vibration Management Plan, prepared in accordance with the consent authotiry for Construction Noise and Assessing Vibration, by a suitably qualified person, is to be developed and implemented prior to commencing site work and throughout the course of construction.

a) Noise and vibration emissions during the construction of the building and associated site works must not result in damage to nearby premises or result in an unreasonable loss of amenity to nearby residents.

   Noise and vibration from any rock excavation machinery, pile drivers and all plant and equipment must be minimised, by using appropriate plant and equipment, silencers and the implementation of noise management strategies.

b) The Construction Noise & Vibration Management Plan must include details of measurements, analysis and relevant criteria and demonstrate that the noise and vibration emissions from the work satisfy the relevant provisions of the Protection of the Environment Operations Act 1997, current OEH/DECC Guidelines for Construction Noise and Assessing Vibration and conditions of consent.

c) A further report/correspondence must be obtained from the consultant as soon as practicable upon the commencement of works, which reviews and confirms the implementation and suitability of the noise and vibration strategies in the Construction Noise & Vibration Management Plan and which demonstrates compliance with relevant criteria.

d) Any recommendations and requirements contained in the Construction Noise & Vibration Management Plan and associated reports are to be implemented accordingly and should noise and vibration emissions not comply with the terms and conditions of consent, work must cease forthwith and is not to recommence until details of compliance are submitted to the consent authority and the PCA.

   A copy of the Construction Noise & Vibration Management Plan and associated acoustic/vibration report/s must be maintained on-site and a copy must be provided to the appropriate regulatory authority and the Principal Certifying Authority accordingly.

Out of hours construction activities

8. Any construction works to be undertaken outside the standard hours shall be adequately assessed in relation to noise emissions prior to the commencement of the works. Construction works may be undertaken outside the standard hours in the following circumstances:

a) Acoustic measurements from the proposed construction operations during the night time/early morning period, in conjunction with other related surrounding industrial activities, should be determined at the nearest affected residence. These measurements should meet the requirements of the NSW Industrial Noise Policy and all other relevant guidelines and conditions of consent;

b) For the delivery of materials required by the police or other authorities for safety reasons; or

c) Where it is required in an emergency to avoid the loss of lives, property and/or to prevent environmental harm; or

d) Works approved through an out-of-hours work protocol prepared as part of the Construction Noise & Vibration Management Plan, provided local residents are informed of the timing and duration at least 48 hours prior to the commencement of the work.

9. Monthly acoustic measurements are to be undertaken when out-of hours construction activities are being undertaken. Considering noise from construction activities varies, depending on the type of activity being undertaken, an acoustic assessment should be undertaken at commencement of each new construction activity proposed beyond standard hours.

Air quality

1. The Odour Management Measures outlined in 8.3.1 of the Banksmeadow Transfer Terminal Air Quality Impact Statement prepared by Wilkinson Murray Pty Limited (Report no. 13035-AIR Version B) dated April 2014 are to be implemented at all times.

2. The use and operation of the premises shall not give rise to an environmental health or public nuisance.

3. There are to be no emissions or discharges from the premises which give rise to a public nuisance or result in an offence under the Protection of the Environment Operations Act 1997 and Regulations.

4. The location and height of the discharge of mechanical ventilation and exhaust systems are required to satisfy the relevant provisions of the Building Code of Australia and AS 1668 and details are to be provided in the relevant plans/specifications for the **construction certificate.**

5. Emission control equipment shall be provided in the mechanical exhaust system to effectively minimise the emission of odours.

6. Details of the proposed emission control equipment must be provided in the relevant plans and specifications for the **construction certificate** for the development, to the satisfaction of the certifying authority.

7. An air quality impact assessment, prepared by a suitably qualified and experienced consultant in air quality, must be provided to the Consent Authority **within 1 month of the issuing of an occupation certificate**, which demonstrates and confirms that the relevant provisions of the Protection of the Environment Operations Act 1997 and the criteria have been satisfied (including any relevant recommendations). The assessment and report must include all relevant odour sources within the site boundary.

8. A plan of management shall be maintained on site to include, but not limited to:

- Measures to ensure compliance with the relevant conditions of approval,
- Measures to ensure compliance with relevant odour criteria and minimise odour emissions and associated nuisances

- Minimise the potential environmental and amenity impacts upon nearby residents
- Review of on site operations and effectiveness of odour management measures
- Routine air quality assessments
- Effectively manage and respond to resident complaints

The plan of management must be implemented and a copy of the plan must be kept on site at all times and made available on request.

9. During demolition excavation and construction works, dust emissions must be minimised, so as not to result in a nuisance to nearby residents or result in a potential pollution incident.

Adequate dust control measures must be provided to the site prior to the works commencing and the measures and practices must be maintained throughout the demolition, excavation and construction process.

Dust control measures and practices may include:

- Provision of geotextile fabric to all perimeter site fencing (attached on the prevailing wind side of the site fencing).
- Covering of stockpiles of sand, soil and excavated material with adequately secured tarpaulins or plastic sheeting.
- Installation of water sprinkling system or provision hoses or the like.
- Regular watering-down of all loose materials and stockpiles of sand, soil and excavated material.
- Minimisation/relocation of stockpiles of materials, to minimise potential for disturbance by prevailing winds.
- Landscaping and revegetation of disturbed areas.

Traffic

1. Carparking and provision for service vehicles (trucks) shall satisfy Council's Development Control Plan and Sydney Port's Development Guidelines.

2. All vehicles waiting to be loaded/unloaded and queuing of all vehicles shall be accommodated within the site;

3. Prior to the commencement of construction, the applicant shall submit a Construction Traffic Management Plan (CTMP) to the satisfaction of the consent authority and the Councils. The CTMP, incorporating appropriate controls, measures and management practices, shall be implemented to permit construction traffic to only use the state road system to travel to the site. The CTMP must be designed to prevent construction traffic from using surrounding local streets, and all costs of such traffic management shall be borne by the proponent;

4. Randwick City Council shall be closely consulted during the development of the Traffic Management Plan. Council's objectives with respect to the Traffic Management Plan ("TMP") are to:

1. Ensure the safety of the general public, including pedestrians, cyclists and general traffic motorists,
2. Keep traffic delays to a minimum,
3. Maintain satisfactory property access,

4. Minimise disruption to businesses,
5. Minimise disturbance to the environment,
6. Meet the requirements of RMS Traffic management, Road Occupancy Provisions and Traffic Control at Worksites Manual.

5. A detailed traffic control plan shall be developed and implemented to the satisfaction of the consent authority, and the Councils, in accordance with the above criteria, including traffic control measures that prohibit through movements between the subject site and Perry Street (e.g. not to use solid green signals but only to have left / right turn green arrows as part of the intersection traffic signal design) and ensure that traffic from the proposed development shall not enter and exit through local residential streets in both Randwick and Botany Bay Council areas; and the cost of implementation of the traffic control plan shall be borne by the proponent;

6. Randwick City Council shall be consulted and be involved in discussions throughout the detailed design (including development of traffic and civil engineering measures) and construction of the Beauchamp Road/Perry Street intersection upgrade works;

7. The education/enforcement programs shall be implemented in conjunction with associated monitoring/reporting mechanisms, including, but not limited to, the installation of high quality CCTV/surveillance cameras at or near the intersection for ongoing day time and night time monitoring of truck routes/behaviours and a 24 hour telephone line for lodging and handling complaints.

Hazard and Risk

1. All HAZOP methodology and emergency response systems to address any potential loss of containment or similar emergency event shall be reviewed by the NSW Planning & Environment and/or EPA before waste is received at the site.

2. The Incident Response Plan (IRP) and Pollution Incident Management Plan (PIRMP) addressing the specific situations should be incorporated into the Operational Environmental Management Plan (OEMP) which should then be reviewed by the NSW Planning & Environment and/or EPA before any waste is received at the site.

Attachment 2 Randwick City Council Resident Submissions

Council has received five submissions from residents and one submission from the Matraville Precinct Committee during the exhibition period, which have been included below.

Resident Submission 1

From:stevrews [SMTP:stevrews@hotmail.com]
To:General Manager[SMTP:General.Manager@randwick.nsw.gov.au]

Dear sir/madam,

I reside at 9 mccauley st matraville and I would like to strongly reject the proposed waste transfer station on 14 beauchamp rd..its an absolute joke that they would even consider this so close to the residents of this neighborhood. .arent we already putting up with enough, constant vibrations from amcor day and night, trucks 24/7 up and down the street that blatently ignore that rediculous little medium strip u put in to stop them on corner of mccauley and perry st, not to mention biohazards from viola, that we get an emergency escape plan for, shutting Windows etc, and now they are digging up asbestos on corner of perry and mccauley. .are you seriously going to let the ratepayers have to contend with the stench of a dump...we pay our rates the same as everywhere else in randwick, yet you seem to turn a blind eye to this little pocket of your ratepaying residents..its time to say enough is enough, I have contacted you previously about my house constantly shaking from amcor vibrations as well which has done a lot of damage to my house..why do you let these things happen..it is time to get into the 21st century, no other modern city in the world would let our residents 11kms from the city put up with this..crazy..I strongly object to a dump anywhere near my house..please no more, we already contend with to much here..

Steve andrews.

Resident Submission 2

From:Jacinta Attard[SMTP:jacinta.attard@syd.catholic.edu.au]
To:General Manager[SMTP:General.Manager@randwick.nsw.gov.au]

Dear Sirs / Madams

My family and I wish to voice our concern over the proposed Veolia Waste Transfer Station at 14 Beauchamp Road Matraville. Â We are a family who has resided in Matraville for the last fifteen years and have a property located near the proposed site. We understand that areas do need these services to accommodate people's waste. Â However the location for this proposed station is definitely not suitable for our area as we are under enough strain through the many various industries already located in Matraville.

To say the least, the industries already here cause enough disturbance to the local residents, who are already sick and tired of the noise omissions and pollution coming from the Amcor Paper Factory, Orica, Port Botany and not to mention all the other fuel and oil companies within the radius of this proposed site.

We also strongly believe that our road system is under enormous pressure with the continual increase of Truck traffic congesting our local roads and this continuing over a 24 hour period which is non-stop.

As you may be aware, there are still issues which need to be resolved in cleaning up and disposing of toxic waste which is still sitting in the Orica site. Â This issue we believe proves to be a sitting time bomb and needs to be addressed immediately before any further development is approved within the area.

As to the stench and pollution, we already have enough companies within the area which contribute to this issue and also the mismanagement of toxic waste which has seeped into the surrounding lands and as a result have made the land barren and unworthy of using it for any productivity.

I put these question to you: Why should Matraville be the area yet again, as it would seem that there is a spare block of land sitting there - Â to take in everyone's garbage? Whilst all other Councils have closed down their tips, transfer depots and burners, through residential protests over the years, why should the Matraville community shoulder the responsibility for the whole of Sydney?

As residents, we have seen over the years some industries trying to work with the community in cleaning up their past industrial mess. Â Hence Randwick Council, have you not learnt anything from the past with these companies or is it that you simply do not care about what the residents think as this seems to be a case of "one step forward and two steps back," for the people of Matraville.

Therefore, we believe that it is time for Randwick City Council to stop any further development of these types of industries, such as the Waste Transfer Station coming into this area immediately. Â You need to start thinking about the residents of Matraville whose lives are impacted on a daily basis and the risk of further health and environmental issues, such as the contamination of our land, smell and increase of traffic, which in no doubt will only intensify if this proposal is passed.

As a Mother and Father of two small children, we beg you to reconsider this proposal. Â I am sure that there are other suitable sites for this company to build their waste transfer station - but not here in Matraville!!!!!!

We look forward to your reply and hoping that the outcome is in our favour.

Yours Sincerely

Joe and Jacinta Attard

--
Jacinta Attard
Year 1 Classroom Teacher
St Thomas More's Catholic Primary School
Brighton-Le-Sands 2216

Resident Submission 3

From:scott atkins[SMTP:atkins71@optusnet.com]
To:General Manager[SMTP:General.Manager@randwick.nsw.gov.au]

To Randwick Council

I am concerned about this proposed waste transfer station being considered about 350m from my house, the area has already has enough noise and smell from toxic fumes polluting it without councils agreeing to anymore.
The amount of garbage, fumes, noise and extra truck movement everyday this will bring to an already choked up area of Matraville has me bemused how it could even be considered, people live near this proposed site , how do you think summer nights with that smell in your living area would feel or the westerly winds in winter blowing that toxic aroma to all of Matraville not to mention the increased noise levels.
The smell form the waste transfer station at Military rd Matraville already pollutes Matraville, Why would you consider to decimate this area even more.
Im sure you will be receiving plenty of opposition from residents in Matraville and the surrounding areas, please support us

Thankyou
Scott Atkins

Resident Submission 4

From:mpsl[SMTP:mpsl@optusnet.com.au]
To:General Manager[SMTP:General.Manager@randwick.nsw.gov.au]
CCed to Councillors

To whom it may concern

As a resident of McCauley Street in Matraville we would like to lodge our objections to the proposed Banksmeadow Transfer Terminal at 14 Beauchamp Road Matraville.

From all accounts (The Beast, December 10, 2013 - see below) the facility appears to have already been approved with absolutely no regard to the families living in the area:

'Randwick and Waverley will be two of the greenest regions in Sydney when it comes to waste disposal as the local councils and ***residents*** *pave the way with state-of-the-art facilities and innovative ideas.*

Last month, ***Veolia Environmental Services signed a contract with Waverley Council*** *to treat or recycle household waste at a new Banksmeadow facility.*

The plant will be built by 2016*, taking in household waste from five local councils and reducing the amount of waste going to landfill by up to 60 percent.*

Waverley Council believes that the facility will help the area exceed the state government target of a 66 percent reduction in waste diversion from landfill.

Waverley is one of eight councils that signed the joint contract as part of the Southern Sydney Regional Organisation of Councils (SSROC).'

It would appear that the council's only concern would be exceeding the State Governments reduction target.

As Waverley Mayor, Sally Betts states:

*'The contract with Veolia is momentous in helping the council and its **residents** meet targets and improve the environment for future generations.'*

To date, we don't recall being consulted on whether living within 300 metres of a Waste Transfer System would be considered 'momentous'.

It's probably safe to say that Sally Betts doesn't live nearby.

We live in an area full of young families and the threat this facility would pose to the health and well being of everyone living here could definitely be described as momentous:

- Up to **five hundred thousand** tonnes of garbage to be received at the facility per annum
- Over **three hundred** extra trucks in and out of the facility every day travelling on residentail streets
- Increased vibration
- Excessive noise levels
- Excessive and vile odours
- Ongoing dust and pathogens in the air

It's disappointing to think that the councils would consider our suburb as nothing more than a dumping ground for the surrounding council's garbage.

Regards
Sally Penny

Resident Submission 5

From:Ori Almog[SMTP:ori@ask4.me]
To:General Manager[SMTP:General.Manager@randwick.nsw.gov.au]

Dear Madam/Sir,

I would like to express my objection and concerns in regards to the proposed Veolia waste transfer station at 14 Beauchamp Rd, Matraville,

The report presented by Veolia in regards to the above DA was prepared by consultants who were hired to write the report for Veolia and as such, certain expectation existed as to the recommendations and outcome of that report and as such those recommendations should be treated accordingly.

The area in which the proposed site is to be built already suffers from extremely heavy truck traffic due to the recent diversion of heavy vehicles going to Botany Bay away from Bunnerong Rd and into that particular street (Beauchamp Rd).

Adding the tens of thousands of truck going in and out of the new site annually, in a street that part of it has only one lane in each direction due parking cars, will make a bad situation even worse (not to say horrific). With the way trucks drive on that road, running Red lights and speeding, accidents and delays

to traffic will only be a matter of time, not to mention the noise nuisance to neighboring residents such as myself.

On top of that, building a waste site in such close proximity to residential areas, where those areas have been residential prior to the site existence is unheard of in modern cities. This will cause a significant decrease in value of the neighboring properties and will, once more, hurt the local residents. Who in their right mind would choose to live next to such a site?

I would personally like to ask you and the consultants who wrote that report if they were willing to live in such close proximity to the proposed site, having to tolerate odors, noise and heavy traffic on a daily basis ?

I kindly ask that this DA application is to be denied and any plans for a similar site in that location be removed from the agenda.

Kind Regards

Ori Almog

5 Harold St.
Matraville, NSW
2036

Matraville Precinct Committee Submission

Hi Mr General Manager and our local Councillors, Sirs as the Matraville Precinct Chair I am a very passional fellow who always tries to help make things better, I support my local communities and our Randwick City Council, As a local Resident I always fight a clean fight for the right cause to support my neighbours and keep a positive approach to things.

We will be putting forth a submission from the precinct but I hope we get the help from our Randwick City Council to also put in a submission against this development, please look into the effects, the extra traffic of all sorts coming in from Beauchamp Road, all sorts of vehicles traveling through our area, it will generate odour, noise and cause other environmental effects.

The entrance should be in Botany not Matraville if it goes ahead not Matraville. We need our councils help with this. We need our council to protect us. We are already suffering with all sorts of noise issues from the ports. Mr Heneral Manager and Councillors Please look into everything regarding this proposed facility and do what you can to help the residents. We are being smothered with industrial development and the effects on the local residents is intense. Regards, Carlos

Carlos Da Rocha.
Chair Matraville Precinct Committee

Motion from the Matraville Precinct Committee regarding the Veolia Waste Transfer Centre

There is a rising level of community concern about the proposed Veolia Waste Transfer Facility (WTF) at Banksmeadow to operate 24/7. A concern is that even if the facility is enclosed it is likely that high and unacceptable levels of odours

will be released at all times due to the putrescibles as well as non putrescibles wastes to be processed at this facility. The spread of odours will affect the neighbouring businesses, residents, schools as well as local Matraville Town centre. Additionally any trace of odour or waste will attract vermin, Waste Transfer Stations around the world are recognised as sources of other disease vectors such as flies, insects and birds.

The WTF would result in unacceptable health impacts to residents in surrounding streets because of the level of exposure to putrescible waste.

The WTF will add to noise pollution impacts in the region. As it is the community is already experiencing and battling noise emission issues with the 24/7 operations at Port Botany which is expected to increase with the proposed expansion of the port into the future. Noises currently experienced include but are not limited to Beeps, Reverse alarms, Goods train movement and toots.

The WTF will bring in over 840 truck movements per day and this will add to traffic congestion which is already increasing because of growth in Port Botany traffic and potential residential developments proposed for this region under the Government's UAP policy. When this development was first negotiated between SSROC and Veolia the cap at Port Botany was 3.2 million TEU. The PORTS ASSETS (AUTHORISED TRANSACTIONS) BILL 2012 which was enacted in 2013 has since made it illegal to impose a cap at Port Botany and predicted volumes may be as high as 15 million TEU.

The majority of trucks will be traveling east to Banksmeadow where the waste will be transferred onto trains to be hauled west. It would be better to site the Waste Transfer Facility (WTF) further west on the goods line as this would reduce traffic impacts and CO2 emissions.

The Matraville Precinct resolves that for the above reasons, the proposed Veolia Waste Transfer Facility not be built at Banksmeadow because it is not in the public interest.

AUSTRALIAN RAIL TRACK CORPORATION LTD

30 May 2014

Mr Pascal van de Walle
Senior Planning Officer – Major Assessment
NSW Department of Planning
23-33 Bridge Street
Sydney NSW 2000

Dear Mr van de Walle

Re: EIS for Banksmeadow Waster Transfer Station - SSD 5855 Exhibition Comments

In respect of the above EIS that was on display, ARTC offer the following comments:

ITEM 7.2

There appears to be an assumption that the run around of the inbound train will permitted in ARTC's Botany Yard. Our discussions with Pacific National required them to return to the table with a proposal for trains to go straight into their terminal with the departing train only entering Botany Yard when it is ready to depart. No proposal has been provided at this stage.
This needs to be included in an Operations Plan that is acceptable to ARTC.

ITEM 7.3

The fueling and provisioning of locomotive is an issue. Running light engines to another facility ties up capacity of the Port Botany line and needs to be understood. Additionally running fully provisioned locomotives on Port services creates additional shunting and may not align with each of the train services.
This needs to be included in an Operations Plan that is acceptable to ARTC.

ITEM 7.4

There appears to an assumption that someone other than PN or Veolia will pay for the additional track required for their operation. Access Fees do not pay for these types of "upgrades". There has been no commitment by ARTC or indeed the State and Federal governments to fund these and would need to be funded by PN or Veolia.

In summary, the Rail Operator, in this case Pacific National, needs to provide to ARTC an Operations Plan that meets the requirements of its current and future operations (ie addresses the above matters) and does not assume that funding is available for any network upgrades.

Should you have queries in relation to this matter, please do not hesitate to contact me on ph. 8259 0708 or at drogers@artc.com.au

Yours faithfully

Derek Rogers
Property Manager – Sydney Freight Network

21 May 2014

570 George Street
Sydney NSW 2000
All mail to GPO Box 4009
Sydney NSW 2001
T +61 2 131 365
www.ausgrid.com.au

Attention: Pascal van de Walle
NSW Department of Planning and Infrastructure
23-33 Bridge Street,
Sydney NSW 2000

Dear Pascal,

Project Application SSD 13_5855: Banksmeadow Waste Transfer Terminal – 14 Beauchamp Road, Banksmeadow

We refer to the Environmental Impact Statement currently on exhibition for the above project. A review of the project documents has been undertaken in relation to potential impacts or interfaces with Ausgrid's electricity infrastructure.

Ausgrid is concerned with the limited amount of consultation it has received in regards to this proposal. There are a substantial amount of critical electricity assets within the proposed development site including nine important high voltage electricity cables (7x33,000V and 2x132,000V) and twelve joint bays. There are also additional electrical assets on the exterior of the proposed land which could potentially be impacted by the proposed works.

The nine high voltage electricity feeders which traverse the land in question were all installed prior to 2006 and as such Ausgrid will rely on section 53 of the *Electricity Supply Act* (1995) to protect its electrical infrastructure. These feeders are sensitive and vital transmission assets which are used to supply Sydney International Airport as well as Mascot Zone Substation and its surrounding areas. Any form of damage or interruption to these cables would not only have severe consequences to local area power supply but would also potentially be very costly to repair. Given the importance of these cables and the potential consequences if they were to be damaged, Ausgrid believes Veolia should commence consultation with Ausgrid regarding the proposed development as soon as possible with a view to protecting these assets.

The information contained within the reports currently on exhibition does not contain sufficient information for Ausgrid to make an informed review of the project proposal and its potential impacts, therefore Ausgrid requests the following considerations and conditions:

Prior to commencement of works within the development site, the Proponent:

i. must, unless otherwise agreed in writing with Ausgrid, enter into an Agreement to ensure Ausgrid's capacity to design, construct and operate existing and future infrastructure is not impeded, including works affecting easements, conduit corridors, cable routes or works that require the removal or relocation of existing infrastructure;

ii. must confirm with Ausgrid the location and status (e.g. live, de-energised, isolated, abandoned) of existing Ausgrid infrastructure;

iii. must liaise with Ausgrid in relation to any aspects of the development that may impact or potentially impact Ausgrid's infrastructure or ability to safely operate and maintain its infrastructure. This includes but is not limited to minimum clearances,

maintaining access, impacts on cable ratings, structural integrity and ventilation, as well as effects of vibration, excavation and construction works;

iv. must liaise with Ausgrid to determine the relocation of any existing Ausgrid infrastructure to the satisfaction of Ausgrid in its absolute discretion;

v. must liaise with Ausgrid to agree appropriate work methodologies in the vicinity of Ausgrid's infrastructure; and

vi. must comply with relevant network and safety standards as well as the terms of the Agreement.

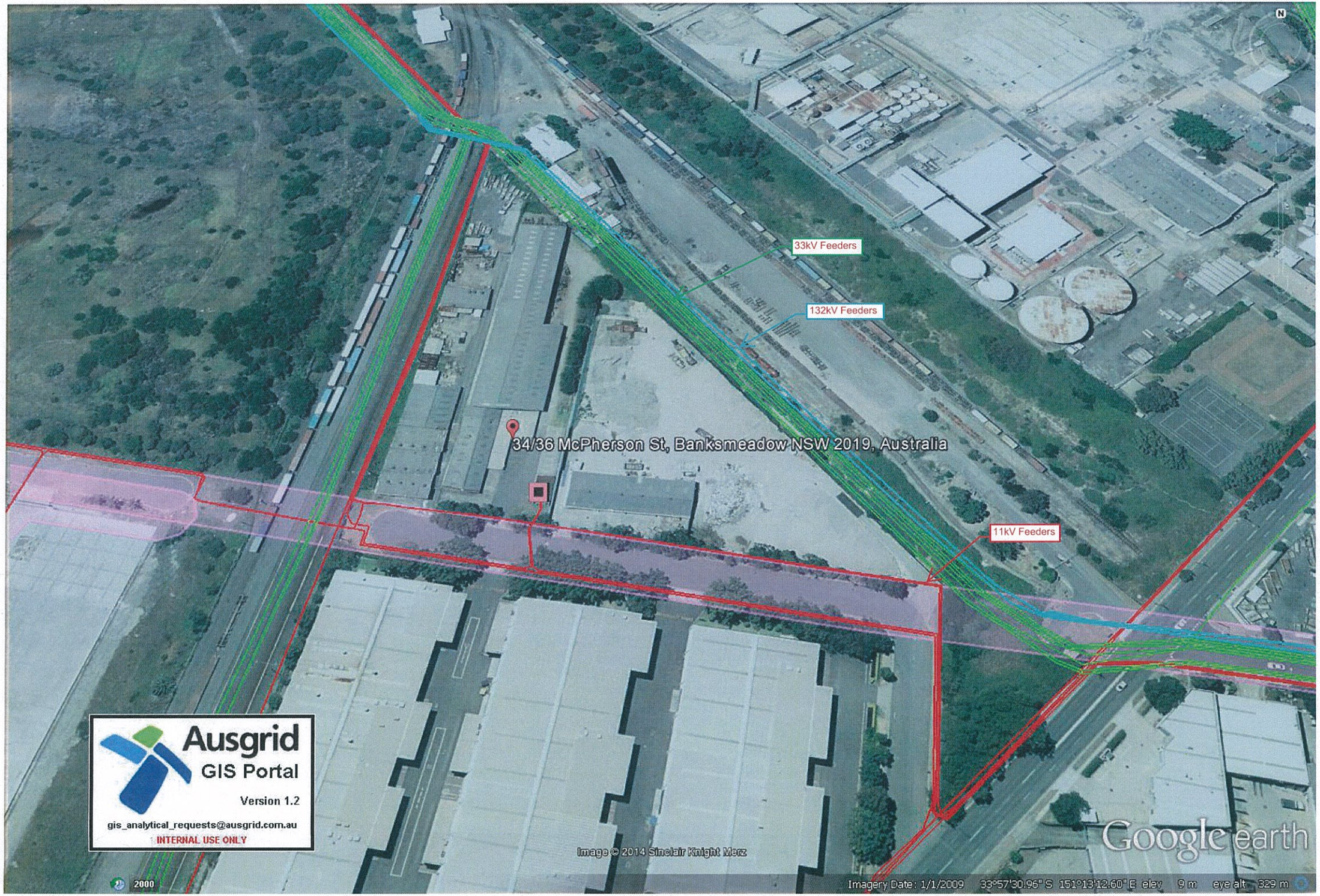
To demonstrate the large volume of electrical assets within the proposed development area we attach a Google earth plan overlayed with details of Ausgrid's electricity feeders for your consideration.

Should you wish to discuss these matters further, please contact Hal Hissey on 9269 2108 or via email hhissey@ausgrid.com.au.

Yours sincerely

Wilma Penrose
Director Area Development, Sydney CBD & East

enc.


33kV Feeders
132kV Feeders
34/36 McPherson St, Banksmeadow NSW 2019, Australia
11kV Feeders
Ausgrid
GIS Portal
Version 1.2
gis_analytical_requests@ausgrid.com.au
INTERNAL USE ONLY
Image © 2014 Sinclair Knight Merz
Google earth
2000
Imagery Date: 1/1/2009 33°57'30.96" S 151°13'12.60" E elev 9 m eye alt 329 m

Pascal Van De Walle

From: Wayne Jones <wayne.jones@dpi.nsw.gov.au>
Sent: Friday, 30 May 2014 3:44 PM
To: Pascal Van De Walle
Subject: Banksmeadow Waste Transfer Terminal (SSD_5855)

Hi Pascal

Please see attached Draft DPI comments on the above project. Formal response should follow shortly.

Regards
Wayne

Wayne Jones | Land Use Planning Coordinating Officer
Department of Primary Industries
Level 48, MLC Centre, 19 Martin Place Sydney NSW 2000
T:02 9338 6708 | E: wayne.jones@dpi.nsw.gov.au

OUT14/15631

Ms Pascal van de Walle
Industry, Key Sites and Social Projects
NSW Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Pascal.vandewalle@planning.nsw.gov.au

Dear Ms van de Walle,

Banksmeadow Waste Transfer Terminal (SSD_5855)
Response to exhibition of Environmental Impact Statement

I refer to your email dated 16 April 2014 requesting advice from the Department of Primary Industries (DPI) in respect to the above matter.

Comment by NSW Office of Water
The NSW Office of Water (Office of Water) has reviewed the Environmental Impact Statement (EIS) and provides general comments at Attachment A.

An authorisation for the take of groundwater as part of the anticipated dewatering of the site is required. As such, standard Conditions of Approval likely to be applied to a Part 5 licence authorising temporary dewatering are provided for information at Attachment B.

For further information please contact Janne Grose, Planning and Assessment Coordinator (Penrith office) on 4729 8262 or at janne.grose@water.nsw.gov.au.

Comment by Agriculture NSW
Agriculture NSW advise that the applicant will need to ensure that the NSW Department of Primary Industries Permit OUT13/13188 for the movement of solid waste from the Sydney Phylloxera Infested Zone into Woodlawn Bioreactor within the NSW Phylloxera Exclusion Zone for deep burial or composting for mine rehabilitation is still valid for the expanded operation.

Please contact Satendra Kumar 02 6391 3553, satendra.kumar@dpi.nsw.gov.au to confirm the status of the permit.

Attachment A

Banksmeadow Waste Transfer Terminal (SSD_5855)
Response to exhibition of EIS
Comments by NSW Office of Water

Groundwater

The EIS notes excavations on the site would be limited to removal of the underground petroleum storage system (UPSS) and excavations for building footings (page 121). It indicates that while groundwater is likely to be encountered during construction works, impacts to groundwater would be of short duration (page 59) and only minor impacts on the groundwater level are predicted during construction due to temporary dewatering activities (page 148).

Licensing and quantification of expected inflows
The EIS notes an aquifer interference approval and a water access licence would be obtained prior to commencement of construction works (page 75).

Currently, temporary construction dewatering activities remain licensable under the *Water Act 1912* and a licence for temporary construction dewatering activities will be required under Part 5 of the *Water Act 1912.*

A key requirement of the licence application will be to provide a clear prediction of the total volumes of groundwater likely to be dewatered, as well as detailed justification and explanation of methodologies to support that prediction.

Under the circumstances described in the EIS, the Office of Water is unlikely to support any proposal that requires permanent or semi-permanent pumping/extraction of the groundwater. Therefore the proposal should ensure that adequate construction methods will be used to permanently seal any subsurface voids.

If permanent or semi-permanent extraction of groundwater is unavoidable, the proponent must obtain a water access licence to cover the volume of ongoing take of groundwater.

Groundwater Management Plan
The Remediation Action Plan for the Keith Engineering Land (Appendix E) indicates the validation consultant will prepare a Groundwater Management Plan (GWMP) if required (page 53). The Office of Water requests that it has the opportunity to review and comment on the GWMP, particularly if any ongoing or new groundwater issues are identified.

Site Environmental Management Plan
The EIS notes a Site Environmental Management Plan (SEMP) would be developed as an operational mitigation measure for the Keith Engineering land which forms part of the site. The SEMP would specify measures for on-going management of soil and groundwater contamination (pages 130 and 306). The Office of Water requests it has the opportunity to review and comment on the SEMP.

Groundwater Dependent Ecosystems

The EIS notes a review of the Atlas of GDEs showed there are no GDEs hydraulically down-gradient of the proposal (see Section 8.2.2, page 140). However, Section 8.10.2 of the EIS notes Coastal Flats Swamp Mahogany Forest occurs approximately 50 m west of the site (see page 245 and figure 8-44). According to the Department of Primary Industries Risk Assessment Guidelines for Groundwater Dependent Ecosystems (2012), Volume 3, Appendix 9, Coastal Flats Swamp Mahogany Forest is a “high probability groundwater dependent wetland community”.

The remnant community appears to be located on the eastern side of the Orica Southlands site (see Figures 4-15 and 8-44). The EIS notes the Orica Southlands site is to be subdivided to become a major industrial and warehousing estate. It is unclear in the EIA documents whether the remnant Coastal Flats Swamp Mahogany Forest is located hydraulically down-gradient of the project site, or if the remnant is proposed to be retained and protected on the Southlands site. Clarification is required on this.

If the remnant Coastal Flats Swamp Mahogany Forest is to be retained, it is suggested that additional consideration is given to the potential impact of the project on this nearby high probability groundwater dependent wetland community, particularly as the Asciano Land – Phase 2 site Investigation Report indicates groundwater is flowing in a south west direction.

End Attachment A

Attachment B

Banksmeadow Waste Transfer Terminal (SSD_5855)
Response to exhibition of EIS – NSW Office of Water
Recommended Conditions of Approval for Construction Dewatering

These terms do not represent any form of authorisation for the extraction of groundwater

General

1. An authorisation shall be obtained from NSW Office of Water for the take of groundwater as part of the activity. Groundwater shall not be pumped or extracted for any purpose other than temporary construction dewatering at the site identified in the development application. The authorisation shall be subject to a currency period of 12 months from the date of issue and will be limited to the volume of groundwater take identified in the authorisation.

2. The design and construction of the building must prevent any take of groundwater after the authorisation has lapsed by making any below-ground levels that may be in contact with groundwater watertight for the anticipated life of the building. Waterproofing of below-ground levels must be sufficiently extensive to incorporate adequate provision for reasonably foreseeable high water table elevations to prevent potential future inundation.

3. Construction methods and material used in and for construction shall be designed to account for the likely range of salinity and pollutants which may be dissolved in groundwater, and shall not themselves cause pollution of the groundwater.

Prior to excavation

4. Measurements of groundwater levels beneath the site from a minimum of three monitoring bores shall be taken. These measurements should be included in a report provided to the NSW Office of Water in support of the dewatering licence application, along with a schedule and indicative level predictions for the proposed ongoing water level monitoring from the date of consent until at least two months after the cessation of pumping shall be included in the report.

5. A reasonable estimate of the total volume of groundwater to be extracted shall be calculated and a report provided to the NSW Office of Water. Details of the parameters (e.g. permeability predicted by slug-testing, pump-testing or other means) and calculation method shall be included in the report submitted to the NSW Office of Water in support of the dewatering licence.

6. A copy of a valid development consent for the project shall be provided in the report to the NSW Office of Water.

7. Groundwater quality testing shall be conducted on a suitable number of samples using a suitable suite of analytes and completed by a NATA-certified laboratory, with the results collated and certificates appended to a report supplied to the NSW Office of Water. Samples must be taken prior to the substantial commencement of dewatering, and a schedule of the ongoing testing throughout the dewatering activity shall be included in the report. Collection and testing and interpretation of results must be done by suitably qualified persons and NATA certified laboratory identifying the presence of any contaminants and comparison of the data against accepted water quality objectives or criteria.

8. The method of disposal of pumped water shall be nominated (i.e. reinjection, drainage to the stormwater system or discharge to sewer) and a copy of the written permission from the relevant controlling authority shall be provided to the NSW Office of Water. The disposal of any contaminated pumped groundwater (sometimes referred to as “tailwater”) must comply with the provisions of the *Protection of the Environment Operations Act 1997* and any requirements of the relevant controlling authority.

9. Contaminated groundwater (i.e. above appropriate NEPM 2013 investigation thresholds) shall not be reinjected into any aquifer without the specific authorisation of the NSW Environment Protection Authority (any such discharge would be regulated through a licence issued under the Protection of the Environment Operations Act 1997 [POEO Act]). The reinjection system design and treatment methods to remove contaminants shall be nominated and a report provided to the NSW Office of Water. The quality of any pumped water that is to be reinjected must be compatible with, or improve the intrinsic or ambient groundwater in the vicinity of the reinjection site.

During excavation

10. Engineering measures designed to transfer groundwater around the basement shall be incorporated into the basement construction to prevent the completed infrastructure from restricting pre-existing groundwater flows.

11. Piping, piling or other structures used in the management of pumped groundwater shall not create a flooding hazard. Control of pumped groundwater is to be maintained at all times during dewatering to prevent unregulated off-site discharge.

12. Measurement and monitoring arrangements to the satisfaction of the NSW Office of Water are to be implemented. Monthly records of the volumes of all groundwater pumped and the quality of any water discharged are to be kept and a report provided to the NSW Office of Water after dewatering has ceased. Daily records of groundwater levels are to be kept and a report provided to the NSW Office of Water after dewatering has ceased.

13. Pumped groundwater shall not be allowed to discharge off-site (e.g. adjoining roads, stormwater system, sewerage system, etc) without the controlling authorities approval and/or owners consent. The pH of discharge water shall be managed to be between 6.5 and 8.5. The requirements of any other approval for the discharge of pumped groundwater shall be complied with.

14. Dewatering shall be undertaken in accordance with groundwater-related management plans applicable to the excavation site. The requirements of any management plan (such as acid sulfate soils management plan or remediation action plan) shall not be compromised by the dewatering activity.

15. The location and construction of groundwater extraction works that are abandoned are to be recorded and a report provided to the NSW Office of Water after dewatering has ceased. The method of abandonment is to be identified in the documentation.

16. Access to groundwater management works used in the activity is to be provided to permit inspection when required by the NSW Office of Water under appropriate safety procedures.

Following excavation

17. All monitoring records must be provided to the NSW Office of Water after the required monitoring period has ended together with a detailed interpreted hydrogeological report identifying all actual resource and third party impacts.

End Attachment B

Regards
Wayne

Wayne Jones | Land Use Planning Coordinating Officer
Department of Primary Industries
Level 48, MLC Centre, 19 Martin Place Sydney NSW 2000
T:02 9338 6708 | E: wayne.jones@dpi.nsw.gov.au

Pascal Van De Walle

From: Marnie Stewart <Marnie.Stewart@environment.nsw.gov.au>
Sent: Thursday, 22 May 2014 11:01 AM
To: Pascal Van De Walle
Subject: SSD 5855 Banksmeadow Waste Transfer Terminal

Hi Pascal

Please be advised that OEH will not be providing any comments on SSD 5855 Banksmeadow Waste Transfer Terminal.

Regards,

Marnie Stewart
Senior Regional Operations Officer
Regional Operations
Office of Environment and Heritage
NSW Department of Premier and Cabinet
T: 02 9995 6868
F: 02 9995 6900
W: www.environment.nsw.gov.au
Please note my work days are Tues, Wed and Thurs

PCU53029

Sydney WATER

5 May 2014

Attention: Pascal van de Walle
Nick Hall
A/Team Leader – Industry, Key Sites & Social Projects
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Re: Banksmeadow Waste Transfer Terminal (SSD 5855)

Dear Mr Hall,

Thank you for your letter notifying Sydney Water of the proposed development referenced above. We have reviewed the application and provide the following comments for your consideration.

Water

- The drinking water main available for connection is the 100mm main in McPherson Street
- Detailed requirements will be provided at the Section 73 application phase.

Wastewater

- The wastewater main available for connection is the 150 mm main constructed under WO 52107
- Detailed requirements will be provided at the Section 73 application phase.

Sydney Water E-Planning
Sydney Water has an email address for planning authorities submit statutory or strategic planning documents for review. This email address is urbangrowth@sydneywater.com.au. The use of this email will help Sydney Water provide advice on planning projects faster, in line with current planning reforms.

Further advice and requirements for this proposal are at attachment 1. If you require any further information, please contact Jordan Faeghi of the Urban Growth Branch on 02 8849 4649 or e-mail jordan.faeghi@sydneywater.com.au.

Yours sincerely,

Emma Whale
A/Manager, Growth Strategy

Attachment 1

Sydney Water Servicing
A Section 73 Compliance Certificate under the Sydney Water Act 1994 must be obtained from Sydney Water.

Make an early application for the certificate, as there may be water and wastewater pipes to be built that can take some time. This can also impact on other services and buildings, driveways or landscape designs.

Applications must be made through an authorised Water Servicing Coordinator. For help either visit www.sydneywater.com.au > Plumbing, building and developing > Developing > Land development or telephone 13 20 92. .

Requirements for Business Customers for Commercial and Industrial Property Developments

If this property is to be developed for Industrial or Commercial operations, it may need to meet the following requirements:

Trade Wastewater Requirements

If this development is going to generate trade wastewater, the property owner must submit an application requesting permission to discharge trade wastewater to Sydney Water's sewerage system. You must wait for approval of this permit before any business activities can commence.

The permit application should be emailed to Sydney Water's Business Customer Services at businesscustomers@sydneywater.com.au

It is illegal to discharge Trade Wastewater into the Sydney Water sewerage system without permission.

A **Boundary Trap** is required for all developments that discharge trade wastewater where arrestors and special units are installed for trade wastewater pre-treatment.

If the property development is for Industrial operations, the wastewater may discharge into a sewerage area that is subject to wastewater reuse. Find out from Business Customer Services if this is applicable to your development.

Backflow Prevention Requirements

Backflow is when there is unintentional flow of water in the wrong direction from a potentially polluted source into the drinking water supply.

All properties connected to Sydney Water's supply must install a testable **Backflow Prevention Containment Device** appropriate to the property's hazard rating. Property with a high or medium hazard rating must have the backflow prevention containment device tested annually. Properties identified as having a low hazard rating must install a non-testable device, as a minimum.

Separate hydrant and sprinkler fire services on non-residential properties, require the installation of a testable double check detector assembly. The device is to be located at the boundary of the property.

Before you install a backflow prevention device:

1. Get your hydraulic consultant or plumber to check the available water pressure versus the property's required pressure and flow requirements.
2. Conduct a site assessment to confirm the hazard rating of the property and its services. Contact PIAS at NSW Fair Trading on **1300 889 099**.

For installation you will need to engage a licensed plumber with backflow accreditation who can be found on the Sydney Water website: http://www.sydneywater.com.au/Plumbing/BackflowPrevention/

Water Efficiency Recommendations

Water is our most precious resource and every customer can play a role in its conservation. By working together with Sydney Water, business customers are able

to reduce their water consumption. This will help your business save money, improve productivity and protect the environment.

Some water efficiency measures that can be easily implemented in your business are:

- Install water efficiency fixtures to help increase your water efficiency, refer to WELS (Water Efficiency Labelling and Standards (WELS) Scheme, http://www.waterrating.gov.au/
- Consider installing rainwater tanks to capture rainwater runoff, and reusing it, where cost effective. Refer to http://www.sydneywater.com.au/Water4Life/InYourBusiness/RWTCalculator.cfm
- Install water-monitoring devices on your meter to identify water usage patterns and leaks.
- Develop a water efficiency plan for your business.

It is cheaper to install water efficiency appliances while you are developing than retrofitting them later.

Contingency Plan Recommendations

Under Sydney Water's **customer contract** Sydney Water aims to provide Business Customers with a continuous supply of clean water at a minimum pressure of 15meters head at the main tap. This is equivalent to 146.8kpa or 21.29psi to meet reasonable business usage needs.

Sometimes Sydney Water may need to interrupt, postpone or limit the supply of water services to your property for maintenance or other reasons. These interruptions can be planned or unplanned.

Water supply is critical to some businesses and Sydney Water will treat vulnerable customers, such as hospitals, as a high priority.

Have you thought about a **contingency plan** for your business? Your Business Customer Representative will help you to develop a plan that is tailored to your business and minimises productivity losses in the event of a water service disruption.

For further information please visit the Sydney Water website at: http://www.sydneywater.com.au/OurSystemsandOperations/TradeWaste/ or contact Business Customer Services on **1300 985 227** or businesscustomers@sydneywater.com.au

SSROC
SOUTHERN SYDNEY REGIONAL ORGANISATION OF COUNCILS

28 May 2014

The Hon Pru Goward MP
Minister for Planning

On line submission: www.planning.nsw.gov.au

Dear Ms Goward,

Re: SSD 5855 - Banksmeadow Waste Transfer Terminal

Southern Sydney Regional Organisation of Councils (SSROC) is an association of sixteen Councils formed for their mutual benefit. Collectively, the group extends across an area covering almost 700 square kilometres, with a population in excess of 1.6 million people. The role of SSROC is to undertake projects that cross council boundaries achieving results that will contribute to the sustainability of our member Councils and their communities. In this role we have supported eight Councils through an open tender process to significantly improve the diversion of their communities' general waste from landfill, in support of the NSW Government's Waste and Resource Recovery (WARR) Strategy.

The extensive process, which began in 2008, identified the best offer across a wide range of criteria was that of Veolia Environmental Services (Veolia). It included the development of a new waste transfer terminal in Banksmeadow. SSROC therefore strongly supports the development. The proposed transfer terminal at Banksmeadow is a critical element in moving towards this improved service and enabling Council and its seven partner Councils to contribute to the NSW Government targets (NSW 2021, goals 23, 19, 20, 5 and 3) as well as its 70% recycling target from the draft WARR Strategy 2013-21. The new facility is an essential element in the management of waste in the southern Sydney area, and a key component in the solution developed by the eight Councils with Veolia.

The proposed site is within the City of Botany Bay local government area, in the region covered by SSROC. It is adjacent to the Port Botany railway line, zoned as General Industrial within the State Environmental Planning Policy (Port Botany & Port Kembla) 2013. No waste will be processed or disposed of

Lvl 2, Suite 2E, Hurstville House
34 MacMahon Street
Hurstville

PO Box 536
Hurstville NSW 1481

Ph: 9330 6455
Fx: 9330 6456
Email: ssroc@ssroc.nsw.gov.au
Web: www.ssroc.nsw.gov.au

at Banksmeadow: it will be purely a transfer facility. Indeed, the site will be improved and any contamination left by previous site occupants will be managed appropriately.

More broadly, the proposed facility will provide Local Councils and business with a much-needed choice in determining their future waste management options. It will have the capacity to receive up to 400,000 tonnes of putrescible waste per year for transfer by rail, and up to 100,000 tonnes per year of non-putrescible waste for transfer to a proposed recycling facility in Camellia.

In summary, the Banksmeadow development is critical to the efforts of southern Sydney Councils to dramatically improve waste management in support of the government's targets. SSROC fully supports the application by Veolia to develop a transfer station at Banksmeadow.

Yours sincerely,

Alan Northey
General Manager
Southern Sydney Regional Organisation of Councils

City of Canterbury

City of Cultural Diversity

Our Reference: P-84-3

Enquiries: Les Andrews
Direct Phone: 97899371
Direct Fax:

The Hon. Rob Stokes, MP
Level 32 Governor Macquarie Tower
1 Farrer Place
SYDNEY NSW 2000

Dear Minister

Re: SSD 5855 - Banksmeadow Waste Transfer Terminal

The City of Canterbury supports the proposal by Veolia Environmental Services (Veolia) to develop a new waste transfer terminal in Banksmeadow.

Council understands that the proposed development is expected to:

- Reduce truck movements on Sydney's roads by establishing an eastern suburbs transfer terminal and moving the compacted waste by train.
- Reduce putrescible waste to landfill by over 54,000 tonnes.
- Help to create up to 36 new jobs at the transfer terminal and at the Woodlawn facility.
- Help to rehabilitate the former Woodlawn mine site.

It is understood that the proposed site is within the City of Botany Bay local government area, within the southern Sydney region, potentially more easily accessible to the eastern suburbs than any other existing waste transfer facility. It is adjacent to the Port Botany railway line, zoned as General Industrial within the State Environmental Planning Policy (Port Botany & Port Kembla) 2013. No waste will be processed or disposed of at Banksmeadow: it will be purely a transfer facility. Indeed, the site will be improved and any contamination left by previous site occupants will be managed appropriately.

With the capacity to receive up to 400,000 tonnes of putrescible waste per year for transfer by rail, and up to 100,000 tonnes per year of non-putrescible waste for transfer to a proposed recycling facility in Camellia, the proposed development will improve the infrastructure required for the effective and efficient delivery of waste and resource recovery services.

Council therefore considers that the proposed facility will provide Local Councils and businesses with a much-needed choice in determining their future waste management options. Waste and resource recovery are essential services, being fundamental to public health and hygiene both generally and in emergency situations such as floods and fires.

Such infrastructure is essential if Councils and the NSW Government are to meet the targets under NSW 2021 and the NSW WARR Strategy. The Banksmeadow development represents a welcome and much needed component in Sydney's waste and resource recovery infrastructure.

Should you require further information, please contact Les Andrews – Manager Waste and Cleaning Services on (02) 9789 9371.

Yours sincerely

Jim Montague PSM
GENERAL MANAGER

28 May 2014

City of Canterbury

City of Cultural Diversity

Our Reference:

Enquiries: Les Andrews
Direct Phone: 97899371

The Hon. Pru Goward, MP
Level 34 Governor Macquarie Tower
1 Farrer Place
SYDNEY NSW 2000

Dear Minister

Re: SSD 5855 - Banksmeadow Waste Transfer Terminal

The City of Canterbury supports the proposal by Veolia Environmental Services (Veolia) to develop a new waste transfer terminal in Banksmeadow.

Council understands that the proposed development is expected to:

- Reduce truck movements on Sydney's roads by establishing an eastern suburbs transfer terminal and moving the compacted waste by train.
- Reduce putrescible waste to landfill by over 54,000 tonnes.
- Help to create up to 36 new jobs at the transfer terminal and at the Woodlawn facility.
- Help to rehabilitate the former Woodlawn mine site.

It is understood that the proposed site is within the City of Botany Bay local government area, within the southern Sydney region, potentially more easily accessible to the eastern suburbs than any other existing waste transfer facility. It is adjacent to the Port Botany railway line, zoned as General Industrial within the State Environmental Planning Policy (Port Botany & Port Kembla) 2013. No waste will be processed or disposed of at Banksmeadow: it will be purely a transfer facility. Indeed, the site will be improved and any contamination left by previous site occupants will be managed appropriately.

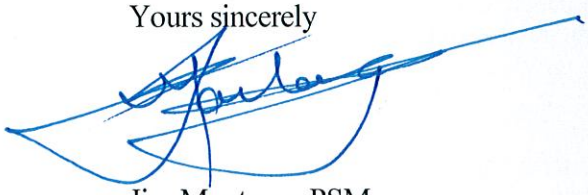
With the capacity to receive up to 400,000 tonnes of putrescible waste per year for transfer by rail, and up to 100,000 tonnes per year of non-putrescible waste for transfer to a proposed recycling facility in Camellia, the proposed development will improve the infrastructure required for the effective and efficient delivery of waste and resource recovery services.

Council therefore considers that the proposed facility will provide Local Councils and businesses with a much-needed choice in determining their future waste management options. Waste and resource recovery are essential services, being fundamental to public health and hygiene both generally and in emergency situations such as floods and fires.

Such infrastructure is essential if Councils and the NSW Government are to meet the targets under NSW 2021 and the NSW WARR Strategy. The Banksmeadow development represents a welcome and much needed component in Sydney's waste and resource recovery infrastructure.

Should you require further information, please contact Les Andrews – Manager Waste and Cleaning Services on (02) 9789 9371.

Yours sincerely



Jim Montague PSM
GENERAL MANAGER

28 May 2014

Ashfield Council

Contact: Vanessa Chan
Phone: 9716 1901

20 May 2014

The Hon Pru Goward
Minister for Planning, and Minister for Women
Level 34
Governor Macquarie Tower
1 Farrer Place
SYDNEY NSW 2000

Dear Minister

Re: SSD 5855 - Banksmeadow Waste Transfer Terminal

Ashfield Council supports the proposal by Veolia Environmental Services (Veolia) to develop a new waste transfer terminal in Banksmeadow.

Ashfield Council is one of eight in the southern Sydney area to have entered into an agreement with Veolia for a new service, which includes using the proposed new Banksmeadow transfer terminal. Some of the Councils will deliver their collected general waste to the transfer station, where it will be compacted and transferred to containers for transport by rail to a new processing facility at Woodlawn (near Goulburn).

The eight Councils participating in this project are very excited at the prospect of:

- Reducing truck movements on Sydney's roads by establishing an eastern suburbs transfer terminal and moving the compacted waste by train.
- Reducing putrescible waste to landfill by over 54,000 tonnes.
- Helping to create up to 36 new jobs at the transfer terminal and at the Woodlawn facility.
- Helping to rehabilitate the former Woodlawn mine site.

The proposed transfer terminal at Banksmeadow is a critical element in moving towards this improved service and enabling Council and its seven partner Councils to contribute to the NSW Government targets (NSW 2021, goals 23, 19, 20, 5 and 3) as well as its 70% recycling target from the draft Waste Avoidance and Resource Recovery (WARR) Strategy 2013-21. The new facility is an essential element in the management of waste in the southern Sydney area, and a key component in the solution developed by the eight Councils with Veolia.

Ashfield Council

The proposed site is within the City of Botany Bay local government area, in the region covered by SSROC. It is adjacent to the Port Botany railway line, zoned as General Industrial within the State Environmental Planning Policy (Port Botany & Port Kembla) 2013. No waste will be processed or disposed of at Banksmeadow: it will be purely a transfer facility. Indeed, the site will be improved and any contamination left by previous site occupants will be managed appropriately.

More broadly, the proposed facility will provide Local Councils and business with a much-needed choice in determining their future waste management options. It will have the capacity to receive up to 400,000 tonnes of putrescible waste per year for transfer by rail, and up to 100,000 tonnes per year of non-putrescible waste for transfer to a proposed recycling facility in Camellia.

In summary, the Banksmeadow development is critical to Council's efforts to dramatically improve waste management in support of the government's targets under NSW 2021 and the NSW WARR Strategy. It has the potential to provide NSW with many other benefits, the development is rightly deemed to be State significant.

Yours faithfully

Vanessa Chan
General Manager

260 Liverpool Road Ashfield NSW 2131
PO Box 1145 Ashfield NSW 1800
DX 21221 Ashfield
ABN 11211068961
Tel (02) 9716 1800
Fax (02) 9716 1911
info@ashfield.nsw.gov.au
www.ashfield.nsw.gov.au

Councillor John Faker
Burwood Mayor
Working for Our Community

Burwood Council
Office of the Mayor

The Hon Pru Goward MP
Minister for Planning
L34, Governor Macquarie Tower
1 Farrer Place
SYDNEY NSW 2000

Trim No: 14/22421

Dear Minister

SSD 5855 - BANKSMEADOW WASTE TRANSFER TERMINAL

Burwood Council supports the proposal by Veolia Environmental Services (Veolia) to develop a new waste transfer terminal in Banksmeadow.

Burwood Council is one of eight Councils in the Southern Sydney area to have entered into an agreement with Veolia for a new service, which includes using the proposed new Banksmeadow transfer terminal. Some of the Councils will deliver their collected general waste to the transfer station, where it will be compacted and transferred to containers for transport by rail to a new processing facility at Woodlawn (near Goulburn).

The eight Councils participating in this project are very excited at the prospect of:

- Reducing truck movements on Sydney's roads by establishing an eastern suburbs transfer terminal and moving the compacted waste by train.
- Reducing putrescible waste to landfill by over 54,000 tonnes.
- Helping to create up to 36 new jobs at the transfer terminal and at the Woodlawn facility.
- Helping to rehabilitate the former Woodlawn mine site.

The proposed transfer terminal at Banksmeadow is a critical element in moving towards this improved service and enabling Council and, its seven partner Councils, to contribute to the NSW Government targets (NSW 2021, goals 23, 19, 20, 5 and 3), as well as its 70% recycling target from the draft Waste Avoidance and Resource Recovery (WARR) Strategy 2013-21. The new facility is an essential element in the management of waste in the Southern Sydney area and a key component in the solution developed by the eight Councils with Veolia.

The proposed site is within the City of Botany Bay Local Government Area, in the region covered by Southern Sydney Regional Organisation of Councils (SSROC). It is adjacent to the Port Botany railway line, zoned as General Industrial within the State Environmental Planning Policy (Port Botany & Port Kembla) 2013. No waste will be processed or disposed of at Banksmeadow: it will be purely a transfer facility. Indeed, the site will be improved and any contamination left by previous site occupants will be managed appropriately.

Suite 1, Level 2, 1-17 Elsie Street, Burwood NSW 2134 | P.O. Box 240 Burwood NSW 1805
Phone: 02 9911 9916 | **Facsimile:** 02 9911 9988 | **Email:** mayor@burwood.nsw.gov.au

More broadly, the proposed facility will provide Local Councils and business with a much-needed choice in determining their future waste management options. It will have the capacity to receive up to 400,000 tonnes of putrescible waste per year for transfer by rail, and up to 100,000 tonnes per year of non-putrescible waste for transfer to a proposed recycling facility in Camellia.

In summary, the Banksmeadow development is critical to Council's efforts to dramatically improve waste management in support of the Government's targets under NSW 2021 and the NSW WARR Strategy. It has the potential to provide NSW with many other benefits and the development is rightly deemed to be State significant.

If you need to discuss this further, please contact me on 9911 9916.

Yours sincerely

CR JOHN FAKER
Mayor of Burwood