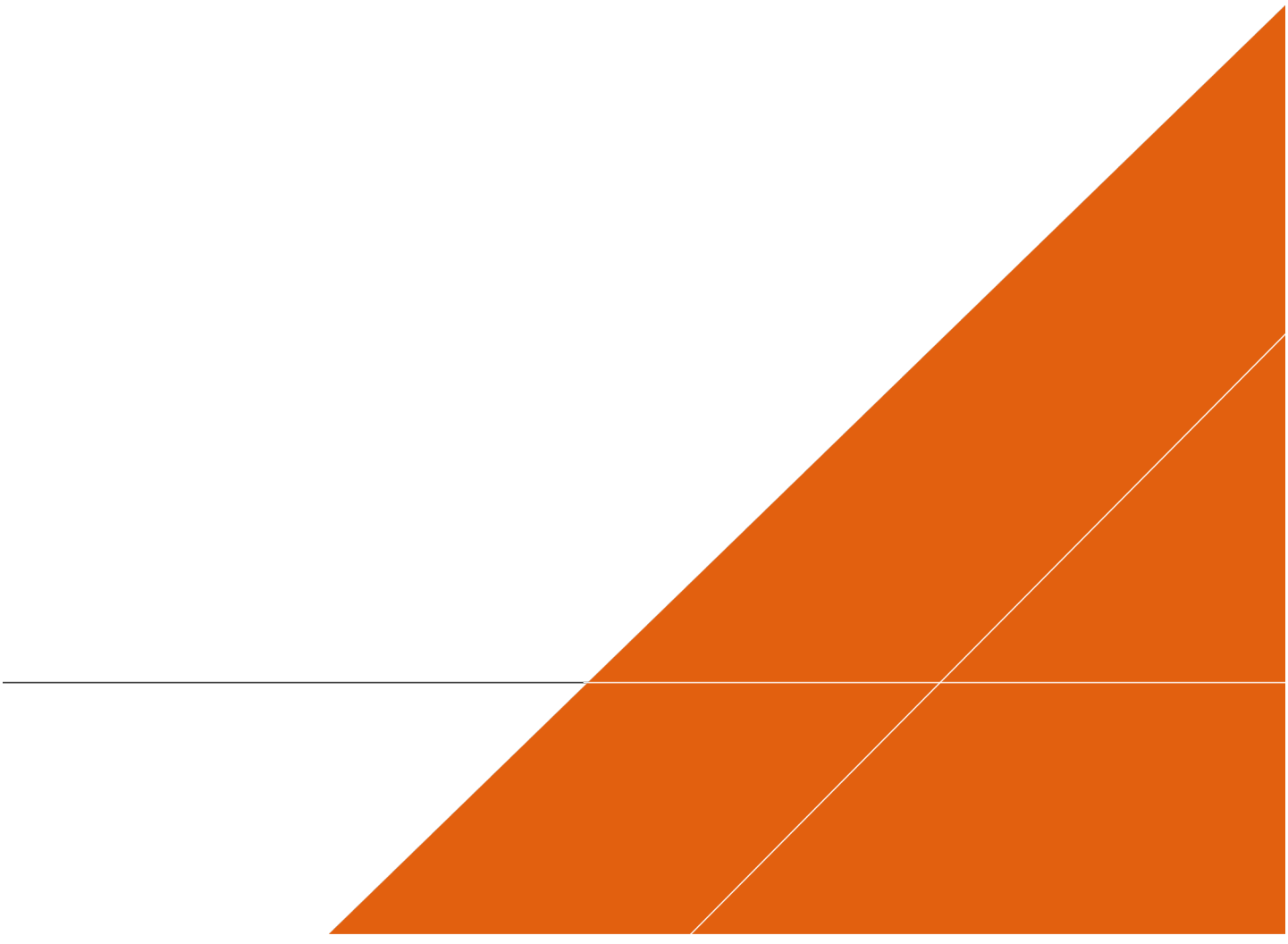
ARCADIS Design & Consultancy for natural and built assets

KINGS PARK METAL RECOVERY AND RECYCLING FACILITY EXPANSION

23-43 and 45 Tattersall Road, Kings Park - Sell & Parker Pty Ltd

Response to Submissions

02 AUGUST 2021



CONTACT

SEAN FISHWICK
Senior Environmental Consultant

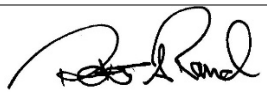
T 02 8907 2689
E sean.fishwick@arcadis.com

Arcadis
Level 16, 580 George Street
Sydney NSW 2000

SELL & PARKER PTY LTD
KINGS PARK METAL RECOVERY AND RECYCLING FACILITY EXPANSION

Response to Submissions

SSD-10396

Author	Sean Fishwick, Francisco Medina, Kristen Branks, Matt Filmer	
Checker	Sean Fishwick	
Approver	Peter Rand	
Report No	01	
Date	2/08/2021	

CONTENTS

APPENDICES

GLOSSARY

Term	Definition
AEP	Annual Exceedance Probability
The Applicant	The entity seeking approval, namely Sell & Parker Pty Ltd
AQMP	Air Quality Management Plan
AQMS	Air Quality Monitoring Stations
ARI	Average recurrence interval
AWS	Automatic Weather Stations
BDAR	Biodiversity Development Assessment Report
DCP	*Development Control Plan 2015*
Blacktown LEP	*Blacktown Local Environmental Plan 2015*
Blacktown LSPS	*Blacktown Local Strategic Planning Statement 2020*
Council	Blacktown City Council
dB	decibels
DPIE	NSW Department of Planning, Industry and Environment
DP	Deposited Plan
DPI	Department of Primary Industries
ECS	Emissions Control System
EES	Environment, Energy and Science Group
EIS	Environmental Impact Statement
EP&A Act	*Environmental Planning and Assessment Act 1979*
EP&A Regs	*Environmental Planning and Assessment Regulation 2000*
EPA	Environment Protection Authority
EPI	Environmental Planning Instrument
EPL	Environment Protection Licence
ERP	Emergency Response Plan
ESIP	Emergency Services Information Package
FRNSW	Fire and Rescue NSW
GHG	Greenhouse Gas
ha	Hectares
IPC	Independent Planning Commission
kL	Kilolitres
L	Litres
LEP	Local Environmental Plan
LGA	Local Government Area
Lidar	Light detection and ranging
LoS	Level of service
LSPS	Local Strategic Planning Statement

Term	Definition
m	Metres
MOD / MODs	Modification(s)
Modification 1 (MOD 1)	The approved modifications to the Original Approval dated 6 July 2017
Modification 2 (MOD 2)	The approved modifications to the Original Approval and approved MOD 1 dated 26 February 2018
Modification 3 (MOD 3)	The approved modifications to the Original Approval and approved MOD 2 dated 29 May 2019
NCA	Noise catchment area
MUSIC Model	Model for Urban Stormwater Improvement Conceptualisation
Operational use batteries	Full batteries for daily operational use or stored on site
NMP	Noise Management Plan
Northstar	Northstar Air Quality Pty Ltd
NPfI	*Noise Policy for Industry 2017*
OEMP	Operational Environmental Management Plan
The Original Approval	The approved Environmental Impact Assessment for SSD-5041
Pick 'N' Payless	Pick 'N' Payless Metal Recovery and Recycling Facility located at located at 57 Tattersall Road
PHA	Preliminary Hazard Analysis
PIRMP	Pollution Incident Response Management Plan
PMF	Probable Maximum Flood
POEO Act	*Protection of the Environment Operations Act 1997*
The Proposal	The project for which approval is being sought, namely the expansion of Kings Park metal recycling and processing facility
The Proposal Site	The Sell & Parker Premises at 23-43 and 45 Tattersall Road, Kings Park NSW. The area at which the Proposal would be located incorporates the following lots: Lot 2, DP 550522 Lot 5, DP 7086
RBLs	Rating background levels
Renzo Tonin	Renzo Tonin & Associates
Roads and Maritime	Roads and Maritime Services
Roads Act	*Roads Act 1993*
RRF	Resource Recovery Facility
RtS	Response to submissions
SDS	Safety Data Sheet
SEARs	Secretary's Environmental Assessment Requirements
Sell & Parker	Sell & Parker Pty Ltd
SEPP 33	*State Environmental Planning Policy No. 33 – Hazardous and Offensive Development*
SEPPs	State Environmental Planning Policies

Term	Definition
SSD	State Significant Development
State and Regional SEPP	*State Environmental Planning Policy (State and Regional Development) 2011*
TfNSW	Transport for NSW
tpa	Tonnes per annum
TSP	Total Suspended Particulate
TTIA	Traffic and Transport Impact Assessment
TTPP	The Transport Planning Partnership
ULABS	Used Lead Acid Batteries. Spent lead acid batteries commonly found in automobiles
UST	Underground storage tank
VIS	Vegetation Information System
WARR Act	*Waste Avoidance and Resource Recovery Act 2001*
WBCSD	World Business Council for Sustainable Development
WDP	Western District Plan
WMP	Water Management Plan
WMS	Water Management System

EXECUTIVE SUMMARY

Overview

Sell & Parker Pty Ltd (Sell & Parker) (the Applicant) currently own and operate a resource recovery facility (RRF) at 23-43 and 45 Tattersall Road, Kings Park (the Proposal Site). The RRF currently operates under approval SSD 5041 and three associated modifications (the Original Approval).

The Applicant is seeking approval for the expansion of throughput of the existing RRF to allow the increase in the throughput limit from 350,000 to 600,000 tonnes per annum (tpa) of scrap metal (State Significant Development (SSD 10396) (the Proposal). The existing infrastructure at the Proposal Site has the capacity to accommodate the increased throughput and therefore, no construction works would be required. The Proposal would also assist in achieving the higher recycling standards prescribed by China's National Sword Policy as well as further reducing the volume of scrap metal that otherwise goes to landfill.

The Environmental Impact Statement (EIS) for the Proposal was publicly exhibited between 1 October 2020 and 29 October 2020.

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

Submissions

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

- Department of Planning, Industry and Environment (DPIE)
- Blacktown City Council (Council)
- Environmental Protection Authority (EPA)
- Transport for NSW (TfNSW)
- Fire and Rescue NSW (FRNSW)
- Environment, Energy and Science (EES) Group within DPIE
- Crown Lands
- Sydney Water.

In addition to government agencies, a number of submissions from the community (including residents and landowners and business operators) surrounding the Proposal Site.

Government agency and public submissions were provided to Sell & Parker's team of technical specialists. Based on the content of the submissions, they were addressed by environmental impact assessment professionals or alternatively the technical specialists provided responses to the issues raised.

In response to the submissions received, some mitigation measures have been updated to better avoid, remedy or mitigate the identified impacts (refer to Section 6 of this Response to Submissions). The mitigation measures presented in this RtS represent the final mitigation measures to be incorporated into the conditions for the approval of the Proposal, as required by Schedule 2, Part 3, clause 7(1)(e) of the *Environmental Planning and Assessment Regulation 2000* (EP&A Regs).

1 INTRODUCTION

Sell & Parker (the Applicant) are seeking approval for the expansion of throughput of an existing Resource Recovery Facility (RRF) located at 23-43 and 45 Tattersall Road, Kings Park (the Proposal Site). The Proposal would allow an increase of the throughput limit of the existing RRF from 350,000 to 600,000 tonnes per annum (tpa) of scrap metal.

An Environmental Impact Statement (EIS) was prepared to seek approval for the Proposal under Part 4, Division 4.7 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) (SSD 10396). In particular, the EIS was prepared to address, and be consistent with, the Secretary's Environmental Assessment Requirements (SEARs) issued on 19 December 2019 by the Department of Planning, Industry and Environment (DPIE).

The EIS was publicly exhibited between 1 October 2020 and 29 October 2020. During this exhibition period submissions were invited from all stakeholders, including members of the community and government agencies.

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

1.1 Proposal overview

Sell & Parker are seeking approval under Part 4, Division 4.7 of the EP&A Act to increase the scrap metal processing throughput at the Proposal Site from 350,000 to 600,000 tpa.

The existing infrastructure at the Proposal Site has the capacity to accommodate the increased throughput. The Proposal would not require any construction works and would not change the mix of materials currently received at the RRF. However, adjustments to site management practices would be required in terms of internal vehicle movements and stacking locations to allow the increased throughput.

The Proposal would utilise existing road infrastructure, other utility installations and water management assets. Table *1-1* presents a comparison between the Original Approval and the Proposal. Figure 1-1 below shows the operational layout of the Proposal.

Table 1-1*: Summary of proposed amendments to existing development approval*

Aspect	Approved Development (Original Approval)	Proposal	Difference
Processing capacity	350,000 tpa	600,000 tpa	Additional 250,000 tpa
Waste storage	Hazardous, restricted solid, liquid, clinical and related waste and asbestos waste.[1]	No changes proposed	Nil
Hours of operation	Oxy-acetylene torch cutting: – Monday to Saturday: 9am to 3pm	No changes proposed	Nil
	• All other activities: – Monday to Saturday: 6am to 9pm		
	• No activity on Sundays or public holidays for the above		
	• Maintenance and cleaning: – Monday to Saturday: 9pm to 6am – Sunday: 24 hours		

Aspect	Approved Development (Original Approval)	Proposal	Difference
	– No activity on public holidays.		
Number of employees	Approx. 119 staff employed with up to 79 on-site at one time	No changes proposed	Nil
Traffic and transport	• Approximately 298 vehicle movements per day comprising 51 light and 247 heavy vehicles.	• Approximately 513 vehicle movements per day comprising of 89 light vehicles and 424 heavy vehicles • Provision of up to 35 stacking spaces for heavy vehicles	215 additional vehicle movements comprising 38 light and 177 heavy vehicles
Site Layout	• As approved in MOD 3 (Figure 1-1 and Appendix C[2] of the EIS)	• Minor changes to working stockpile locations to allow efficient vehicle movements throughout the Proposal Site. A revised stockpile plan showing the location and sizes of stockpiles is provided as Appendix G of the RtS and is identical to the plan under SSD5041 Mod 3.	Nil

[1] Waste storage description is consistent with the fee-based activity description with EPL 11555

2 Note that changes to the appearance of the Site Layout Plan (as presented in Mod 3) have been made to improve legibility and remove references to infrastructure 'proposed' under Mod 3 (as Mod 3 changes have been predominately completed). However, consistent with this Proposal, site infrastructure remains unchanged.

There have been no amendments to the Proposal description post exhibition of the EIS (i.e. as part of this RtS).

LEGEND

- Proposal site boundary
- Operational area
- Property boundary
- Watercourse

ARCADIS AUSTRALIA PACIFIC PTY LTD
ABN 76 104 485 289
Level 16, 580 George St | Sydney NSW 2000
P: +61 (0) 2 8907 9000 | F: +61 (0) 2 8907 9001

Coordinate System: GDA 1994 MGA Zone 56
Date issued: August 4, 2020
Aerial imagery source: nearmap Jun 2020

1:3,000 at A4

ARCADIS

Figure 1-1: Proposal site layout

1.2 Purpose of this report

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

1.3 Statutory approval process

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

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

The *Blacktown Local Environmental Plan 2015* (Blacktown LEP) is the primary Environmental Planning Instrument (EPI) that applies to the Proposal Site. Under Clause 2.1 of the Blacktown LEP, the Proposal Site is zoned IN1 – General Industrial. The Proposal would not change the current land use of the Proposal Site or alter the structure of the approved RRF. Therefore, the Proposal would remain consistent with the objectives of the IN1 zone. Development control plans (DCPs) are not applicable to SSD under Clause 11 of the State and Regional SEPP.

The RRF currently operates under Environmental Protection Licence (EPL) No. 11555 which would require to be amended as prescribed by the *Protection of the Environment and Operations Act 1997* (POEO Act).

1.4 Structure of this report

The structure of this RtS is as follows:

- **Section 1** – Introduction: provides an introduction to and overview of the Proposal, the relevant statutory approval pathway and the structure of the RtS
- **Section 2** – Exhibition and consultation: provides a description of the consultation which was undertaken to date
- **Section 3** – Overview of submissions: provides an analysis of the submissions received during the exhibition of the EIS and identifies the key issues raised
- **Section 4** – Response to government agency submissions: provides a catalogue of submissions received from government agencies and their responses
- **Section 5** – Response to community submissions: provides a summary of the community submissions received and responses to each issue raised
- **Section 6**– Revised compilation of mitigation measures: provides a revised list of mitigation measures to include any changes as a result of submissions received and the updated impact assessments
- **Section 7** – Conclusion: provides a summary and conclusion to the RtS.

2 EXHIBITION AND CONSULTATION

2.1 EIS consultation

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

- DPIE
- Environment Protection Authority (EPA)
- Sydney Water
- Transport for NSW (TfNSW)
- Fire and Rescue NSW (FRNSW)
- Blacktown City Council (Council)
- Department of Primary Industries (DPI) *
- Environment, Energy and Science Group (EES)
- Water Group / Natural Resources Access Regulator (NRAR)*.

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

2.1.1 EIS community consultation

Community consultation was undertaken from 15 June 2020 to 31 July 2020. The consultation offered during the preparation of the EIS included:

- A dedicated webpage that offers general information about the Proposal, together with a timeline, factsheet and opportunity to lodge submissions on-line
- A dedicated contact number and project email address were used to provide a central point of contact for community enquiries
- A total of 1,850 letters that were mailed out to landowners and the community seeking feedback on the Proposal. This included a 1 km radius from the Proposal Site containing the suburbs of Blacktown, Kings Park and Kings Langley (Figure 2-1). The letters contained a community factsheet and timeline as well as methods for submitting enquiries.

Community consultation responses received during this time were considered as part of the preparation of the EIS.

*No submissions (during the preparation of the EIS) were received from these agencies.

LEGEND

Proposal site

Community consultation newsletter boundary

1:15,000 at A4

ARCADIS

ARCADIS AUSTRALIA PACIFIC PTY LTD
ABN 76 104 485 289
Level 16, 580 George St | Sydney NSW 2000
P: +61 (0) 2 8907 9000 | F: +61 (0) 2 8907 9001

Coordinate System: GDA 1994 MGA Zone 56
Date issued: November 26, 2020
Aerial imagery supplied NSW LPI

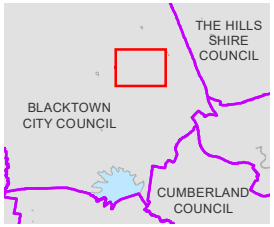


Figure 2-1: EIS community consultation area

The community newsletter contained the Proposal description and timeline as well as methods for submitting enquiries and details to reach Sell & Parker as detailed in the Section 6.2 and Appendix O of the EIS.

Sell & Parker received nine (9) community and organisation comments responding to the newsletter. The comments are detailed and addressed (as generally presented within the EIS) by the Proponent in Table 2-1 below.

Table 2-1: Community and organisation comments during EIS consultation phase

Topic	Comment	Response
Noise	Concerns around existing noise in particularly, conveyor belt noise, beeping, reversing alarms. Concerns that the Proposal would increase noise levels. Concerns around noise impacts to residential receivers.	The Proposal would not require a change to the existing approved operational or maintenance hours. To assess potential noise impacts associated with the Proposal a Noise and Vibration Impact Assessment has been prepared. The assessment has been summarised in Section 9 and is included as Appendix H in the EIS. In response to comments from the community and agencies a Supplementary Noise and Vibration Impact Assessment has been prepared and is include as Appendix C of this RtS. These assessments considered potential noise impacts to nearby residential receivers including sleep disturbance impacts. Both assessments found that the Proposal would comply with the established noise criteria at all receiver locations and would not result in a significant noise impact. Notwithstanding these findings, Sell & Parker are proposing to increase the height of the noise wall on the south eastern boundary of the Proposal Site by around 2.2 metres (along 70 linear metres) to provide further shielding to residents in areas of concern identified through consultation. Further detail on this mitigation measure is provided in Section 6 of this RtS.
Stormwater	Is there discharge to Breakfast Creek?	Existing water management infrastructure would be utilised for the Proposal. As is current practice, run-off from roofs drain into the existing stormwater drainage channels which feed to Breakfast Creek. No runoff from operational areas where scrap metal is managed will discharge to Breakfast Creek.
Air quality	Concerns around dust impacts to properties	An Air Quality Assessment has been prepared by Northstar Air Quality Consultants and has assessed potential air quality impacts in accordance with the *Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales (NSW EPA, 2017)*. The assessment was summarised in Section 8 and is included as Appendix G in the EIS. A Supplementary Air Quality Assessment has been prepared to address comments raised by the community and agencies during the exhibition period. The Supplementary Air Quality Assessment has been included as Appendix D of this RtS. The Air Quality Assessment and Supplementary Air Quality Assessment identified that operation of the Proposal would not result in exceedance of the established air quality criteria and would not result in a significant impact to surrounding receivers.
Documentation	Please provide a link to the submission page of DPIE	The Proposal EIS (and this RtS) will be located on the DPIE major projects web page (https://www.planningportal.nsw.gov.au/major-projects/project/25901)

2.2 Public exhibition consultation

The EIS for the Proposal was placed on public exhibition between 1 October 2020 and 29 October 2020 in accordance with Schedule 1 of the EP&A Act.

Due to COVID-19 restrictions, the EIS was not available at a physical location, however it was available in electronic format on the DPIE planning portal website.

2.3 Next steps

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

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

During the exhibition of the EIS a total of 62 public submissions (public and organisation) were received, including 53 objections, 8 comments and one submission in support of the proposal.

Based on the number of objections, it is possible that the SSD Application will trigger IPC determination.

3 OVERVIEW OF SUBMISSIONS

This section provides an overview of submissions received during the exhibition period of the Proposal. Submissions received were from both government agencies and the community (including organisations within the community).

An overview of the submissions and a summary of the process for responding to submissions is provided below.

3.1 Submissions received

3.1.1 Government agency

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

- DPIE
- Council
- EPA
- TfNSW
- FRNSW
- EES
- Crown Lands
- NRAR
- Sydney Water.

The key issues, at a higher level, raised by government agencies are listed in Table 3-1 below.

Table 3-1: Key issues raised by government agencies

Agency	Key issues							
	Noise	Air	Traffic	Stormwater	Flooding	Hazards	Fire	Property
DPIE	✓	✓	✓			✓	✓	
Council	✓	✓	✓					
EPA	✓	✓						
EES				✓	✓			
TfNSW			✓					
FRNSW							✓	
Crown Lands								✓

3.1.2 Community and organisations

A total of 62 submissions were received from community stakeholders, including four organisational submissions (Figure 3-1) during exhibition.

Organisations

Four organisations provided submissions from the Kings Park area. These organisations are all within 300 metres of the Proposal Site as identified on Figure 3-4. These organisations include:

- Steve's Auto Group / Steve's Automotive[1]
- Independent Mowers and Chainsaws
- North Western Surveys
- Pick 'N' Payless.

Community and organisation distribution

Of the 62 submissions, 93% were from residents and organisations within the Blacktown Local Government Area (LGA). Four submissions were received from other suburbs outside of the Blacktown LGA including Berala (Cumberland Council), Carlingford (City of Parramatta), St Clair (Penrith City Council) and Wentworth Falls (City of Blue Mountains) accounting for the remaining for 6% of community submissions. One submission did not provide a specific location (Not identified 2%).

Figure 3-1 below highlights the distribution of submissions across suburbs within the Blacktown LGA, with the majority (52%) received from residents located in Blacktown, the suburb located directly south and east of the Proposal Site. Kings Langley, to the north-east provided the second highest number of submissions (18%). Other suburbs that represented all organisation submissions and a significant proportion of the community submissions included Kings Park (the Proposal Site location) (15%), Lalor Park (5%) and Doonside to the west (2%).

Detailed responses to community and organisation comments have been provided within Section 5.1 of this RtS.

[1] Steve's Automotive submitted three submissions, two through organisation submissions and one through community submissions. The information within the submissions has been included in responses but has been assessed as one organisation submission and one community submission.

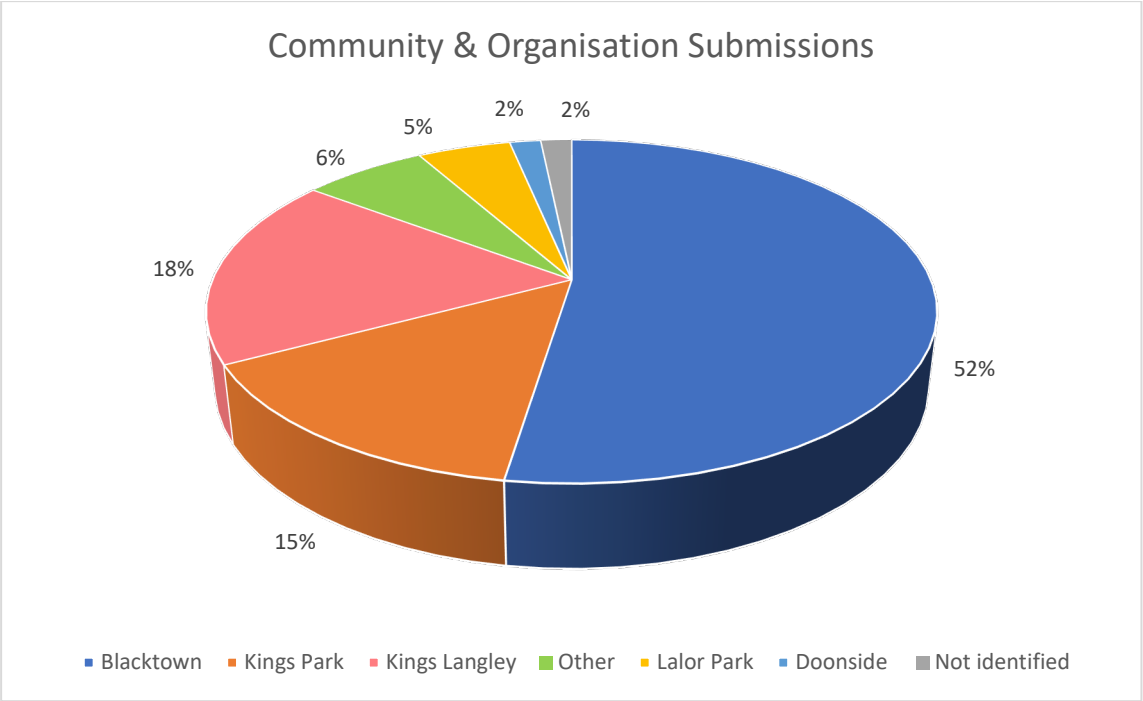


Figure 3-1: Community and organisation submissions by suburb/LGA

Priority area

Submissions by suburb (Figure 3-3) and the area east of the Proposal Site (Figure 3-4) are displayed below. Twenty-two of the 57 public submissions from the suburbs of Blacktown, Kings Park and Kings Langley (publicly identified by the submissions process) are from residents east of Sunnyholt Road, approximately 300 m (at the closest point) east of the Proposal Site. All four of the organisation submissions were identified as being located in the Kings Park industrial estate within 300 m of the Proposal Site.

To recognise the submissions received, the streets of interest in Figure 3-4 have been identified as a priority area of focus for this RtS. The community and organisations located in this area have expressed comments regarding key aspects of noise and vibration, air quality and odour, traffic and transport and general concern for the Proposal being located in proximity to a residential area.

To further investigate the comments raised and address technical comments provided by stakeholders, additional modelling and assessment has been undertaken for air quality and noise.

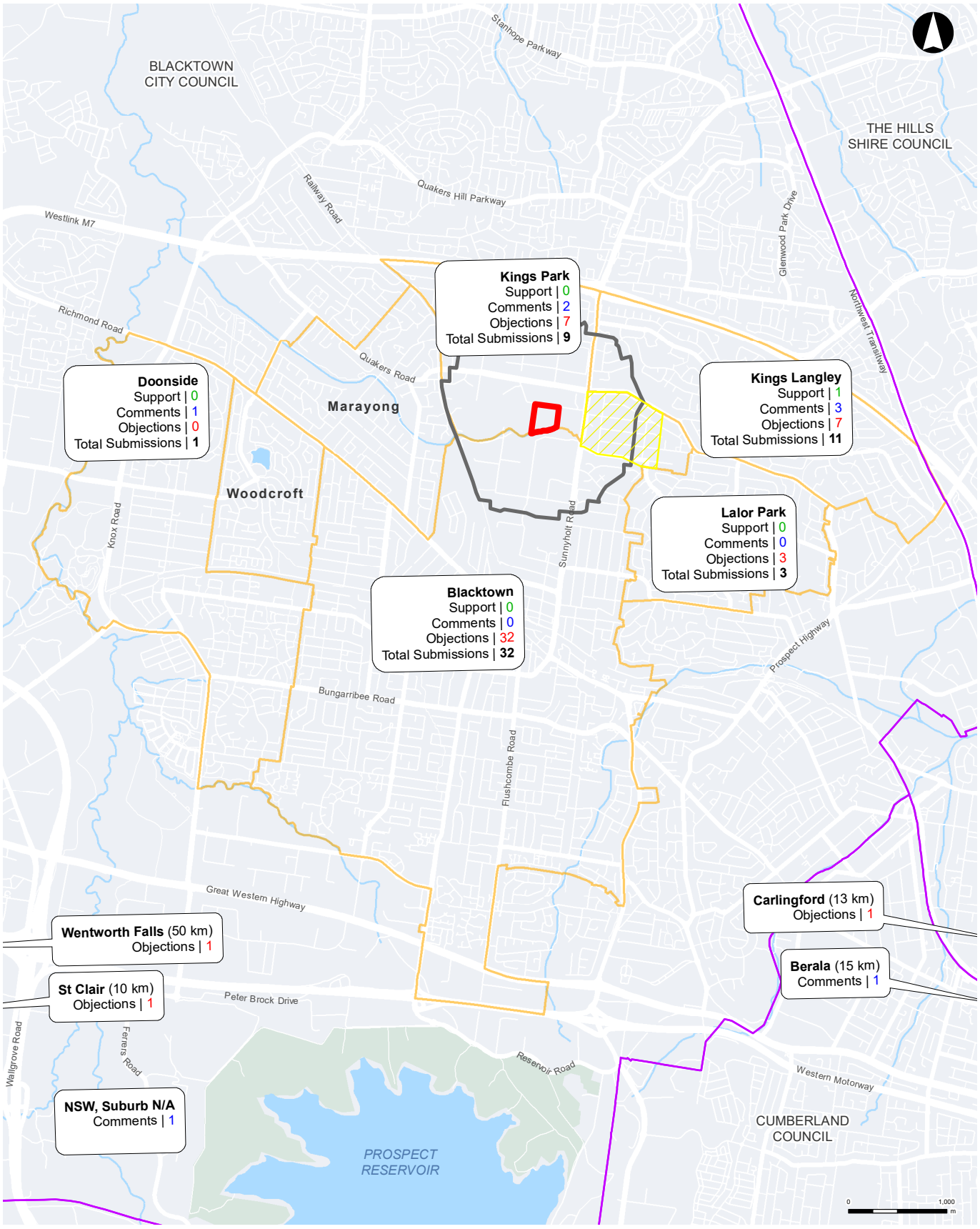
The Air Quality Assessment as presented as Appendix G of the EIS has been updated to refine the input assumptions for the air quality model in response stakeholder comments. The Supplementary Air Quality Assessment has been included as Appendix D of this RtS. The updated modelling is generally consistent with the Air Quality Assessment and would not result in additional exceedances of the established air quality Criteria.

The Noise and Vibration Impact Assessment as presented in Appendix H of the EIS has been updated to include additional background noise monitoring (undertaken Thursday 11th to Wednesday 24th February 2021) in response to stakeholder comments. The additional noise monitoring was undertaken at the locations shown on Figure 3-2.

The updated noise monitoring was used to inform an updated noise model for the Proposal. The updated model identified that the Proposal would not result in exceedances of the established noise criteria. Nonetheless, as part of the commitment to continuous improvement and to reflect comments provided within community submissions, Sell & Parker propose to incorporate additional mitigation for noise generated at the Proposal Site. Sell & Parker will raise around 70 linear meters of the existing south eastern noise wall (located on the south eastern boundary of the Proposal Site) by approximately 2.2 metres to provide additional screening to sensitive receivers in the priority area to

the east of the Proposal Site. This has been committed to as a mitigation measure as described in Section 6 of this RtS.

Figure 3-2 Noise monitoring and receiver locations



LEGEND

- Proposal site
- Local government area
- Community consultation newsletter boundary
- Watercourse
- Community submissions priority area
- Suburbs of interest

ARCADIS AUSTRALIA PACIFIC PTY LTD
ABN 76 104 485 289
Level 16, 580 George St | Sydney NSW 2000
P: +61 (0) 2 8907 9000 | F: +61 (0) 2 8907 9001

Coordinate System: GDA 1994 MGA Zone 56
Topographic base supplied by NSW Spatial Services, Aerial by ESRI
Date issued: November 26, 2020

1:55,000 at A4

ARCADIS

Figure 3-3: Community submissions by suburb

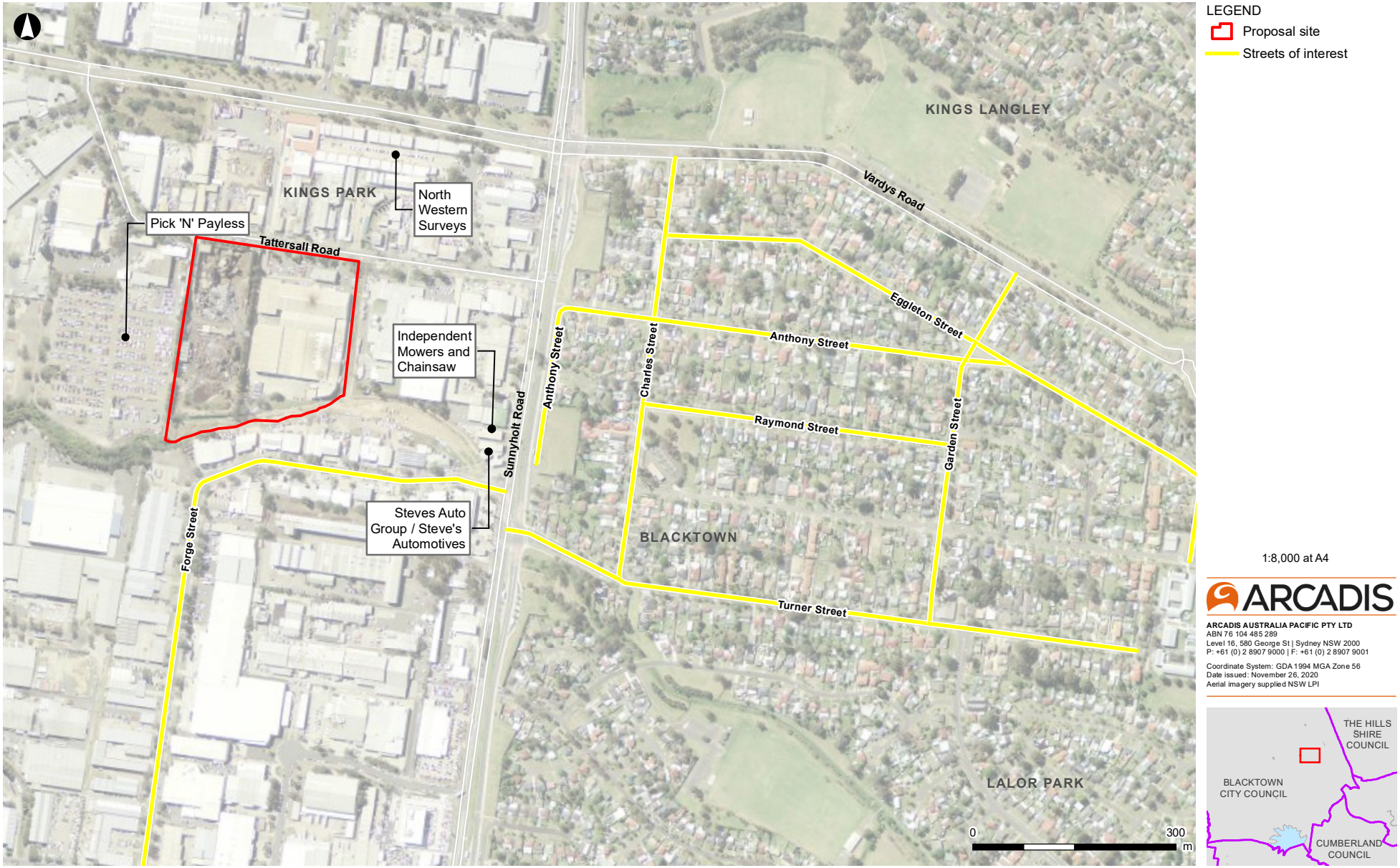


Figure 3-4: Community and organisation priority area

3.1.3 Summary of community comments

This section provides a summary of the submissions raised by the community. Organisation submissions have been excluded from this section and are discussed individually in Section 5.2.

The aspects identified in the submission analysis are outlined in Table 3-2 and Figure 3-5. Each submitter may have raised more than one comment in relation to a certain aspect and comments relating to multiple aspects. The most prominent aspects raised in community submissions were noise and vibration (39.5% of submissions).

Section 5.1 of this RtS outlines in greater detail the key issues that the community expressed within these aspects.

Table 3-2: Summary of aspects identified in community submissions

Aspect	Number of submission comments	Percentage (%)
Noise and vibration	48	39.5
General	26	22.7
Traffic and transport	9	7.6
Air quality and odour	9	7.6
Visual	8	6.7
Socio-economic	8	6.7
Hazards and risk	7	5.9
Processing capacity	4	3.4

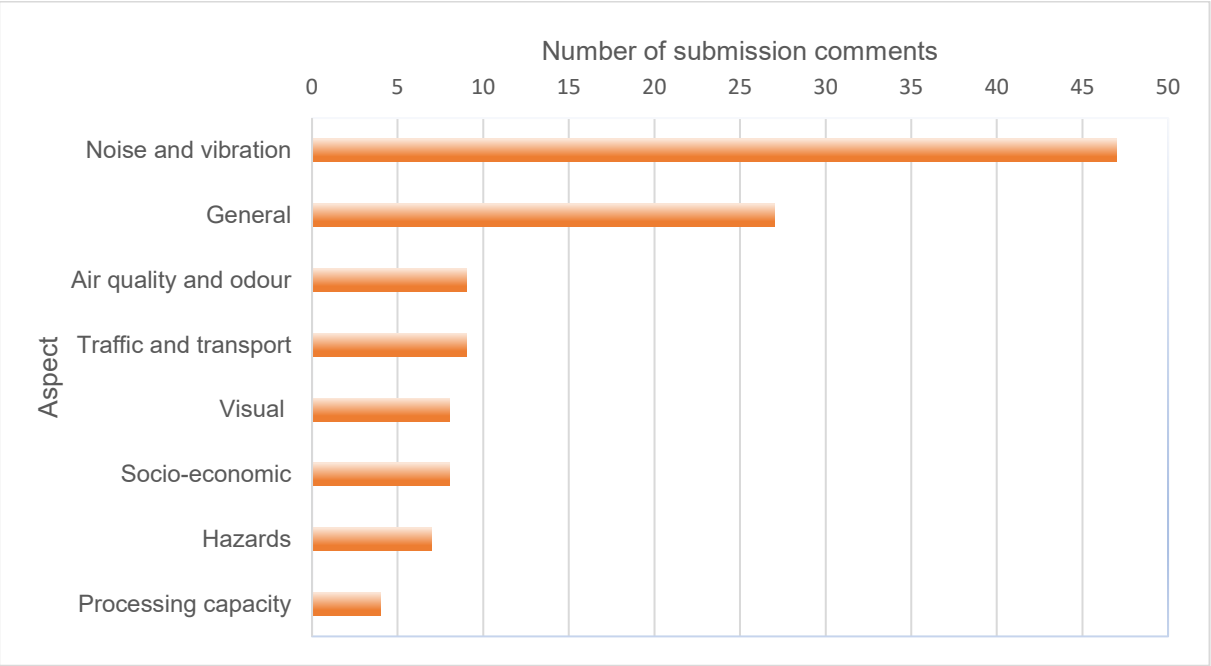


Figure 3-5: Breakdown of aspects by tally of submissions

The community submissions raised concerns surrounding noise and vibration, air quality and odour, traffic and transport and general comments regarding the Proposal Site being located close to a residential community.

The top two comments identified within the community related to potential concerns of noise and vibration concerned:

- The potential for increases of general operational noise impacting residents in surrounding communities
- The potential for increases to operational noise specifically on weekdays (morning and evening) and weekends.

Noise and vibration issues are discussed in greater detail below.

Key issue analysis

Table 3-3 displays a summary of all comments raised by the community during the public exhibition of the EIS.

Submissions included a variety of commentary on existing and proposed operations (within the Proposal). For this reason, sub-aspects have been ranked by highest to lowest submission tallies and into existing operations of the site and under Proposal conditions. These sub-aspects will individually be addressed in the mitigation and monitoring in Section 6 of this RtS.

Note that each submitter may have raised more than one comment and may have raised concerns relating to multiple aspects. As such, the number of issues raised in an aspect or issue does not sum to the total number of submissions.

Table 3-3: Summary of key issues raised by the community

Aspect	Sub-aspect	Tally
Noise and vibration	**Existing operations**	
	Sleep Disturbance	7
	Shredder	5
	Associated with the Proposal	
	Morning and evening operations	34
	General operations	28
	Health concerns	26
	Mitigation	12
	Acoustic barrier	11
	Community solution	8
	Monitoring	4
	General machinery	4
	Noise assessment	3
Air quality and odour	**Existing operations**	
	Dust	5
	Health concerns	3
	Filtration	2
	Associated with the Proposal	
	Low air quality	2
	Mitigation	2
	Odours	1
	Increased emissions from trucks	1

Aspect	Sub-aspect	Tally
Traffic and transport	**Existing operations**	
	Parking	2
	Associated with the Proposal	
	Congestion	7
	Heavy vehicles	8
Processing capacity	**Associated with the Proposal**	
	Infrastructure	2
	Processing machinery activities	2
Hazards and risk	**Existing operations**	
	Hazardous materials	4
	Associated with the Proposal	
	Fire	4
General	**Existing operations**	
	Industry area	17
	Complaints register	6
	Associated with the Proposal	
	Property value	6
	Industry in Western Sydney	2
	Conditions of Consent	1
	Monitoring	1
	Employment opportunities	*1*
	Waste liquid	1
Visual	**Existing operations**	
	Visual appearance	8
Socio-economic	**Existing operations**	
	Local businesses	3

Noise and vibration

Figure 3-6 displays the tally of submissions of noise and vibration aspects identified by the community. Submissions have been separated into existing site operations (grey) and submissions specifically under Proposal conditions (orange) as described in the section above.

The submissions raised under noise and vibration were primarily related to operating hours, specifically potential increases in noise within operational hours (mornings and evenings) and weekends, and the potential for increases of general operational noise impacting residents in surrounding communities. Other submissions categorised under noise and vibration related to noise induced health impacts as a result of the Proposal.

A compilation of the mitigation and monitoring measures for noise and vibration and other aspects are detailed in Section 6 of this RtS with a focus on the community priority area.

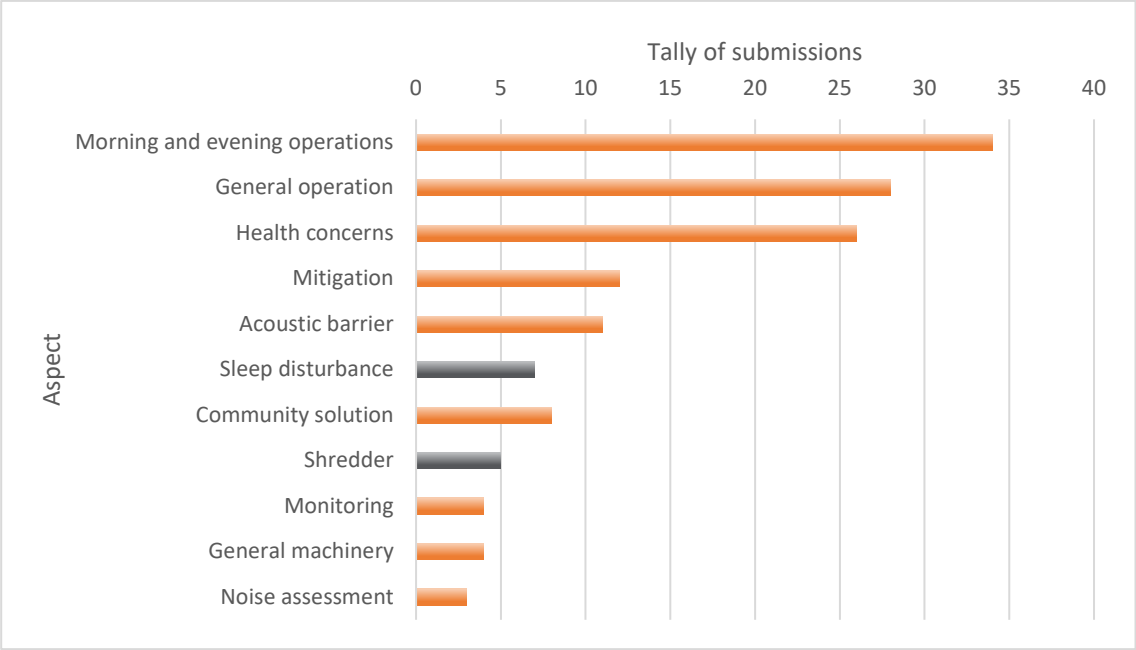


Figure 3-6: Noise and vibration key comments breakdown (grey – existing operations, orange – under Proposal conditions)

3.2 Submission response methodology

3.2.1 Technical specialist input to submissions

Government agency, organisation and public submissions were provided to the Applicant's team of impact assessment specialists and technical specialists (as required). Submissions were reviewed and summarised by Arcadis and technical specialist input sought, where relevant, to ensure that this RtS adequately captures and responds to all issues raised in the submissions.

The technical specialist responsible for preparing the relevant specialist report prepared technical responses to key issues and other issues raised in both the government agency, organisations and community submissions. Technical specialists utilised information provided within the EIS, undertook additional assessment and drew upon information provided within the technical specialist's reports, appended to this RtS.

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

A summary of technical specialists engaged for the preparation of this report is provided below in Table 3-4.

Table 3-4: Technical specialist input summary

Aspect	Company
Environment and planning	Arcadis
Stockpiles and processing capacity	Sell & Parker
Noise and vibration	Renzo Tonin & Associates
Air quality and odour	Northstar
Traffic and transport	TTPP
Water management and flooding	Arcadis

Aspect	Company
Hazards and risk	Sell & Parker

3.2.2 Government agencies

As outlined in Section 3.1, a total of nine government agencies provided submissions. Each submission varied in terms of the number and type of items for consideration raised, with some agencies, depending on their function/responsibility, raising more issues than others.

The submissions were provided to the Applicant's environmental assessment specialists and technical specialists (as required) for consideration and preparation of a response, as discussed in Section 3.2.1 above. The comments provided within these agency submissions are responded to individually in Section 4.

3.2.3 Community and organisation submissions

As outlined in Section 3.1.2, 62 submissions were received from members of the public and organisations. The submissions were assessed such that the key points are clear and concise whilst maintaining the privacy of the member of the public.

Organisation method

Submissions from organisations were provided to the Proponent's environmental assessment specialists for consideration and preparation of a response, as discussed in Section 3.2.1.

Each submission varied in terms of the type of items for consideration and were separated from community submissions to individually capture the level of detail from each organisation. These have been comments have been responded to in Section 5.2.

Community method

The community submissions were summarised into key aspects and sub-aspects. Each submission was given a reference number, allowing analysis of submissions at an aspect level.

Comments were then further categorised into whether the submitter had commented on existing operations of the Proposal Site or specifically to the Proposal. These have been identified in Table 3-3 and responded to in Section 5.1.

4 RESPONSE TO GOVERNMENT AGENCY SUBMISSIONS

Submissions were received from a total of nine government agencies as noted in Section 3.1 of this RtS. Submissions received from Government agencies have been responded to in Table 4-1 to Table 4-7.

4.1 Blacktown City Council (Council)

A formal submission comprising a letter (dated 29 October 2020) was received from Council. Comments have been summarised in the table below.

Table 4-1: Response to Government Agency submission – Blacktown City Council

Aspect	Issue	Response	Reference
1. Traffic	Further information is required to address the following specific issues: a. There will be substantial delays and queuing at the existing 2 signalised intersections (between Sunnyholt and Vardys Roads, and Sunnyholt and Tattersall Roads). Transport for NSW must ensure that these signalised intersections can operate sufficiently in light of the proposal and the existing surrounding developments. TfNSW's concurrence is necessary to ensure the expansion does not adversely impact on the local and State road network.	As shown in Appendix E (TTIA) and Section 7 of the EIS, the Sunnyholt – Vardys Roads, and Sunnyholt – Tattersall Roads currently operate at a poor level of service (LoS) in all peak periods (2020), excluding Sunnyholt Road – Tattersall Road in the weekday AM peak period. While the Proposal will result in a reduction in LoS at the Sunnyholt Road - Tattersall Road intersection (in the Saturday peak), the additional average delay per vehicle is considered minor (around 10 seconds average delay per vehicle during the Saturday peak and substantially less at other times). The TTIA concludes that both intersections will continue to operate above capacity with or without the Proposal (i.e. in the context of background traffic volumes, the contribution from the Proposal is considered negligible). TfNSW were consulted during the EIS exhibition period and response was provided in relation to the EIS. A response to TfNSW's submission is provided below. TfNSW did not raise the performance of these intersections as a concern.	Section 7 and Appendix E of the EIS
	b. In the current operation, there are already trucks parking on Tattersall Road as early as 6 am causing safety concerns. Considering that the proposed scrap metal throughput limit will be significantly increased, this on street truck parking and stacking problem is only going to get worse. This problem suggests that the road network and subject site cannot adequately cater for the current use, let alone a major expansion as proposed by this SSD application. The Applicant must advise how they are going to stop this problem continuing, and getting worse with the expansion, and the proposal cannot be supported until this issue is resolved.	As noted in Section 7 and Appendix E of the EIS, to minimise the potential for trucks parking on Tattersall Road, up to 35 stacking spaces (areas where vehicles can wait to access an operational area of the Proposal Site) will be provided within the Proposal Site. This traffic assessment determined that available on-site stacking spaces can accommodate the traffic generation associated with the Proposal. Under current operations, Sell & Parker manage their internal fleet trucks to minimise the requirement for parking on Tattersall Road. Sell & Parker fleet trucks are required to comply with a Code of Conduct ensuring that when operating on the Proposal Site or the	Section 7 and Appendix E of the EIS

Aspect	Issue	Response	Reference
		surrounding road network road rules are maintained and road safety is not compromised. It is understood that some vehicles park legally within the unrestricted parking areas along Tattersall Road prior to the commencement of operations for the Proposal Site and surrounding businesses. As these vehicles are not Sell & Parker fleet trucks (and may not even be destined for the Sell & Parker site), they are outside of Sell & Parker's control. These trucks are parked legally and therefore do not impact on the use or safety of Tattersall Road. The existing OEMP will be updated to reflect the operational changes associated with the Proposal. Mitigation measures previously identified for the Original Approval (SSD-5041) will continue to be implemented for the Proposal as described in the TTIA and Section 7 of the EIS. Overall, the Proposal Site can accommodate the additional vehicles required for the Proposal and any Sell & Parker vehicles will need to comply with the relevant Code of Conduct.	
2. Environmental Health	**a. <u>Noise Impact Assessment</u>** • It is unclear from the report if the activity "*Operation Oxy-acetylene torch cutting Monday to Saturday 9 am to 3 pm*" has been incorporated into the predicted noise modelling (Pg 20 S.7). The Applicant is required to clarify this.	The noise impact from the oxy-acetylene is negligible. Measurements of the oxy acetylene cutting using a single oxy-acetylene torch have been conducted and included in the Supplementary Noise and Vibration Impact Assessment (refer to Appendix C). The results of the Supplementary Noise and Vibration Impact Assessment (including the operation of the oxy-acetylene torch) concludes that modelled noise levels at all receivers comply with relevant project noise trigger levels without any additional noise mitigation measures.	Appendix C of this RtS
	• Page 30 of the noise report states that "*Vibration measurements were also taken for a large metal shear located at the Sell & Parker Darwin plant with a capacity of 350,000 tonnes a year which is similar to the proposed metal shear for the Kings Park development*". However, the	While vibration effects are not dependent on the change of throughput, a vibration impact assessment was undertaken and is provided in Appendix C of this RtS. As noted in the Supplementary Noise and Vibration Impact Assessment (Appendix C of this RtS), attended vibration measurements were undertaken for the existing Hammer mill at	Appendix H of the EIS Appendix C of this RtS

Aspect	Issue	Response	Reference
	proposal is to increase to 600,000 tonnes per annum, being far greater. On this basis this comparison is flawed and, if so, the vibration measurements are being under-estimated and are misleading.	the Proposal Site in addition to the metal shear at the Sell & Parker facility in Darwin. The Supplementary Noise and Vibration Impact Assessment concluded that the measured vibration levels in both sites show compliance with the vibration criteria for both continuous vibration and intermittent vibration. In addition, it is noted that the foundations of the metal shear at the Darwin site are embedded in rock and the surrounding soil is hard, unlike the geology of the Proposal Site which consists of soft clayey soil. The potential for vibration impacts from the metal shear at the Proposal Site are expected to be lower than the measured levels accounting for the ground impedance of softer ground at the Proposal Site. A review of the Sell & Parker complaints registers shows that there have been no complaints related to vibration from Sell & Parker's operations in the last seven years.	
	• 427 heavy vehicle movements are proposed per day, but the acoustic modelling undertaken assumes 7 trucks on site at any one time. The proposal would result in an "additional 215 vehicles on a daily basis or 15 vehicles per hour across a 15-hour workday" (Pg 59 of EIS). It is noted that recent aerial views of the premises show more than 7 trucks on the premises at one time and, on this basis, the expansion will undoubtedly result in more than 7 trucks on site, and the acoustic modelling is not a true reflection of what is currently happening on site, or intended to happen on site, and therefore the acoustic modelling is flawed and misleading.	As noted in the Noise and Vibration Impact Assessment (Appendix H and Section 4.3.4 of the EIS) the Proposal will result in an additional 215 vehicles on a daily basis or 15 vehicles per hour across a 15-hour workday (as per approved operational hours). The noise assessment considers a 15 minute assessment period. 427 trucks across a 15 hour workday is approximately 7 vehicles per 15 minutes entering and exiting the site. While there may be more than 7 trucks on site at any one time, it is anticipated that only 7 vehicles would complete the full range of on-site activities within a 15 minute period e.g. tipping, loading. Additional vehicles on the site would be stacked i.e. not moving and would have a limited contribution to noise. The Noise and Vibration Impact Assessment and the Supplementary Noise and Vibration Impact Assessment have been undertaken by an appropriately qualified expert (Renzo Tonin & Associates) in accordance with relevant legislation and guidelines.	Section 4.3.4 and Appendix H of the EIS
	• Section 8 of the noise impact assessment does not include truck noise along Tattersall Road. During Council's survey of the Kings Park industrial area between 6 am and 7 am on	The assessment undertaken as part of the Noise and Vibration Impact Assessment (Appendix H of the EIS) did not include truck noise along Tattersall Road as there are no residential receivers on this road. The closest residential receivers to the Proposal Site	Section 9 and Appendix H of the EIS

Aspect	Issue	Response	Reference
	various days in July, August and October 2020, trucks were parked and lined up for entry into the premises at 6 am. This included 2-3 trucks in the truck entry driveway before the weighbridge and 3-4 on Tattersall Road. Table 7.1 in Section 7 of the noise impact assessment provided a summary of the sound power level of 7 trucks travelling in and out of the premises, but not in relation to trucks idling on Tattersall Road. There does not appear to be any worst-case scenario being measured or assumed within the predicted noise levels to include trucks parked/idling on the street and especially during the 6-7 am shoulder period for sleep disturbance criteria. Council is very concerned that this has not been measured accurately and will have a much greater noise impact on nearby residents than has been presented in the acoustic report accompanying this EIS.	are located approximately 300 metres east of the Proposal Site. These residential receivers are on the eastern side of Sunnyholt Road. Therefore, the noise assessment considered existing residential receivers affected by additional traffic from the Proposal on existing arterial roads, such as Sunnyholt Road and Vardys Road as noted in Section 9 and Appendix H of the EIS.	
	• Page 19 of the EIS states that "*The pre-shredder has been partially constructed at the approved location". However, as a result of the recent COVID-19 situation (both machinery and personnel availability), there have been delays to the completion of construction and commissioning of this equipment. The pre-shredder in its existing location remains operational. The pre-shredder will be relocated and ready for operations prior to activities associated with this proposal being undertaken. It is understood that the pre-shredder will be operational at this proposed location as soon as possible (subject to global influences - 4th QTR 2020)*." More information is required to clarify if the noise impact assessment report has included the assessment of the proposed pre-shredder end location. The Applicant is also required to confirm if the existing pre-shedder location will remain operational or be removed. Should the existing pre-shedder remain at its current location, a collective noise impact assessment is required for our reconsideration.	The Noise and Vibration Impact Assessment (Appendix H of the EIS) and Supplementary Noise and Vibration Impact Assessment (Appendix C of this RtS) include assessment of the pre shredder at the relocated ('end') position as approved under Mod 3 (SSD-5041). As the physical machinery of the pre-shredder was relocated from the old to new position there is no potential for concurrent operation.	Appendix H of the EIS

Aspect	Issue	Response	Reference
	• Council is also concerned with the absence of noise monitoring during the COVID-19 period as we would like to review and compare that data with the existing data.	The Supplementary Noise and Vibration Impact Assessment (refer to Appendix C) has included additional long term noise monitoring at four locations between 11 February and 24 February 2021 (i.e. with conditions returning to normal). This long-term noise monitoring was used to determine the Rating Background Levels (RBL) and representative ambient noise levels in accordance with the NSW 'Noise Policy for Industry' (NPfI). It is not anticipated that the COVID-19 pandemic will result in any long term change to ambient noise levels.	Appendix C of this RtS
	b. <u>Air Quality Impact Assessment</u> • Page 63 of the report states that "*the annual average PM2. 5 concentrations are predicted to exceed relevant air quality criteria at R33*". However, as highlighted in Section 4.4, the background is (in itself) exceeding the air quality criterion. The Applicant is required to provide further details as to how the above prediction is made.	Prevailing background air quality concentrations (shown in Table 9 of the Air Quality Assessment) were measured using the Prospect Air Quality Monitoring Station (AQMS) between 2014 to 2018. Results show that the annual average concentration of $PM_{2.5}$ in 2018 was 8.5 $\mu g \cdot m^{-3}$ exceeding the criteria at all receivers without the Proposal. The additional contribution from the Proposal at all receivers is less than 0.1 $\mu g \cdot m^{-3}$ and is considered negligible. Page 63 has erroneously noted 'Table 23 indicates that the annual average PM2.5 concentrations are predicted to exceed relevant air quality criteria at R33.' This should have said 'Table 23 indicates that the annual average <u>PM2.5</u> concentrations are predicted to exceed the relevant air quality criteria at <u>all receivers</u>.' As noted, the background is (in itself) exceeding the air quality criterion and the exceedance is not a result of the Proposal. A Supplementary Air Quality Assessment (Appendix D of this RtS) including adjustment to the emissions inventory and model as requested by stakeholders has been prepared. Consistent with the Air Quality Assessment for the EIS, the Proposal would not result in any additional exceedances of criteria. As the assessments do not predict any exceedance of the EPA's air quality criteria at receivers, no additional control or mitigation measures are considered to be warranted.	Section 6 of this RtS. Section 8 and Appendix G (Air Quality Assessment) of the EIS Appendix D of this RtS

Aspect	Issue	Response	Reference
	• The report recommends the "*Provision of dust screens (that also act as acoustic screens) on site boundaries including:* – *A 10 metre high screen on the northern boundary of 45 Tattersall Road* – *An 8 metre high screen on the western boundary* – *An 8 metre high screen on the eastern boundary* – *A 4 metre high screen on the southern boundary of 23 Tattersall Road.*" The Applicant is required to explain how a static wall is capable of controlling dust and particulate matter on a windy day, given that the wall's primary use is only for acoustic attenuation.	It is acknowledged that the primary use of the barrier is for acoustic attenuation (refer to Section 2.4.8 of the EIS). Notwithstanding this, wind breaks, and boundary fences assist with dust management measures by reducing wind shear and reducing near-ground level wind speeds. Further, the dispersion modelling predictions undertaken as part of the Air Quality Assessment and Supplementary Air Quality Assessment (Appendix D of this RtS) have not included any controls associated with the inclusion of dust screens. Therefore, mitigation from these screens will improve air quality above and beyond what is identified in the air quality assessment.	Section 2, Section 8.4 and Appendix G of the EIS Appendix D of this RtS

4.2 Environment Protection Authority (EPA)

A formal submission comprising a letter (dated 21 October 2020) was received from EPA. Comments have been summarised in the table below.

Table 4-2: Response to Government Agency submission – Environment Protection Authority

Aspect	Issue	Response	Reference
1. Noise Impact Assessment	There is uncertainty regarding the measured ambient noise levels, which are critical to establishing appropriate Project Noise Trigger Levels in accordance with the Noise Policy for Industry (NPfI) (EPA, 2017). • The NIA has indicated ambient noise monitoring has not been undertaken as part of the assessment as COVID-19 conditions would likely influence the results due to reduced transport and industrial activity despite EPA observations on 08 October 2020 that the majority of surrounding industrial Premises and mechanical sales/repairs Premises were all operational during this time period. The NIA has therefore relied upon ambient noise monitoring undertaken at two locations generally to the east of the Premises on two occasions several years ago. The original monitoring was undertaken in 2014 with additional synchronised short-term noise monitoring undertaken in 2015 to estimate ambient noise conditions at residential receiver areas located to the north and west of the Premises at the long-term monitoring Premises (east) and representative locations to the west and north to establish a correction factor between the locations. This correction factor has been used to estimate long term ambient noise conditions at residential locations to the north and west of the Premises. The estimated results are inconsistent with long term monitoring results to the west of the premise undertaken as part of SSD 8375 for the Pick n Payless Metal Recovery and Recycling Facility proposal. The proponent must review and revised as appropriate (including undertaking additional noise monitoring) the estimated ambient noise levels for residential receiver locations to the north and west of the Premises and consider, where possible, other sources of ambient noise data including, but not necessarily limited to, SSD 8375 (note a revised NIA has been supplied as part of the proponents Response to Submissions for SSD 8375).	The Supplementary Noise and Vibration Impact Assessment (refer to Appendix C) has included additional long term noise monitoring at four locations between 11 February and 24 February 2021. This long-term noise monitoring was used to determine the Rating Background Levels (RBL) and representative ambient noise levels in accordance with the NSW 'Noise Policy for Industry' (NPfI).. Notwithstanding, it is not anticipated the COVID-19 pandemic will result in any long term impacts to ambient noise levels. The assessment concludes that predicted noise levels at all receivers comply with relevant project noise trigger levels without any additional noise mitigation measures. Nonetheless, as part of the commitment to continuous improvement and to reflect comments provided within community submissions, Sell & Parker propose to incorporate additional mitigation for noise generated at the Proposal Site. Sell & Parker will raise around 70 linear meters of the existing south eastern noise wall (located on the south eastern boundary of the Proposal Site) by approximately 2.2 metres to provide additional screening to sensitive receivers in the priority area to the east of the Proposal Site. This has been committed to as a mitigation measure as described in Section 6 of this RtS.	Appendix C of this RtS

Aspect	Issue	Response	Reference
	• The NIA describes long term monitoring location "L1" as follows: "*The noise monitor was located in the 'free-field'. The noise monitoring location is considered representative of residential receiver locations along Sunnyholt Road*"; and the nearby location L2 as follows: "*The noise monitor was located in the 'free-field'. The noise monitoring location was supplementary for residential receiver locations along Sunnyholt Road*". The Rating Background Level (RBL) of noise for location L2 is some 5dB lower than for location L1 at night. As L2 is noted as being "*supplementary for residential receiver locations along Sunnyholt Road*", the EPA is unsure as to why the RBL at L2 was not used to inform the intrusiveness level for residential receivers to the east of the Premises. The EPA's position is that that the RBL at L2 should be adopted for the intrusiveness level.	The original assessment presented in the EIS was conducted in 2014, when the Proposal Site did not include any night time activities. L1 was selected as the representative receiver for Sunnyholt Road as it had the lower (and more conservative) background noise levels for the operational periods at that time. For consistency, the assessment of noise levels for night time activities also therefore used background levels at L1. The Supplementary Noise and Vibration Impact Assessment (refer to Appendix C) has included additional long term noise monitoring at four locations between 11 February and 24 February 2021. Each location was selected in order to be representative of receiver locations in specific noise catchment areas (NCA). L1 is considered representative of receiver locations within NCA1A and was located in the front yard of 187 Sunnyholt Road Blacktown. L2 is considered representative of receiver locations within NCA1B and was located in the side yard with no line of sight to Sunnyholt Road at 2 Anthony Street Blacktown (refer to Appendix C). Intrusiveness levels for receiver locations within NCA1B are now based on RBL at L2.	Appendix C of this RtS
	There is uncertainty in the meteorological conditions being appropriately considered in the assessment which could lead to underestimating operational noise impacts. • The significance of wind vectors has been undertaken only to nominated receiver locations. However, these receiver locations are in some circumstances representative of groups (catchments) of receiver locations, especially in the case of residential receivers to the west, north and east of the Premises. The NIA appropriately acknowledges in Section 4.1 "*Furthermore, representative locations may be established in the case of multiple receivers as it is usually impractical to carry out measurements at all locations surrounding a Premises*". This fact needs to be considered in terms of relevant meteorological conditions. For example, the assessment has determined that light winds are relevant for receiver R6 (located directly to the east of the Premises). However, the assessment has determined that light winds are not relevant for receiver R1 (located to the south east of the Premises). R1 is representative of residential	As described in Section 5 of Appendix H of the EIS (Noise Impact Assessment), site specific meteorological conditions were considered in accordance with the NPfI. The Supplementary Noise and Vibration Impact Assessment (refer to Appendix C) has included additional consideration of meteorological conditions. The NPfI specifies a procedure for assessing the significance of wind effects, and a default wind speed to be used in the assessment where these effects are found to be significant. The procedure requires that wind effects be assessed where wind is a feature of the area. In the Supplementary Noise and Vibration Impact Assessment, the meteorological conditions analysis considered 16 compass point wind directions (as specified in the NPfI), rather than source to representative receiver directions only. The assessment concludes that as there are greater than 30% occurrence of winds between 0.5 m/s and 3 m/s for certain wind	Appendix C of this RtS

Aspect	Issue	Response	Reference
	receiver locations, including residential receivers directly to the east of the Premises, and therefore some receiver in this "catchment" will potentially be subject to meteorological enhancement from light winds. The proponent must, where a single representative receiver location has been selected to represent a "catchment" of receiver locations, undertake a conservative assessment of meteorological effects and consider worst case source to receiver wind direction in terms of meteorological effects to be applied to the noise modelling.	direction scenarios, these are prevailing wind conditions in accordance with the NPfI. Appendix C outlines the meteorological assessment conditions for each time period used for the assessment of potential noise impacts. When including prevailing meteorological conditions, the assessment concludes that noise emissions for all receivers comply with relevant project noise trigger levels without any additional noise mitigation measures. Nonetheless, as part of the commitment to continuous improvement and to reflect comments provided within community submissions, Sell & Parker propose to incorporate additional mitigation for noise generated at the Proposal site. Sell & Parker will raise around 70 linear meters of the existing south eastern noise wall (located on the south eastern boundary of the Proposal Site) by approximately 2.2 metres to provide additional screening to sensitive receivers in the priority area to the east of the Proposal Site. This has been committed to as a mitigation measure as described in Section 6 of this RtS.	
	There is uncertainty with the noise data used to inform the Project Noise Trigger Levels and sleep disturbance criteria. • The EPA does not concur with the Project Noise Trigger Levels and sleep disturbance criteria presented in the assessment due to the issues raised with the characterisation of the existing acoustic environment in the area as outlined in the comments above. The criteria presented in the NIA, Section 6 needs to be reviewed in terms of the issues raised. The proponent must review and confirm, or amend if and as appropriate, the noise data used to inform the Project Noise Trigger Levels and sleep disturbance criteria taking into account the EPA's comments above.	The Supplementary Noise and Vibration Impact Assessment (refer to Appendix C) has included additional long term noise monitoring at four locations between 11 February and 24 February 2021. This long-term noise monitoring was used to determine the Rating Background Levels (RBL) and representative ambient noise levels in accordance with the NSW 'Noise Policy for Industry' (NPfI). The project noise trigger Levels and sleep disturbance criteria have been updated based on the more recent monitoring data. In consideration of the updated project noise trigger Levels and sleep disturbance criteria, including prevailing meteorological conditions, noise emissions for all receivers comply with relevant project noise trigger levels without any additional noise mitigation measures. Nonetheless, as part of the commitment to continuous improvement and to reflect comments provided within community submissions, Sell & Parker propose to incorporate additional mitigation for noise generated at the Proposal Site. Sell & Parker will raise around 70 linear meters of the existing south eastern noise wall (located on the south eastern boundary of the Proposal Site) by approximately	Appendix C of this RtS

Aspect	Issue	Response	Reference
		2.2 metres to provide additional screening to sensitive receivers in the priority area to the east of the Proposal Site. This has been committed to as a mitigation measure as described in Section 6 of this RtS.	
	There is uncertainty in the calculation methodology and assumptions used to predict operational noise. • The NIA indicates that noise predictions were undertaken using CadnaA utilising the ISO9613 standard. The noise prediction model also appears to have nominated "soft" ground between the source and receiver (NIA, Section 7.2). This is not suitable when considering a paved urban environment and needs to be reviewed. The proponent must detail, explain and justify the method used to determine "neutral conditions" and "prevailing wind conditions" using the ISO standard given that the ISO standard does not have the ability, in isolation, to consider a range of meteorological conditions. The proponent must revise the nominated "soft" ground between the source and receiver to a more suitable option when consider paved urban environments.	The prevailing wind conditions as described in the Noise Impact Assessment (Appendix H of the EIS) were determined using the CONCAWE module in the modified ISO9613 implementation in CadnaA. It is noted that this is considered conservative as the ISO standard already incorporates a mild downwind noise enhancing condition. The noise model for the Supplementary Noise and Vibration Impact Assessment (Appendix C of this RtS) has been updated to reflect "hard" ground between the sound and receiver. With updates to the model noise emissions for all receivers continue to comply with relevant project noise criteria without any additional noise mitigation measures.	Appendix H of the EIS Appendix C of this RtS
	• The NIA notes under Section 7.2 that: "*On the basis of noise measurements undertaken at Sell & Parker's Kings Park Premises and other similar metal recycling facilities, and after accounting for acoustic shielding provided by intervening structures between the Premises and both residential and industrial receptors, the character of noise as perceived at the receiver locations is not tonal, impulsive or low frequency. Therefore, it is not necessary to apply modifying factors to correct for the character of the noise*". The EPA's position is that it does not concur with this statement without an objective assessment that demonstrates that the factors outlined in the NPfI, Fact Sheet C have been considered. This is especially relevant given that the Premises is operational, and measurements can be used to assess the potential for annoying noise characteristics. This should include the intermittency test for activities undertaken during the night-time	Additional attended on site noise measurements were undertaken on Monday, 8th March 2021 to capture noise from existing plant and equipment on site and to undertake verification of the noise model with these noise sources. The additional measurements were taken of individual plant items as well as of activities / processes such as hammer milling and metal shearing, where a number of plant items were operating within an area concurrently and completing typical routine / cycle. An analysis of intermittent noise was undertaken for the night time period only (plant items used during the night time period are only for maintenance and cleaning activities) (refer to Appendix C of this RtS). The analysis concludes that the character of noise as perceived at receiver locations from night time activities (such as the use of forklift, hand tools, pressure hose and crane) is not	Appendix C of this RtS

Aspect	Issue	Response	Reference
	period. Furthermore, on 08 October 2020, EPA Officers did identify intermittent metal processing noises from the Premises at Anthony Street, Blacktown.	considered to be intermittent, and it is not necessary to apply modifying factors to correct for the character of the noise.	
	• The NIA does not include justification that the selected receiver locations used in the assessment are, or are representative of, the worst affected receiver in the catchment. The proponent must identify the catchment that the residential receiver locations are representative of, and then justify why the location represents the worst affected location in the catchment. The presentation of noise contour plots would assist in this determination where factors including relative ground elevation and exposure pathways are considered.	Operational noise contours have been provided in (Supplementary Noise and Vibration Impact Assessment (Appendix C of this RtS) for worst case wind conditions and has included modelling of surrounding built form. As the existing acoustic environment surrounding the Proposal Site varies, noise sensitive receivers have been grouped into noise catchment areas based on areas with similar acoustic environments. Receiver locations have been selected as being potentially the most noise affected by the Proposal within each identified noise catchment area.	Appendix C of this RtS
	• The assessment of sleep disturbance levels has presumably used the LAmax sound power level presented in the NIA at Table 7.1. LAmax noise levels of concern from resource recovery facilities often relate to impact noise from delivery, handling, processing of materials including dropping bins, dropping material into process hoppers etc. The proponent must undertake and present an assessment of existing premises activities and related LAmax noise levels involving material handling to ensure that the LAmax sound power levels considered in the assessment adequately cater for material handling noise. The proponent must include an explanation to justify why sound power levels for plant and equipment used in the assessment will not increase as part of the increase throughput of the Premises. The proponent must objectively account for materials delivery, handling and processing as a noise source for all noise modelling scenarios. The proponent must undertake noise model verification / calibration to demonstrate the accuracy of the noise model. This is particularly relevant (and possible) when dealing with an existing and operational Premises.	Attended noise measurements were undertaken on site for the Supplementary Noise and Vibration Impact Assessment (Appendix C of this RtS). A summary of plant and equipment and relevant sound power levels as updated in the Supplementary Noise and Vibration Impact Assessment is provided in Appendix C. The presented plant and equipment levels are the sound power levels for the plant and equipment operating at maximum output/capacity. As outlined in Section 1.1 of this RtS, the Proposal Site has the capacity to accommodate the increased throughput and will not require any physical works or change to the nature of operations. There will be no changes to the nature or types of equipment used and the presented plant and equipment levels are the sound power levels for the plant and equipment operating at maximum output/capacity. As such the sound power levels will not change. A summary of noise sources including materials delivery and handling and processing for the Proposal, and relevant sound power levels, is provided in Appendix C. These noise sources have been included in the noise modelling for the Supplementary Noise and Vibration Impact Assessment. A verification check for the noise model was undertaken during the recent attended noise measurements on site and was conducted at the boundary of the existing site. The verification check included operation of all daytime plant items listed in the addendum report	Appendix C of this RtS

Aspect	Issue	Response	Reference
		with the exception of the pre-shredder and one shear, which were not in operation during the site visit. Measured noise levels were found to be within 1dB of the modelling results, confirming the veracity of the noise model.	
	Additional comments: • Since 25 June 2020, the EPA has received 18 complaints of excessive noise being emitted from the Premises from residents at various locations near to the Premises. The EPA recommends that the proponent carefully outline the noise mitigation measures committed to under existing approvals and whether that mitigation has been appropriately deployed as well as any other planned noise mitigation measures for the Premises.	The results of the Supplementary Noise and Vibration Impact Assessment (refer to Appendix C of this RtS) indicate that noise emissions associated with the Proposal for all receivers comply with relevant project noise trigger levels without any additional noise mitigation measures. Nonetheless, as part of the commitment to continuous improvement and to reflect comments provided within community submissions, Sell & Parker propose to incorporate additional mitigation for noise generated at the Proposal Site. Sell & Parker will raise around 70 linear meters of the existing south eastern noise wall (located on the south eastern boundary of the Proposal Site) by approximately 2.2 metres to provide additional screening to sensitive receivers in the priority area to the east of the Proposal Site. It is understood that the identified complaints were largely made by residents from the area to the south east of the Proposal Site. This has been committed to as a mitigation measure as described in Section 6 of this RtS.	Appendix C of this RtS
2. Air Quality Impact Assessment	The AQIA has omitted the industrial receptors from the assessment of long-term impacts (annual and 24-hour) with the justification that individuals are not expected to be at those locations for a 24- hour period. • Sensitive receptors are defined in the Approved Methods as a location where people are likely to work or reside and that future sensitive receptors should be considered. While the impacts at residential receptors are predicted to be below the Impact Assessment Criteria (IAC), cumulative impacts for 24-hour averages have not been provided for the industrial receptors to evaluate the potential impacts from the proposal at these locations. Incremental impacts for the industrial receptors have been provided (Appendix D and E) which indicate that cumulative impacts would exceed the IAC for PM10 (50 µg/m3)	The submission highlights PM_{10}/$PM_{2.5}$ impact predictions at R10, R11, R12 and R19. As noted in Section 4.1.1 of the Air Quality Assessment (Appendix G of the EIS), receivers R10-R19 (including receivers noted in the submission) are fence-line receiver locations designed to represent the maximum off-site pollutant concentrations. These receivers are not representative of typical community exposure locations. The PM_{10} and $PM_{2.5}$ impacts have been presented for R1-4, R6-8, and R28-33, as the receiver locations at which exposure over the 24-hour averaging periods is considered reasonable. The air quality criteria used in the Air Quality Assessment and Supplementary Air Quality Assessment (Appendix D of this RtS) include two components	Appendix G of the EIS Appendix D of this RtS

Aspect	Issue	Response	Reference
	and PM2.5 (25 µg/m3) for numerous industrial receptors, with some receptors above the IAC for the incremental impact alone: – Incremental 24-hour PM10: 60.3 µg/m3 (R11), 42.9 µg/m3 (R10), 40.8 µg/m3 (R12), 36.1 µg/m3 (R19); and – Incremental 24-hour PM2.5: 9.4 µg/m3 (R11), 6.8 µg/m3 (R10), 6.3 µg/m3 (R12), 5.6 µg/m3 (R19). The proponent must include the industrial receptors in the complete assessment of air quality impacts. Any predicted exceedances of the IAC must be addressed and all existing and any proposed mitigation measures should be benchmarked against industry best practise.	1. a concentration limit 2. an averaging period. This approach is adopted to account for whether the pollutant may produce an ill-health effect over acute (short-term) and/or chronic (long-term) time frames. The 1-hour NO_X predictions have been presented at R1-33 inclusive, as it is considered reasonable that 1-hour exposure may occur at non-residential locations. To evaluate risk at locations of exposure less than the averaging period used for PM (24-hours) (i.e. at industrial receivers), would require a time-weighted average approach, for predictions over an 8-hour working day to enable comparison with a corresponding 8-hour criterion. However, short-term PM criteria representative of an 8-hour working day are not available. The 24-hour PM_{10} and $PM_{2.5}$ criteria may be adjusted through an approach consistent with EPAV (2013)[2]: to allow assessment of shorter-term exposure rates. The adjustment comprises c(t) = c(to)(to/t)0.2, where: • c = criterion • t = averaging period (in this instance 8-hrs) • t_o = averaging period (in this instance 24-hrs) When adjusted the equivalent criterion over an 8-hr averaging period would be: • **PM_{10}** $50\times(24/8)^{0.2} = 62.3$ µg·m^{-3} • **$PM_{2.5}$** $25\times(24/8)^{0.2} = 31$ µg·m^{-3} This adjustment is a published and commonly adopted methodology. There will be no exceedances of the adjusted criteria when compared to the predicted cumulative impacts at R10, R11, R12 and R19.	

2 https://www.epa.vic.gov.au/about-epa/publications/1551

Aspect	Issue	Response	Reference
		Existing control measures are outlined in Section 7.3 of the Air Quality Assessment and are implemented in accordance with the current EPL11555.	
	There is uncertainty in the meteorological conditions being appropriately considered in the assessment which could influence with dispersion of emissions, potentially changing the results and conclusions of the assessment. • The meteorology data from the Prospect AQMS was analysed to determine the representative year as it is considered to most likely represent the conditions at the Premises based on proximity and lack of significant topographical features between the two locations. This is despite the 2015 assessment (ERM, 2015) sourcing the meteorological data from Horsley Park AWS. Site representative meteorological data was generated using TAPM but did not assimilate the Prospect meteorological data. The AQIA also states this was done in the absence of any measured onsite meteorological data. The AQIA has not evaluated the model generated meteorological data, however the EPA advise that the actual meteorological data from Prospect and the TAPM generated site-specific meteorological data appear to be significantly different. The wind fields and percentage of calms are particularly inconsistent between the two data sets. These inconsistencies would influence with dispersion of emissions, potentially changing the results and conclusions of the assessment. Further, the proponent is required to conduct weather monitoring onsite, including for wind speed and direction. Although the AQIA states there is no onsite meteorological monitoring, the AQIA includes meteorological from the onsite weather station in Table 12. The proponent must undertake quality assurance of the collected onsite meteorological data to evaluate the suitability of assimilating the onsite meteorological data in the model. Where onsite data is suitable, it must be incorporated into TAPM/CALMET to generate the meteorological data or alternatively used to validate the model generated data. The EPA recommends extracting CALMET data at Prospect to evaluate the validity of the model generated data.	Weather monitoring is undertaken on site in accordance with EPL11555. The on-site meteorological data were reviewed as part of the process, and the data were observed to include small-scale variance in wind conditions likely caused by buildings and structures proximate to the Automatic Weather Station (AWS). While useful for providing day-to-day dust control and management, it was not suitable for inclusion in the meteorological modelling exercise. In absence of suitable onsite meteorological data, site representative meteorological data for the Proposal was generated using the TAPM meteorological model in a format suitable for using in the CALPUFF dispersion model. To confirm its suitability for use this was validated against the Horsley Park AWS (as utilised in the 2015 assessment). Appendix E of this RtS presents validation of the TAPM predictions against Horsley Park AWS. The validation is considered to perform well and is considered compliant with the method specified in the Approved Methods. It is considered that the selection, processing, and validation of the meteorological data is in compliance with the Approved Methods and performs well. Further validation against Prospect AQMS is not considered to be warranted.	Appendix G of the EIS Appendix D of this RtS

Aspect	Issue	Response	Reference
	It is not clear whether the assumed operations and emissions in the AQIA are representative of normal operations or a worst-case scenario and how the increased throughput will be handled at the facility. • The single scenario presented in the AQIA has used a pro-rata of operations from the assessment prepared for the original approval (ERM, 2015). The AQIA must be able to be viewed on its own merits and in a stand-alone context. The AQIA has attempted consistency with the previous assessment (ERM, 2015) however the EPA cannot infer the approach of the assessment to understand if the worst-case scenario has been appropriately assessed and how the 600,000 tonnes would be processed at the site with there being no clear process description of how the current 350,000 tpa or proposed 600,000 tpa are distributed through the site. For example, Appendix C of the AQIA includes a table that gives activity rates in tonnes per day for each source location. The EPA has calculated that all the material handling activities amount to 11,022 tonnes per day and 4,023,030 tpa (assuming average distribution). The source MH08 (transferring scrap from stockpile onto hammermill conveyor) has an activity rate of 1800 tonnes per day, with 6 days of operation a week giving an annual activity rate at this source alone of 561,600 tonnes. MH09 (the same activity description as MH08) has the same daily and therefore annual activity rate, implying that these two sources have over 1 million tonnes of material pass through annually. The understands that while day-to-day activities may be variable, the AQIA should provide a clear description of activities occurring at the facility and how the increased throughput of material will be handled. The proponent must present and adequately justify that a worst-case scenario has been assessed and if it has not, undertake such an assessment. The proponent must detail how the facility is capable of handling the increased throughput, particularly in light of no additional works being conducted to facilitate the increase.	The Supplementary Air Quality Assessment (Appendix D of this RtS) has re-estimated emissions based on data derived from Table 2-3 of the EIS, which represents the maximum operational capacity and operating hours of each process component. This is considered a worst-case scenario as it assesses each item of processing equipment operating at 100% capacity. In reality, this equipment will be operating at less than 80% of its maximum processing capacity. For example, the shredder (hammermill) has a maximum hourly operating capacity of 140 $t \cdot hr^{-1}$ and a permissible daily operating period of 15 hours, generating a throughput capacity of 2,100 $t \cdot day^{-1}$. Using this approach, the daily maximum throughput achievable for all processing equipment operating at 100% capacity would be 795,468 $t \cdot year^{-1}$ which is more than the annual throughput threshold of 600,000 $t \cdot year^{-1}$ sought through the Proposal. Given the spare capacity within the existing processing equipment as described above, the increase in plant annual throughput can be achieved through increasing the volume of material received at the Proposal Site and not by increasing plant capacity. A clear process material flow diagram is provided in Figure 2-5 of the EIS. Within the emissions inventory presented in Section 5.2 of the Air Quality Assessment (Appendix G of the EIS), the incoming waste (TRKD01) (2,634 $t \cdot day^{-1}$) represents the maximum daily delivery of materials, which ultimately becomes split into: • *heavy ferrous fraction, bound for the oxy-cutter and shears (total of 384 $t \cdot day^{-1}$)* • *light gauge ferrous fraction which is handled by the pre-shredder and shredder or bypasses the pre-shredder and goes to the shredder (total of 2,100 $t \cdot day^{-1}$)* • *non-ferrous fraction which goes straight to the fully enclosed baler (total of 150 $t \cdot day^{-1}$).* The heavy ferrous material is characterised in the model as MH12 and MH14 (384 t.day-1) transferring the material to the oxy-cutter	Appendix G of the EIS Appendix D of this RtS

Aspect	Issue	Response	Reference
	The proponent must provide a clear linkage between emission sources (Table 14), process (Figure 3), movement of materials onsite, throughput and activity rates. The proponent must include total emissions per year for each activity and as an entire site in the emission inventory.	(9 t·day-1) and Lindemann and Danieli shears (112.5 t·day-1 and 262.5 t·day-1). Processed materials are removed from site at MH10 (1,050 t·day-1) and MH11 (1,050 $t \cdot day^{-1}$). The light gauge material is transferred directly to the shredder through MH2 and MH3 (1,500 $t \cdot day^{-1}$) or via the pre-shredder through MH4 and MH5 (600 $t \cdot day^{-1}$), and subsequently from the pre-shedder to the shredder via MH6 and MH7 (600 $t \cdot day^{-1}$). The total emissions per year for each activity and as an entire site in the emission inventory have been presented in the Supplementary Air Quality Assessment at Appendix D of this RtS.	
	There is uncertainty as to whether the hammermill is meeting current Licence limits. • The AQIA has modelled the hammermill at the emission concentration limits from the Licence, Type 1 and 2 substances (in aggregate) of 1 mg/m3 and TSP of 20 mg/m3. The parameters of the hammermill modelled include a discharge velocity of 25 m/s. Emission concentrations from the hammermill for PM10 and PM2.5 have been given as 47 % and 15%, respectively, of the TSP concentration (Appendix C). No testing data has been provided to support these emission concentrations and parameters despite the requirement for annual testing of TSP on the licence since 2016. Further, the SEARs specifically required evidence that the existing emissions collection system can accommodate the increased throughput. No such evidence is provided in the AQIA. The proponent must provide the emissions testing reports for the hammermill to demonstrate it is achieving compliance and to validate the use of the emission concentrations and parameters in the AQIA. The proponent must provide evidence that the existing infrastructure, including the emissions collection system, can accommodate the proposed increased throughput.	Emission testing reports and emission rates derived from the various emission test reports have been included in the Supplementary Air Quality Assessment (Appendix D of this RtS). The test reports demonstrate compliance with the Emission Concentration Limit Values presented in EPL 11555. The maximum emission rate ($g \cdot s^{-1}$) for each pollutant derived from the emission test reports listed above has been used as the emission rate in the supplementary Air Quality Assessment. Emission conditions (discharge velocity, temperature, etc) are reasonably constant, and the values measured in the most recent available test report have been adopted. It is important to note that the emission test reports include evidence of a cone attached to the discharge point of the Hammermill. The reduction in the discharge diameter increases the discharge velocity of the gas emitted from the Hammermill, and also a marginal (1.2 m) increase in the discharge height. This improvement was not included in the previous Air Quality Assessment (Appendix G of the EIS). The Hammermill and Emission Control System has been designed to manage emissions at a processing rate of 140 $t \cdot hr^{-1}$, which is incorporated into the assessment. Given the hourly capacity of the hammermill and the hourly airflow rate of the ECS will not change for the Proposal, the hourly emissions modelled would not change. The emission test reports demonstrate compliance with EPL 11555 emission concentration limits. The most recent measured TSP	Appendix G of the EIS Appendix D of this RtS

Aspect	Issue	Response	Reference
		concentration (most reflective of current operations) is less than 15 % of the emission limit, and the Type 1 and 2 emissions are less than 1 % of the limit value. This demonstrates that the emission collection system could cope with increased throughput.	
	There is uncertainty in regard to emissions and metal speciation in relation to the hammermill and oxy-cutting activities. • Metal emissions from the hammermill were assumed to be speciated by mass fraction of PM2.5 consistently with that assessed by the USEPA (SPECIATE database). This reflects how the Type 1 and 2 substances (in aggregate) from the hammermill were assessed in the 2015 AQIA (ERM, 2015). However, annual testing of the hammermill for Type 1 and 2 substances (in aggregate) is required by the EPL and has been since 2016. Given there is existing data regarding the emission concentrations of Type 1 and 2 substances (in aggregate) and the metal speciation, the actual emission data should support the assessment of air quality impacts for the proposal as a higher priority than emission factors which are generally averages of all available data and not representative of individual facilities. The proponent must provide the emissions testing reports for the hammermill and where the total and speciated concentrations of Type 1 and 2 substances (in aggregate) differ from those assessed in the AQIA, the AQIA be revised to assess the impacts from actual emissions from the hammermill.	As above	Appendix G of the EIS Appendix D of this RtS
	• The AQIA has not considered or included in the assessment particle or metal emissions from the oxy-cutting activities (Appendix C) as the emissions from the process are considered to be low. The EPA advises that the proponent has been required previously to verify the air emissions from oxy-cutting and the EPA can advise that oxy-cutting is not an insignificant source of particulates from the premises. The proponent must include particulate and metal emissions from oxy-cutting activities in the AQIA.	The emissions estimation and emissions inventory for the oxy-cutting has been updated as part of the Supplementary Air Quality Assessment (refer to Appendix D). It is noted that the emissions inventory includes particulates and all measured metal species (Ag, Al, As, Ba, Be, Ca, Cd, Co, Co[II], Cr, Cu, Fe, Fe[I,II], Hg, K, Li, Mg, Mg[IV], Mn, Mo, Na, Ni, P, Pb, Sb, Se, Sn, Th, Zn) as measured during an emission test during September 2019 (Ref: R007718). Dispersion modelling of these emissions has been included as part of the Supplementary Air Quality Assessment, with results presented in Appendix D of this RtS.	Appendix D of this RtS

Aspect	Issue	Response	Reference
	There is uncertainty as to the emission factors and variables. • The AQIA states that emission factors were sourced from the USEPA's AP42 Chapters 11 and 13. The emission factors for each activity is listed in Appendix C however specific details regarding the emission factors and variables used to calculate the emissions inventory have not been provided. Therefore, the EPA is unable to confirm the emissions from the proposal. The proponent must provide and justify all emission factor equations and variables used to determine the emissions inventory.	The emission inventory and associated variables are presented in Appendix D of this RtS	Appendix D of this RtS
	There is uncertainty as to the source of odour emission concentration data. • Estimated odour concentration and odour emission rates are given in Appendix C for the oxy-cutting and the hammermill. No information as to the source of odour data is provided in the AQIA. The proponent must provide supporting information to evaluate the odour emission rates used in the assessment (oxy-cutting and hammermill).	The odour emission rate for the oxy-cutter used in the Supplementary Air Quality Assessment (Appendix D of this RtS) is derived from test report R00718 (September 2019) which was appended to letter report from ERM (ref: 0462777_L04, dated 19 September 2019). EPA responded to that letter report in January 2020 (ref: DOC20/42792, dated 30 January 2020). The source of the odour emission rate for the hammermill is ERM Waste Metal Recovery, Processing and Recycling Facility Expansion – Air Quality Assessment (ERM, 2015). Note that there are no changes to on-site infrastructure (including the hammermill required as part of the Proposal).	Appendix G of the EIS Appendix D of this RtS
	There is uncertainty regarding current air related pollution controls and proposed air related pollution controls. • The AQIA lists site-specific mitigation measures "to be implemented" to achieve best available techniques. The AQIA also states that the 2015 AQIA (ERM, 2015) presented a list of best practise measures to be implemented. Control factors applied in the modelling appear limited to water sprays on material handling and truck dumping (70 %) and fully enclosed conveyors (100 %). The cyclone and wet scrubber controls on the hammermill are assumed in the emission concentrations for that source. The EPA advise that it is unclear which control and mitigation measures from the 2015 assessment have been put in place, which are still to be implemented and which are additional measures for the current proposal. It is also unclear the potential	The measures outlined in Section 7.3.1 and Section 7.3.2 of the Air Quality Assessment (Appendix G of the EIS) have been implemented on the Proposal Site.	Section 6 of this RtS Appendix G of the EIS

Aspect	Issue	Response	Reference
	impact on the emissions as the AQIA has not discussed the additional controls in reducing offsite impacts. However, it is clear from the results of onsite monitoring presented in the AQIA (Table 11 and 12) that the current operations and controls are not adequately able to reduce particulate concentrations to below relevant criteria. The proponent must clarify existing controls and proposed controls for the site, including time frames for implementation of additional controls.		
	• Further, the predicted impacts for the proposed increase in throughput are likely to exceed the EPA's criteria at multiple receptors which indicate that even with the proposed controls there remains a high risk that impact above the EPA's criteria will occur. The SEARs required the AQIA to consider the feasibility of semi-encapsulation of oxy-cutting activities. The AQIA concludes that the semi-encapsulation of the oxy-cutting is not considered to be practical nor warranted as the emissions from the oxy-cutting are low and impacts are lower than the criteria. As outlined above, this is not the case and consideration to additional enclosures or encapsulation should be considered. The proponent must consider additional control and mitigation measures aimed at ensuring particulate impacts do not exceed the EPA's air quality criteria at receptors. The proponent must assess the impacts from each activity to determine where additional controls may be most effective and considers those controls which may be implemented.	The results of the Supplementary Air Quality Assessment that incorporates the updated emissions data outlined above (i.e. including updates for the hammermill, oxy-cutter, material handling and inclusion of wheel-generated particulates) are presented in Appendix D of this RtS. Consistent with the Air Quality Assessment for the EIS, the background levels for annual average PM2.5 presented in the Supplementary Air Quality Assessment exceed air quality criteria at all receivers. As such, the Proposal does not result in any additional exceedances of relevant air quality criteria. As noted, the background is (in itself) exceeding the air quality criterion and the exceedance is not a result of the Proposal. The incremental annual average PM2.5 predictions are predicted to be 0.1 µg·m-3 or less at all receivers and are considered to be negligible. Source apportionment to assess the impacts from each activity has been undertaken and is presented in Appendix D of this RtS. The top 10 highest incremental (site wide) 24-hour PM_{10} and $PM_{2.5}$ impacts affecting R2 (being the receiver with the highest increments predicted) are presented in Table 17 and 18 of Supplementary Air Quality Assessment (Appendix D of this RtS) respectively. Given the relative contributions of sources is not always constant, Table 3 and 4 of Supplementary Air Quality Assessment present the highest and lowest percentage (%) of the total, noting that this is expressed as a fraction of the respective 24-hour average prediction.	Section 6 of this RtS Appendix D of this RtS Appendix G of the EIS

Aspect	Issue	Response	Reference
		Based upon the source apportionment assessment, it is considered that semi encapsulation of oxy-cutting activities is not warranted nor is it considered operationally practical or common practice. Further encapsulation (either full or semi) will not result in a material change to the anticipated environmental performance of the facility.	

4.3 Environment, Energy and Science Group (EES), Department of Planning, Industry and Environment (DPIE)

A formal submission comprising a letter (dated 14 October 2020) was received from EES. Comments have been summarised in the table below.

Table 4-3: Response to Government Agency submission – Environment, Energy and Science Group

Aspect	Issue	Response	Reference
1. Biodiversity	A Biodiversity Development Assessment Report (BDAR) Waiver Request was approved on 4 December 2019.	Noted – No further action required.	
2. Flooding	EES notes that the flood impact assessment prepared by ARCADIS, dated July 2020 concludes "*that as the proposal is for operational change and existing ground conditions are maintained, no flood impacts are predicted*". EES reviewed a flood impact assessment by CSS dated August 2020, for the adjacent site 57-69 Tattersall Road (SSD 8375). It is noted that there are discrepancies in the 1% AEP existing condition presented in ARCADIS's Figure 7 and CSS's Figure 2. EES recommends that the report should include a map to show the hydraulic categories within the site. Council's Eastern Creek Hydraulic Assessment and the Flood Assessment Report prepared by CSS (August 2020) categorises the site as mostly flood storage area.	As noted, a flood impact assessment was prepared for the Proposal and was included as Appendix J of the EIS. To assess potential flood impacts and define the flood regime within and immediately surrounding the Proposal Site a flood model was developed. The flood model was based on flood modelling developed by Blacktown City Council (Floodplain Planning Study for Eastern Creek) and was refined to provide a better estimate of local flood conditions. Refinements to the flood model included the use of updated lidar survey (2019) and updated site layouts from recently approved modifications. Using the updated flood modelling a map showing the hydraulic categories for the 1% AEP flood within the Proposal Site has been prepared and is included as Appendix A of this RtS. For consistency, the hydraulic category map (Appendix A of this RtS) has been prepared using the same methodology and criteria as Council's Eastern Creek Hydraulic Assessment study. The updated modelling inputs (survey and site plans) as described above accounts for the discrepancy between the council model and the model presented in the EIS. The Proposal hydraulic categories map for the 1% AEP flood model shows there is less flood storage area within the Proposal Site and increased flood fringe area when compared to the Council mapping.	Appendix J of the EIS Appendix A of this RtS
	EES highlights that, the flood impact and risk assessment should adequately outline existing flood behaviour for the full range of flooding up to the Probable Maximum Flood (PMF). ARCADIS's assessment is limited to the 1% AEP.	As noted in the submission, the flood assessment provided as Appendix J of the EIS simulated the 1% AEP. To assess potential flood impacts and define the flood regime within and immediately surrounding the Proposal Site a flood model was developed. The flood model was based on flood modelling developed by Blacktown City Council (Floodplain Planning Study for Eastern Creek) and was	Appendix J of the EIS Appendix A of this RtS

Aspect	Issue	Response	Reference
		refined to provide a better estimate of local flood conditions. Refinements to the flood model included the use of updated Lidar survey (2019) and updated site layouts from recently approved modifications. The modelled floodwater depths and levels (as shown in Figure 7 of Appendix J of the EIS and the updated Figure 7 in Appendix A of this RtS) are very similar to those presented within Council's 2014 floodwater depths and levels (as presented in Figure 7.6 of Blacktown Council's Floodplain Planning Study for Eastern Creek). This shows that the flood model refinement did not materially change the 1% AEP flood levels through the Proposal Site. Similarly, the 1% AEP flood hazard of the Proposal Site (shown in Figure 8 of Appendix J of the EIS) is also very similar to the 1% AEP Council's 2014 flood hazard (as presented in Figure 11.6 of Blacktown Council's Floodplain Planning Study for Eastern Creek), with both showing low hazard classifications. These similarities indicate that the 1% AEP flood regime is relatively insensitive to the additional flood model refinements undertaken as part of the Flooding Assessment for the EIS. As the Probable Maximum Flood (PMF) is a more extreme flood event than the 1% AEP it is less affected by minor adjustments to topography as a result of increase overall flood volumes. Therefore, it is very unlikely that the PMF flood regime would be sensitive to the additional flood model refinement undertaken for the EIS assessment. As such, the PMF flood hazard shown in Council's 2014 model (as presented in Figure 12.6 of Blacktown Council's Floodplain Planning Study for Eastern Creek) can be considered a reasonable representation of the PMF on the Proposal Site and further modelling for the PMF is not warranted.	
	The Eastern Creek Hydraulic Assessment prepared by CSS, dated 2014 shows the site is largely inundated in the PMF event and classified high hazard. Accordingly, consideration should be given to the emergency management of the site during rarer events up to the PMF to ensure the safety of the workers and users of the site.	As required by mitigation measure 5A (refer to Section 6), flood response on the Proposal Site will be undertaken in accordance with the Early Warning Flood Readiness Plan (as part of the Emergency Response Plan). The implementation of this plan will ensure the safety of workers and users of the Proposal Site during a flood event.	Section 6 of this RtS

Aspect	Issue	Response	Reference
	Further EES recommends that Figure 5 will need to be updated with a legend of elevation and Figure 7 with contours of floodwater levels.	Figure 5 of Appendix J of the EIS (Extent of 2019 Lidar Adopted in Flood Model) has been updated to include a legend of elevation and has been included in Appendix A of this RtS. Figure 7 of Appendix J of the EIS (Flood Depth and Level, 100-year ARI event) has been updated with contours of floodwater levels and has been included in Appendix A of this RtS.	Figure 5 of Appendix J of the EIS Figure 7 of Appendix J of the EIS Figure 5 and 7 of Appendix A of this RtS

4.4 Transport for NSW (TfNSW)

A formal submission comprising a letter (dated 20 October 2020) was received from TfNSW. Comments have been summarised in the table below.

Table 4-4: Response to Government Agency submission – Transport for NSW

Aspect	Issue	Response	Reference
1. **Heavy Vehicle Movements**	The Traffic and Transport Impact Assessment (TTIA), identifies that the existing development that includes approval for processing up to 350,000 tonnes per annum (tpa), generates 247 heavy vehicles and 51 light vehicles per day. However Table 3.1 only includes traffic movements related to material received from customers and from internal transfers, and doesn't provide any heavy vehicle movements related to outbound processed material. The TTIA states that for the year up to 19 April 2020, outbound processed material was 345,056 tonnes. Similarly, the TTIA identifies 424 heavy vehicle movements and 89 light vehicle movements generated for the site to process the proposed new throughput of 600,000 tpa. Similar to the issue identified above for Table 3.1, it appears that Table 5.2 does not include estimate for heavy vehicle movements related to outbound processed material. <u>Recommendation:</u> It is requested that the above issue be clarified and if required the TTIA be revised.	To assess potential traffic and transport impacts associated with the Proposal, a Traffic and Transport Impact Assessment (TTIA) has been prepared (Appendix E of the EIS and summarised in Section 7 of the EIS). Table 3.1 of the TTIA provides an overview of the materials and processing throughput for 350,000 tpa. Within Table 3.1, incoming waste material is marked as "Total Material Delivered from Customers" and "Total Material Delivered from Internal Transfers". Outgoing processed material is marked as 'Floc and Shred' which will be transported off-site via truck and dog or semi trailer. As such, the "Total Material Delivered" column for Floc and Shred has been denoted as "Not Applicable". Floc and Shred vehicles (transporting outgoing product) have been included in the count of heavy vehicles generated by the facility in the far right-hand column. As shown, there will be 54 daily 'Floc and Shred' movements related to outgoing processed material. Similarly, outgoing vehicle movements for the proposed throughput of 600,000 tpa are outlined in Table 5.2 of the TTIA. As shown, there will be 92 vehicles transporting 'Floc and Shred' daily.	Appendix B of this RtS
	The TTIA appears to contain some inconsistencies in the number of heavy vehicle turn movements presented in Figures 3.5-3.7 vs Table 5.3 of the report (for example: Saturday Peak: Outbound heavy vehicles shown in Figure 3.7 as 6 vs 8 in the report). <u>Recommendation:</u> It is requested that the TTIA be revised to clarify the consistency of the volumes presented in the Figures vs the Tables.	Figures 3.5 to 3.7 of the TTIA (Appendix E of the EIS) show existing traffic volumes on the local road network during peak periods. Vehicle turn movements were erroneously transcribed in Table 5.3 of the TTIA. Accordingly, Table 5.3 has been updated to reflect the correct vehicle movements associated with the proposed development and is included in Appendix B of this RtS (Table 1 - Traffic Generation Net Change).	Appendix B of this RtS Section 7.2 of the EIS Appendix E of the EIS

Aspect	Issue	Response	Reference
		It is noted that the high volume of light vehicle movements in the weekday AM peak (inbound), weekday PM peak (outbound) and Saturday midday peak (outbound) are due to shift change-over times for staff. The light vehicle movements associated with staff travelling to/from the Proposal Site for their shift will not change as the total number of staff will be maintained in accordance with the Original Approval, as mentioned in Section 4.3 of the TTIA for the Proposal. Accordingly, the SIDRA modelling has been updated with the revised results summarised in Table 2 to Table 4 (Appendix B of this RtS). Overall, the modelling results indicate the intersections operate similarly to the level of service as assessed within the EIS for the Proposal.	
2. Employee Transport Plan	Section 7 of the TTIA provides a framework for the preparation and monitoring of an Employee Transport Plan, and states that the Site Operator would consider the development and implementation of an Employee Transport Plan. The recommendations below are provided to encourage the use of sustainable transport to the site, which will help reduce the use of single vehicle trips. <u>Recommendation:</u> It is requested that prior to the issue of the first Occupation Certificate, the applicant be conditioned to prepare a comprehensive Employee Transport Plan in consultation with TfNSW to reduce the proportion of single-occupant car travel and increase the use of sustainable modes of transport including car sharing, public transport and active transport associated with the development. It is suggested that the plan should specify matters including, but not limited to, the following: • Identifying and implementing strategies that encourage modal shift as presented in Section 7.4 of the TTIA; • Include a strategy for communicating the Employee Transport Plan with staff and visitors and encouraging them to subscribe to its actions;	Sell & Parker has no objection to the preparation of an Employee Transport Plan prior to issue of an Occupation Certificate. The plan would be prepared in consultation with Transport for NSW. This has been included as a mitigation measures in Section 6 of the RtS.	

Aspect	Issue	Response	Reference
	• Ensuring pedestrian and cycling connectivity, end of trip facilities and bicycle parking in order to achieve the above outcomes; • Identifying the party or parties responsible for delivery and implementation of each element of the Employee Transport Plan; and • Including a high quality Travel Access Guide (TAG) which provides information to staff about how to travel to the site by sustainable transport modes. This should include information about public transport connectivity, end of trip facilities, and local pedestrian and cycling connections. Additionally, it is recommended that the Employee Transport Plan is evaluated (including staff travel surveys) and updated every two years. The applicant is to submit a copy of the final Employee Transport Plan to Transport for NSW for consideration.		

4.5 Fire & Rescue NSW (FRNSW)

A formal submission comprising an email (dated 15 October 2020) was received from FRNSW. Comments have been summarised in the table below.

Table 4-5: Response to Government Agency submission – Fire & Rescue NSW

Aspect	Issue	Response	Reference
Fire Safety and Management	FRNSW have reviewed the documentation that was provided in support of the development and provide the following comments and recommendations for your consideration: • .	Noted. A further fire management stockpile plan has been attached at Appendix G following feedback from FRNSW.	
	• FRNSW note that screening under SEPP33 was conducted and the site is deemed potentially hazardous or offensive. As per page 73 of the EIS report "*The assessment found no potentially hazardous or dangerous goods would be stored on-site that would exceed the prescribed thresholds outlined in Applying SEPP 33, and that a PHA was not required for the Proposal*".	Noted. In response to comments on the EIS a full review and rationalisation of potentially hazardous materials and dangerous goods stored on Proposal Site has been undertaken. Arriscar were engaged to undertake a preliminary risk screening (as described in DPIE's Applying SEPP 33 guidelines) and a Preliminary Hazard Analysis (PHA). These have been included as Appendix J of the RtS. The assessment found that the Proposal complies with DPIE's quantitative and qualitative risk criteria for land use safety planning and included several recommendations based on the findings of the risk assessment. These recommendations have been incorporated as mitigation measures for the Proposal.	
	• FRNSW recommend that the current Emergency Response Plan (ERP) be updated to include the expansion to on-site operations and stockpile locations.	Subject to determination, the existing Operational Environmental Management Plans for the Proposal Site (including the Emergency Response Plan (ERP)) will be updated to reflect change to on-site operations and stockpiles (if any).	Section 6 of this RtS
	• It is recommended that an emergency services information package (ESIP) be developed for the site and access to this document be provided to emergency service	An emergency services information package (ESIP) has been prepared for the Proposal Site.	

Aspect	Issue	Response	Reference
	organisations. https://www.fire.nsw.gov.au/gallery/files/pdf/guidelines/guidelines_ESIP_and_TFP.pdf	The package will be updated to reflect the Proposal and provided to relevant emergency service organisations.	
	• FRNSW recommend all of the identified non-compliance issues be rectified as per page 8 of the Sparks and Partners, Fire Hydrant Assessment Report dated 15th June 2020, 20100_Fire Hydrant Assessment Report_Rev2, (5.1 to 5.17).	Sell & Parker are undertaking an upgrades program to address non-compliances related to fire infrastructure as identified within the Fire Hydrant Assessment Report (Appendix K of the EIS). This would be complete prior to operation of the Proposal and would be documented in a Fire Hydrant Close Out Report.	

4.6 Crown Lands

A formal submission comprising an email (dated 7 October 2020) was received from Crown Lands. Comments have been summarised in the table below.

Table 4-6: Response to Government Agency submission – Crown Lands

Aspect	Issue	Response	Reference
Crown Land	No Crown land is directly incorporated into the proposal. Breakfast Creek is partially Crown land traversing the area, care should be taken to ensure that any future works incorporate measures for environmental protection of the creek.	As described in Section 4.1 of the EIS, the Proposal will not require the construction of any new infrastructure. There would be no direct impact on Crown Lands. The existing Proposal Site water management system (WMS) will be utilised during operation of the Proposal. The existing WMS is principally based on separating “clean” run-off from “dirty” run-off. There is no discharge of water from the Proposal Site operational areas to Breakfast Creek and the Proposal would not alter this approach. Clean run-off from roofed areas and the front carpark (clean water areas and rainfall run-off) at the Proposal Site is the only water to discharge into Breakfast Creek. This will not impact on the environmental quality of the creek.	Section 4.1 of the EIS Section 10.2.3 of the EIS, Section 10.2.4 of the EIS, and Appendix I of the EIS (Stormwater Management Assessment)

4.7 Sydney Water

A formal submission comprising a letter (dated 5 November 2020) was received from Sydney Water. Comments have been summarised in the table below.

Table 4-7: Response to Government Agency submission – Sydney Water

Aspect	Issue	Response	Reference
Water servicing	Indicative water balance indicates negligible increase in PW demands. Fronts a 100mm and 300mm main in Tattersall Road which are supplied from a 900mm trunk main located 180m west of the site in Vardys Road.	Noted.	
Wastewater servicing	The site has multiple connection points to multiple sewer mains servicing the site which discharge to 525 trunk mains. Detailed requirements will be provided at the Section application phase.	A water balance has been prepared for the Proposal and is included in Appendix I of the EIS (Water Management Assessment) and summarised in Section 10 of the EIS. The Water Management Assessment has been updated in response to a review of the water management infrastructure on the Proposal Site. Updates have been made to catchment sizes and yard detention storage. The updated Water Management Assessment is included as Appendix H of this RtS. Water balance calculations estimated that 8 kL/day on average will be discharged to the sewer during operation of the Proposal. This is substantially less than the 173 kL daily average licenced the Sydney Water Trade Wastewater Agreement (39940). Prior to commencement of operations the requirement for a Section 73 Compliance Certificate will be determined in consultation with Sydney Water.	Section 10 of the EIS and Appendix I (Water Management Assessment) Appendix H of this RtS
Critical assets	Sydney Water notes there are multiple 525mm trunk wastewater mains traversing the site. Due to the significance of this asset, please ensure the proponent follows the Building Plan Approval process (Tap in).	As detailed in Section 4 of the EIS, the Proposal is operational (processing) only and does not require the construction or operation of any new infrastructure. There will be no potential for impact to wastewater mains and as such, assessment in accordance with the Building Plan Approval process (Tap in) is not considered to be required.	Section 4 of the EIS

4.8 Natural Resources Access Regulator

A formal submission was received from the Natural Resources Access Regulator (NRAR). No comments were received as part of the submission.

5 RESPONSE TO COMMUNITY AND ORGANISATION SUBMISSIONS

5.1 Community submissions

This section provides a summary of the submissions raised by the community. Submissions received from the community have been grouped and responded to by environmental aspect and sub-aspect within Table 5-1. A summary of the key issues raised has been provided in Section 3 of this RtS.

Mitigation to address these comments raised by the community will be discussed in Section 6.

Table 5-1 has been broken down into each aspect, sub-aspect. Each aspect has been separated into existing comments that relate to current concerns from the community and comments specifically related to the Proposal and the EIS.

Table 5-1: Community submission responses

Aspect	Sub-aspect	Summary	Response	EIS and appendices reference
Noise and vibration				
Existing operation comments	*Potential sleep Disturbance*[3]	*Existing noise has caused sleep disturbance for surrounding residents at night-time*	A Noise and Vibration Impact Assessment, including an assessment of sleep disturbance has been prepared for the Proposal and is included as Section 9 and Appendix H of the EIS. A Supplementary Noise and Vibration Impact Assessment (refer to Appendix C) has also been prepared to address specific issues in this RtS. The assessment compared modelled noise levels during the night-time period (10pm to 7am) with the sleep disturbance criteria established in accordance with the NSW EPA's 'Noise Policy for Industry' (NPfI). The assessment found that the Proposal is predicted to comply with the established criteria at all residential receiver locations. As detailed in Section 4.3.5 of the EIS material processing hours for the Facility are 6am to 9pm Monday to Saturday (no processing on public holidays) operational activities during the night-time period (10pm to 7am) primarily consist of maintenance and cleaning. As identified through the Supplementary Noise and Vibration Impact Assessment potential noise impacts during operation of the Proposal, can continue to be managed successfully through existing mitigation measures, identified for the Original Approval (SSD-5041) including the current Noise Management Plan. It is noted that the Supplementary Noise and Vibration Impact Assessment (refer to Appendix C of this RtS) concludes that noise emissions from the Proposal for all receivers comply with relevant project noise trigger levels without any additional noise mitigation measures. Nonetheless, as part of the commitment to continuous improvement and to reflect comments provided within community submissions, Sell & Parker propose to incorporate additional mitigation for noise generated at the Proposal Site. Sell & Parker will raise around 70 linear meters of the existing south eastern noise wall (located on the south eastern boundary of the Proposal Site) by approximately 2.2 metres to provide additional screening to sensitive receivers in the priority area to the east of the Proposal Site. This has been committed to as a mitigation measure (Section 6 of this RtS).	Section 4.3.5, 9.3 and Appendix H of the EIS Appendix C of this RtS
	Shredder	Existing noise and vibration impacts	The Noise and Vibration Impact Assessment (Appendix H of the EIS), including consideration of noise and vibration from the shredder, has been prepared for the Proposal and is included as Section 9 and Appendix H of the EIS. A Supplementary	Section 9.3.2 and Appendix H of the EIS

[3] Comments in italics represent community concern of operations that may not specifically represent the Kings Park RRF Expansion Proposal or current site operations.

Aspect	Sub-aspect	Summary	Response	EIS and appendices reference
		specifically related to the shredder	Noise and Vibration Impact Assessment (refer to Appendix C) has also been prepared to address specific issues in this RtS. To identify potential noise impacts from the Proposal at nearby sensitive receivers, a noise model was developed using sound power levels determined based on previous on-site measurements and data from similar projects. The noise modelling identified that predicted noise levels during operation of the Proposal will comply with the noise established criteria at all sensitive receivers' locations (see Appendix C). Nonetheless, as part of the commitment to continuous improvement and to reflect comments provided within community submissions, Sell & Parker propose to incorporate additional mitigation for noise generated at the Proposal Site. Sell & Parker will raise around 70 linear meters of the existing south eastern noise wall (located on the south eastern boundary of the Proposal Site) by approximately 2.2 metres to provide additional screening to sensitive receivers in the priority area to the east of the Proposal Site. This has been committed to as a mitigation measure as described in Section 6 of this RtS. Vibration levels during operations were quantified for the existing plant with the greatest potential vibration impacts. In order to quantify these levels, attended vibration measurements were undertaken for the hammer mill and metal shear. The vibration assessment found that vibration levels from the operation of the Proposal will comply with the applicable vibration criteria at the nearest receivers. During operation of the Proposal, potential noise and vibration impacts will continue to be managed through existing mitigation measures, identified for the Original Approval (SSD-5041) including the current Noise Management Plan.	Appendix C of this RtS
Comments associated with Proposal	Morning and evening operations	Potential for increases to noise within operating hours, weekday (mornings and night-time) and weekends	A Noise and Vibration Impact Assessment has been prepared for the Proposal and is included as Section 9 and Appendix H of the EIS. A Supplementary Noise and Vibration Impact Assessment (refer to Appendix C) has also been prepared to address specific issues in this RtS. The assessment compared modelled noise levels during the day (7am to 10pm) and night-time periods (10pm to 7am) with the noise criteria established in accordance with the NSW EPA's 'Noise Policy for Industry' (NPfI). The assessment found that the Proposal is predicted to comply with the established criteria at all residential receiver locations. As detailed in Section 4.3.5 of the EIS material processing hours for the Facility are 6am to 9pm Monday to Saturday (no processing on Sunday or public holidays). Operational	Section 2.5.1, 9.3 and 9.4 and Appendix H of the EIS Appendix C of this RtS
	General operations	Potential for increases to general		

Aspect	Sub-aspect	Summary	Response	EIS and appendices reference
		operational noise impacting residents in surrounding communities	activities during the night-time period (10pm to 7am) primarily consist of maintenance and cleaning. During operation of the Proposal, potential noise impacts will continue to be managed through existing mitigation measures, identified for the Original Approval (SSD-5041) including the current Noise Management Plan. It is noted that the Supplementary Noise and Vibration Impact Assessment (refer to Appendix C of this RtS) concludes that noise emissions from the Proposal for all receivers comply with relevant project noise trigger levels without any additional noise mitigation measures. Nonetheless, as part of the commitment to continuous improvement and to reflect comments provided within community submissions, Sell & Parker propose to incorporate additional mitigation for noise generated at the Proposal Site. Sell & Parker will raise around 70 linear meters of the existing south eastern noise wall (located on the south eastern boundary of the Proposal Site) by approximately 2.2 metres to provide additional screening to sensitive receivers in the priority area to the east of the Proposal Site. This has been committed to as a mitigation measure as described in Section 6 of this RtS.	
	Health concerns	Anxiety, stress and quality of life impacts for residents associated with potential operational noise increases	A Noise and Vibration Impact Assessment, including has been prepared for the Proposal and is included as Section 9 and Appendix H of the EIS. A Supplementary Noise and Vibration Impact Assessment (refer to Appendix C) has also been prepared to address specific issues in this RtS report. The assessment compared modelled noise levels during the day (7am to 10pm) and night-time periods (10pm to 7am) with the noise criteria established in accordance with the NSW EPA's 'Noise Policy for Industry' (NPfI). The assessment found that the Proposal is predicted to comply with the established criteria at all residential receiver locations. Nonetheless, as part of the commitment to continuous improvement and to reflect comments provided within community submissions, Sell & Parker propose to incorporate additional mitigation for noise generated at the Proposal Site. Sell & Parker will raise around 70 linear meters of the existing south eastern noise wall (located on the south eastern boundary of the Proposal Site) by approximately 2.2 metres to provide additional screening to sensitive receivers in the priority area to the east of the Proposal Site. This has been committed to as a mitigation measure as described in Section 6 of this RtS. As the Proposal is not anticipated to exceed the established noise criteria, impacts to health and amenity are not anticipated.	Section 9.3 and 9.4 of the EIS Appendix C of this RtS

Aspect	Sub-aspect	Summary	Response	EIS and appendices reference
			During operation of the Proposal, potential noise impacts will continue to be managed through existing mitigation measures, identified for the Original Approval (SSD-5041) including the current Noise Management Plan.	
	Mitigation	Noise mitigation measures detailed in the EIS not considered sufficient based upon the current noise levels experienced by residents	A Noise and Vibration Impact Assessment, including has been prepared for the Proposal and is included as Section 9 and Appendix H of the EIS. A Supplementary Noise and Vibration Impact Assessment (refer to Appendix C) has also been prepared to address specific issues in this RtS report. To identify potential noise impacts from the Proposal at nearby sensitive receivers, a noise model was developed. The noise modelling identified that predicted noise levels during operation of the Proposal will comply with the established noise criteria at all sensitive receiver locations (see Table 7.4 of Appendix C) Nonetheless, as part of the commitment to continuous improvement and to reflect comments provided within community submissions, Sell & Parker propose to incorporate additional mitigation for noise generated at the Proposal Site. Sell & Parker will raise around 70 linear meters of the existing south eastern noise wall (located on the south eastern boundary of the Proposal Site) by approximately 2.2 metres to provide additional screening to sensitive receivers in the priority area to the east of the Proposal Site. This has been committed to as a mitigation measure as described in Section 6 of this RtS. During operation of the Proposal, potential noise and vibrations impacts will continue to be managed through existing mitigation measures, identified for the Original Approval (SSD-5041) including the current Noise Management Plan. Existing acoustic barriers on site include: • 10 metres on the northern boundary along Tattersall road • Between 6 - 4 on the southern boundary • Around 6 - 8 metres on the western boundary • Between 6 – 10 metres on the eastern boundary. As described above, the existing south eastern noise wall (located on the eastern boundary of the Proposal Site) will be raised by approximately 2.2 metres to provide additional screening to sensitive receivers in the priority area to the east of the Proposal Site. This has been committed to as a mitigation measure as described in Section 6 of this RtS.	Section 9.3 and 9.4 and Appendix H of the EIS Appendix C of this RtS
	Acoustic barrier	An acoustic/ sound barrier should be erected 15-20 m high eastern and southern perimeter of the Proposal site		
	Community solution	Either compensation or a solution should be provided to residents for potential noise impacts by the Proposal		

Aspect	Sub-aspect	Summary	Response	EIS and appendices reference
	Monitoring	Noise monitoring should be undertaken around the Proposal site and east of Sunnyholt Road and surrounding residential areas. The community should have access to these monitoring records.	A Noise and Vibration Impact Assessment has been prepared for the Proposal and is included as Section 9 and Appendix H of the EIS. A Supplementary Noise and Vibration Impact Assessment (refer to Appendix C) has also been prepared to address specific issues in this RtS report. The Supplementary Noise and Vibration Impact Assessment (refer to Appendix C) has included additional long term noise monitoring at four locations between 11 February and 24 February 2021 to determine the overall single L_{A90} Rating Background Levels (RBL) and representative ambient L_{eq} noise levels for each assessment period in accordance with the NSW 'Noise Policy for Industry' (NPfI). The results of this monitoring are presented in Appendix C. The project noise trigger Levels and sleep disturbance criteria have been updated based on the more recent monitoring data. Notwithstanding the updated project noise trigger levels and sleep disturbance criteria noise emissions for all receivers comply with relevant project noise trigger levels without any additional noise mitigation measures. Nonetheless, as part of the commitment to continuous improvement and to reflect comments provided within community submissions, Sell & Parker propose to incorporate additional mitigation for noise generated at the Proposal Site. Sell & Parker will raise around 70 linear meters of the existing south eastern noise wall (located on the south eastern boundary of the Proposal Site) by approximately 2.2 metres to provide additional screening to sensitive receivers in the priority area to the east of the Proposal Site. This has been committed to as a mitigation measure as described in Section 6 of this RtS.	Appendix C of this RtS
	General machinery	Processing capacity will increase associated machinery noise	A Noise and Vibration Impact Assessment, including consideration of noise from the processing machinery, has been prepared for the Proposal and is included as Section 9 and Appendix H of the EIS. A Supplementary Noise and Vibration Impact Assessment (refer to Appendix C) has also been prepared to address specific issues in this RtS report. To identify potential noise impacts from the Proposal at nearby sensitive receivers, a noise model was developed using sound power levels determined based on previous on-site measurements and data from similar projects. A summary of mobile and fixed equipment included in the noise modelling for the Proposal, and relevant sound power levels, is provided in Section 7 of Appendix C (of this RtS).	Section 9.3 and 9.4 and Appendix H of the EIS Appendix C of this RtS

Aspect	Sub-aspect	Summary	Response	EIS and appendices reference
			The noise modelling identified that predicted noise levels during operation of the Proposal would comply with the established noise criteria at all sensitive receiver locations (see Table 7-4 of Appendix C of this RtS). Nonetheless, as part of the commitment to continuous improvement and to reflect comments provided within community submissions, Sell & Parker propose to incorporate additional mitigation for noise generated at the Proposal Site. Sell & Parker will raise around 70 linear meters of the existing south eastern noise wall (located on the south eastern boundary of the Proposal Site) by approximately 2.2 metres to provide additional screening to sensitive receivers in the priority area to the east of the Proposal Site. This has been committed to as a mitigation measure as described in Section 6 of this RtS. During operation of the Proposal, potential noise and vibration impacts would continue to be managed through existing mitigation measures, identified for the Original Approval (SSD-5041) including the current Noise Management Plan.	
	Noise assessment	Five-year-old noise assessment undertaken for EIS does not justify current or future noise levels	The Supplementary Noise and Vibration Impact Assessment (refer to Appendix C of this RtS) has included additional long term noise monitoring at four locations between 11 February and 24 February 2021 to determine the overall single L_{A90} Rating Background Levels (RBL) and representative ambient L_{eq} noise levels for each assessment period in accordance with the NSW 'Noise Policy for Industry' (NPfI). The results of this monitoring are presented in Appendix C of this RtS. The project noise trigger Levels and sleep disturbance criteria have been updated based on the more recent monitoring data. Although the project noise trigger levels and sleep disturbance criteria noise emissions have been updated all receivers comply with relevant project noise trigger levels without any additional noise mitigation measures. Nonetheless, as part of the commitment to continuous improvement and to reflect comments provided within community submissions, Sell & Parker propose to incorporate additional mitigation for noise generated at the Proposal Site. Sell & Parker will raise around 70 linear meters of the existing south eastern noise wall (located on the south eastern boundary of the Proposal Site) by approximately 2.2 metres to provide additional screening to sensitive receivers in the priority area to the east of the Proposal Site. This has been committed to as a mitigation measure as described in Section 6 of this RtS.	Appendix C of this RtS
Air quality and odour				
Existing operation comments	Dust	Dust and dirt blowing off the existing site	An Air Quality Assessment has been prepared in accordance with the SEARs (SSD-10396) and is provided in Appendix G and summarised in Section 8 of the EIS. A Supplementary Air Quality Assessment has been prepared as part of this RtS (Appendix	Section 8 and Appendix G of the EIS

Aspect	Sub-aspect	Summary	Response	EIS and appendices reference
			D of this RtS) in response to stakeholder comments. The Air Quality Assessment as updated by the Supplementary Air Quality Assessment, modelled potential emissions from Proposal-related activities, including a dispersion model to predict concentrations of pollutants at nearby receivers. Model outcomes were then compared to criteria established in accordance with the 'Approved Methods for the Modelling and Assessment of Air Pollutants in NSW' (NSW EPA, 2011). The Air Quality Assessment and Supplementary Air Quality Assessment identified that operation of the Proposal would result in incremental increase in dust deposition of <0.1 g m^{-2} $month^{-1}$. This is well below the criterion of 2.0 g m^{-2} $month^{-1}$. There would also be no exceedances of the annual average dust deposition rate criteria. During operation of the Proposal, dust generation would be managed through existing mitigation measures, identified for the Original Approval (SSD-5041) including the current OEMP, use of water sprays and misting systems, the hammer mill emissions control system, regular use of street sweepers and the use of enclosed conveyors. The air quality management strategies in the current approved OEMP and Air Quality Management Plan (AQMP) will continue to be implemented to reduce air quality impacts as shown in the Air Quality Assessment and Section 8 of the EIS.	Appendix D of this RtS
	Health concerns	Dust that originates from the Proposal site may lead to health or respiratory implications of nearby residents	An Air Quality Assessment has been prepared in accordance with the SEARs (SSD-10396) and is provided in Appendix G and summarised in Section 8 of the EIS. A Supplementary Air Quality Assessment has been prepared as part of this RtS (Appendix D of this RtS) in response to stakeholder comments. The Air Quality Assessment as updated by the Supplementary Air Quality Assessment, modelled potential emissions from Proposal-related activities, including a dispersion model to predict concentrations of pollutants at nearby receivers. Model outcomes were then compared to criteria established in accordance with the 'Approved Methods for the Modelling and Assessment of Air Pollutants in NSW' (NSW EPA, 2011). Air quality criteria are benchmarks set to protect the general health and amenity of the community in relation to air quality. The updated Air Quality Assessment identified that operation of the Proposal would result in incremental increase in dust deposition of <0.1 g m^{-2} $month^{-1}$. This is well below the criterion of 2.0 g m^{-2} $month^{-1}$. There would also be no exceedances of the annual average dust deposition rate criteria. During operation of the Proposal, dust generation would be managed through existing mitigation measures, identified for the Original Approval (SSD-5041) including the current	Section 8.3 and Appendix G of the EIS Appendix D of this RtS

Aspect	Sub-aspect	Summary	Response	EIS and appendices reference
			OEMP, use of water sprays and misting systems, the hammermill emissions control system, regular use of street sweepers and the use of enclosed conveyors. The air quality management strategies in the current approved OEMP and Air Quality Management Plan (AQMP) will continue to be implemented to reduce air quality impacts as shown in the Air Quality Assessment and Section 8 of the EIS.	
	Filtration	*Exhaust air from the incinerator should be filtered*	A description of the operational processes at the Proposal Site is provided in Section 4.3 of the EIS. The Proposal will not involve incineration of any materials.	Section 4.3 of the EIS
Comments associated with Proposal	Low air quality	Potential for decreased air quality as a result of the Proposal	An Air Quality Assessment has been prepared in accordance with the SEARs (SSD-10396) and is provided in Appendix G and summarised in Section 8 of the EIS. A Supplementary Air Quality Assessment has been undertaken to address specific comments in this RtS and incorporates updated emissions data including updates for the hammermill, oxy-cutter, material handling, conveyors, and inclusion of wheel-generated particulates (refer to Appendix D) The air quality models, modelled potential emissions form Proposal-related activities, including a dispersion model to predict concentrations of pollutants at nearby receivers. Model outcomes were then compared to criteria established in accordance with the 'Approved Methods for the Modelling and Assessment of Air Pollutants in NSW' (NSW EPA, 2011). The assessment identified that the Proposal is not predicted to exceed the relevant air quality and odour assessment criteria for odour, dust, particulates, and other pollutants and would not have a significant impact on local air quality and that no additional control or mitigation measures are considered to be warranted. Air quality would continue to be managed through existing mitigation measures, identified for the Original Approval (SSD-5041) including the current Operational Environmental Management Plan (OEMP), use of water sprays and misting systems, the hammer mill emissions control system, regular use of street sweepers and the use of enclosed conveyors. The air quality management strategies in the current approved OEMP and AQMP will continue to be implemented to reduce air quality impacts as shown in the Air Quality Assessment and Section 8 of the EIS.	Section 8.3 and Appendix G of the EIS Appendix D of this RtS

Aspect	Sub-aspect	Summary	Response	EIS and appendices reference
	Mitigation	The proposed air quality mitigation measures detailed in the EIS are not sufficient	An Air Quality Assessment has been prepared in accordance with the SEARs (SSD-10396) and is provided in Appendix G and summarised in Section 8 of the EIS. A Supplementary Air Quality Assessment has been prepared as part of this RtS (Appendix D of this RtS) in response to stakeholder comments. The Air Quality Assessment as updated by the Supplementary Air Quality Assessment, modelled potential emissions form Proposal-related activities, including a dispersion model to predict concentrations of pollutants at nearby receivers. Model outcomes were then compared to criteria established in accordance with the 'Approved Methods for the Modelling and Assessment of Air Pollutants in NSW' (NSW EPA, 2011). The assessment identified that the Proposal is not predicted to exceed the relevant assessment criteria for odour, dust, particulates, and other pollutants and would not have a significant impact on local air quality. As such, no further mitigation measures are considered to be required. Potential air quality impacts would continue to be managed through existing mitigation measures, identified for the original approval (SSD-5041) including the current Operational Environmental Management Plan (OEMP) and the Air Quality Management Plan (AQMP). Section 7.3 of the Air Quality Assessment identifies the best practice measures that are in place and would continue to be implemented for the Proposal. These measures include: • Regularly sweeping of the Proposal Site surface and access routes • Maintenance of enclosed conveyors and conveyor transfer points • Dust suppression through water spray / misting systems • An emissions control system on the hammermill including a cyclone wet scrubber • Waste and product storage to control emissions to atmosphere (regulated through EPL 11555) • Oxy-cutting under wet conditions. An overview of committed mitigation measures is provided in Section 6 below.	Section 8.4 of the EIS Section 6 of this RtS Appendix D of this RtS
	Odours	Potential for increased	An Air Quality Assessment including an assessment of odour impacts has been prepared in accordance with the SEARs (SSD-10396) and is provided in Appendix G and	Section 8 and 12 and

Aspect	Sub-aspect	Summary	Response	EIS and appendices reference
		material handling and resulting odours as a result of the Proposal	summarised in Section 8 of the EIS. A Supplementary Air Quality Assessment has been prepared as part of this RtS (Appendix D of this RtS) in response to stakeholder comments. It is noted that the Proposal would not change the types of waste accepted at the Facility. Odorous waste materials are not accepted at the Proposal Site, how it is acknowledged that oxy-cutting has the potential to give rise to odour emissions. Potential odours emissions were incorporated in the air quality model and assessed against the NSW EPA Odour Technical Framework criteria. The assessment found that operation of the Proposal is not anticipated to result in exceedances of the relevant odour criteria and would not result in significant odour impacts to nearby receivers. During operation of the Proposal, potential air quality impacts, including odour would be managed through existing mitigation measures, identified for the Original Approval (SSD-5041). The air quality management strategies in the current approved OEMP and Air Quality Management Plan (AQMP will continue to be implemented to reduce air quality impacts as shown in the Air Quality Assessment and Section 8 of the EIS.	Appendix G of the EIS Appendix D of this RtS
	Increased emissions from trucks	Potential for increased vehicle emissions from the Proposal	An Air Quality Assessment including consideration of vehicle emissions has been prepared in accordance with the SEARs (SSD-10396) and is provided in Appendix G and summarised in Section 8 of the EIS. A Supplementary Air Quality Assessment has been prepared as part of this RtS (Appendix D of this RtS) in response to stakeholder comments. As described in Section 7.3 of the EIS, the Proposal is expected to result in an increase of 15 hourly vehicles and 215 daily vehicles. The Air Quality Assessment as updated by the Supplementary Air Quality Assessment, modelled emissions from Proposal-related activities, including the additional vehicles movements to predict concentrations of pollutants at nearby receivers. Model outcomes were then compared to criteria established in accordance with the 'Approved Methods for the Modelling and Assessment of Air Pollutants in NSW' (NSW EPA, 2011). The assessment identified that the Proposal, including consideration of emissions from vehicle movements, is not predicted to exceed the relevant assessment criteria for odour, dust, particulates, and other pollutants and would not have a significant impact on local air quality.	Section 7.3 and Appendix G of the EIS Appendix D of this RtS

Aspect	Sub-aspect	Summary	Response	EIS and appendices reference
Traffic and transport				
Existing operation comments	Parking	Potential illegally parked heavy vehicles waiting to access the site within Kings Park industrial estate	A detailed Traffic and Transport Impact Assessment (TTIA) has been prepared for the Proposal in accordance with the SEARs (SSD-10396) and is summarised in Section 7 and included as Appendix E of the EIS. The TTIA identified that operation of the Proposal would generate approximately 513 vehicles per day. An increase of around 15 hourly vehicles and 215 vehicles per day compared to the currently approved operations. The TTIA concluded that there would be no significant change to the existing level of service at key intersections surrounding the Proposal Site, including Sunnyholt Road - Tattersall Road and Sunnyholt Road – Vardys Road intersections. As noted in Section 7 and Appendix E of the EIS, to minimise the potential for trucks parking on Tattersall Road, up to 35 stacking spaces (areas where vehicles can wait to access an operational area of the Proposal Site) would be provided within the Proposal Site. This traffic assessment determined that available on-site stacking spaces can accommodate the traffic generation associated with the Proposal. Under current operations, Sell & Parker manages their internal fleet trucks to minimise the requirement for parking on the Tattersall Road, utilising the ability to accommodate them on site. Sell & Parker fleet trucks are required to comply with a Code of Conduct ensuring that when operating on the Proposal Site or the surrounding road network road rules are maintained and road safety is not compromised. It is understood that some vehicles park legally within the unrestricted parking areas along Tattersall Road prior to the commencement of operations for the Proposal Site and surrounding businesses. As these vehicles are not Sell & Parker fleet trucks (and may not even be destined for the Sell & Parker site), they are outside of Sell & Parker's control. These trucks are parked legally and therefore do not impact on the use or safety of Tattersall Road. The existing OEMP will be updated to reflect the operational changes associated with the Proposal. Mitigation measures previously identified for the Original Approval (SSD-5041) would continue to be implemented for the Proposal as described in the TTIA and Section 7 of the EIS. Overall, the Proposal Site can accommodate the additional vehicles required for the Proposal and any Sell & Parker vehicle would need to comply with the relevant Code of Conduct.	Section 7.3 and Appendix E of the EIS

Aspect	Sub-aspect	Summary	Response	EIS and appendices reference
Comments associated with Proposal	Congestion	Potential for increased congestion within the traffic network including Sunnyholt Road/Tattersall Road/Vardys Road	A detailed Traffic and Transport Impact Assessment (TTIA) has been prepared for the Proposal in accordance with the SEAR's (SSD-10396) and is summarised in Section 7 and included as Appendix E of the EIS. The TTIA identified that operation of the Proposal would generate up to 513 vehicles per day. An increase of around 15 hourly vehicles and 215 vehicles per day compared to the currently approved operations. The TTIA concluded that there would be no significant change to the performance of key intersections surrounding the Proposal Site, including Sunnyholt Road - Tattersall Road and Sunnyholt Road – Vardys Road intersections. Whilst, the Proposal will result in a reduction in LoS at the Sunnyholt Road - Tattersall Road intersection (in the Saturday peak), the additional average delay per vehicle is considered minor (around 10 seconds average delay per vehicle during the Saturday peak and substantially less at other times). This intersection will continue to operate above capacity with or without the Proposal i.e. in the context of background traffic volumes, the contribution from the Proposal is considered negligible. To minimise the potential for traffic impacts on Tattersall Road, up to 35 stacking spaces (areas where vehicles can wait to access an operational area of the Proposal Site) would be provided within the Proposal Site. The traffic assessment identified that, these on-site stacking spaces could accommodate the traffic generation associated with the Proposal. The ability for all vehicles to stack within the Proposal Site would optimise daily operations and minimise queuing on the local road network. The existing Operational Environmental Management Plan (OEMP) will be updated to reflect the operational changes associated with the Proposal. Mitigation measures previously identified for the Original Approval (SSD-5041) would continue to be implemented for the Proposal as described in the TTIA and Section 7 of the EIS.	Section 7 and Appendix E of the EIS
	Heavy vehicles	Potential for additional heavy vehicles queuing near the Proposal site on Tattersall Road, Vardys Road and Sunnyholt Road leading to poor traffic flows		
Processing capacity				
Comments associated with Proposal	Infrastructure	Confusion surrounding no proposed infrastructure and increased processing capacity for the Proposal	A capacity analysis, identifying the maximum and realistic capacity of existing processing machinery has been prepared and is presented in Section 3.4 of the EIS. The analysis found that an increase in throughput to 600,000 tpa would be well within the limits of the existing approved infrastructure, without requiring construction of any additional infrastructure or altering approved operational hours. When operating at 100% capacity (within the approved operational hours) the existing, approved processing plant and equipment on the Proposal Site, could process 795,468 tonnes of material per annum. In reality, plant and equipment cannot operate at 100% capacity as a result of maintenance, stoppages, breakdowns, unexpected events, etc. A	Section 3.4 of the EIS

Aspect	Sub-aspect	Summary	Response	EIS and appendices reference
			conservative estimate of the machinery running at 80% capacity has been adopted. This number has been considered in the context of previous waste infrastructure approvals and has been accepted in principle by DPIE as being reasonable. When running at 80% of processing capacity, the Proposal Site could reasonably expect to process up to 636,374 tpa. As such, an increase in throughput to 600,000 tpa would be within the limits of the existing approved infrastructure, including existing plant and equipment. The efficiency of supporting activities and resources would be increased to facilitate the increase in throughput. Examples of this would include: • Scheduling staff to increase the number of staff present during known peak periods. • Utilising supporting equipment for longer periods of time in the day e.g. using three material handlers for longer periods of the day to load processing equipment. In this way, the Proposal Site can accommodate for the 600,000 tpa throughput construction or change to built form.	
	Processing machinery activities	There is no description of machinery activities during operational hours i.e. 'all other activities' in operational hours table (Section 1.2.1) in EIS	The operation of the Proposal Site would not require a change to the operational hours as approved under SSD-5041 and described in Section 2.5 of the EIS. Standard operational hours for existing approved facility are 6am to 9pm Monday to Saturday (no work on Sunday's or public holidays). Operational processes at the Proposal Site that are undertaken during standard operational hours are provided in Section 2.5 of the EIS. Oxy-cutting activities are limited to the hours of 9am to 3pm Monday to Saturday (no work on Sunday's or public holidays). Cleaning and maintenance activities would occur as required 24 hours a day, seven days a week. This is consistent with the Original Approval (SSD-5041) and no change would occur for the Proposal.	Section 2.5 of the EIS
Hazards and risk				
Existing operation comments	Hazardous materials	Concern of hazardous materials emitted from the existing Proposal site	A review of hazardous materials and chemicals has been prepared in accordance with the SEARs (SSD-10396) and is provided in Section 12 of the EIS. In response to comments on the EIS a full review and rationalisation of potentially hazardous materials and dangerous goods stored on Proposal Site has been undertaken. Arriscar were engaged to undertake a preliminary risk screening (as described in DPIE's Applying SEPP 33 guidelines) and a Preliminary Hazard Analysis (PHA). These have	Section 8.4.2 and 12 of the EIS Appendix J of this RtS

Aspect	Sub-aspect	Summary	Response	EIS and appendices reference
			been included as Appendix J of the RtS. The assessment found that the Proposal complies with DPIE's quantitative and qualitative risk criteria for land use safety planning and included several recommendations based on the findings of the risk assessment. These recommendations have been incorporated as mitigation measures for the Proposal.	
Comments associated with Proposal	Fire	Fire or explosion could occur close to residences as a past fire has in 2010	A description of the fire management infrastructure on the Proposal Site is provided in Section 12 of the EIS. The Fire Hydrant Assessment (Appendix K) identified that the existing fire infrastructure on-site would be able to adequately manage fire risks associated with the Proposal without additional alterations (Appendix K). The current system installed on the Proposal Site is AS 2419.1-2005. The fire management infrastructure has been designed in accordance with the Fire and Rescue NSW (2020) *Fire safety guidelines: Fire safety in waste facilities.* Mitigation measures previously identified for the Original Approval (SSD-5041) would continue to be implemented for the Proposal as described in Section 12 of the EIS. The existing OEMP will be updated to reflect the operational and stockpile changes (if any) associated with the Proposal.	Section 2.4.6 and 12.4.2 of the EIS
General				
Existing operation comments	Industry area	General concern with an industry surrounding close-by residents	As identified in Section 5.3.2 of the EIS, Clause 121 of the *State Environmental Planning Policy (Infrastructure) 2007* makes provision for waste or resource management facilities to be undertaken, with development consent with a 'prescribed zone' being IN1 – General Industrial. The Proposal Site is zoned IN1 General Industrial under Blacktown Local Environmental Plan (LEP) 2015 and as such is permissible with consent. The Proposal Site is consistent with surrounding land uses which are characterised by industrial and commercial development. The Proposal does not require the construction of additional infrastructure and would not change the current land use of the Proposal Site. The Environmental Impact Statement has been prepared in accordance with SSD-10396 to assess potential impacts to sensitive receivers including nearby residential receivers. The assessment found that with the implementation of existing mitigation measures as identified in the Original Approval (SSD-5041) the Proposal would not have a significant impacts to the surrounding environment.	Section 5.4 of the EIS

Aspect	Sub-aspect	Summary	Response	EIS and appendices reference
	Complaints register	Comments raised in Complaints Register on S&P website have not been addressed in the EIS	Complaints identified on the Sell & Parker website generally relate to noise and air quality concerns. The comments raised within the complaints register have been addressed by Sell & Parker directly at the time the complaint was made. This is to ensure the complaint is addressed within an appropriate time period individually for each concern. Complaints are reported to the relevant authorities, where required. Sell & Parker are committed to a program of continual environmental improvement for their business and operational sites. This is reflected through their environmental management system and operational management plans which detail the procedures that form the stages of the continuous improvement cycle as shown in Figure 1-2 of the EIS. As part of their commitment to continual environmental improvement Sell & Parker will continue to engage in Independent Environmental Audits on a 3 yearly cycle and promptly implement any further measures as required. The Environmental Impact Statement has been prepared in accordance with SSD-10396 to assess potential impacts (including noise and air quality) to sensitive receivers including nearby residential receivers. The assessment found that with the implementation of existing mitigation measures as identified in the Original Approval (SSD-5041) the Proposal would not have a significant impacts to the surrounding environment.	Section 6 of the EIS and Appendix G and H
Comments associated with Proposal	Property value	Decreased property value as a result of the Proposal	The Environmental Impact Statement has been prepared in accordance with SSD-10396 to assess potential impacts (including amenity impacts) to sensitive receivers including nearby residential receivers. The assessment found that with the implementation of existing mitigation measures as identified in the Original Approval (SSD-5041) the Proposal would not have a significant impact to the surrounding environment. The Proposal is located in an area zoned IN1 General Industrial under the Blacktown Local Environmental Plan 2015 and the activities are considered to be consistent with this land use zoning.	Sections 7 to 19 of the EIS
	Industry in Western Sydney	General objection to Proposal being located in Western Sydney	A number of alternative scenarios were considered in Section 3.5 of the EIS, including the potential to locate the Proposal at an alternative site. However, the preferred alternative would be to increase operations at the Proposal Site as this option would best address the Proposal objectives while minimising potential impacts associated with the Proposal in that it would: • Increase the volume of scrap metal recycled at the RRF utilising existing approved infrastructure and maximising diversion of scrap metal from landfill	Section 3.3 of the EIS Section 3.5 of the EIS

Aspect	Sub-aspect	Summary	Response	EIS and appendices reference
			• Allow the processing of scrap metal to higher recycling standards prescribed by China's National Sword Policy • Optimise the efficiency of the Proposal Site processes, including vehicle movements and stacking locations • To support continuous improvement in the environmental performance of the Proposal Site. In addition, the Proposal Site is zoned IN1 General Industrial under Blacktown Local Environmental Plan (LEP) 2015. The local area is characterised by industrial and commercial development. The Proposal does not require the construction of additional infrastructure and would not change the current land use of the Proposal Site. Therefore, the Proposal would remain consistent with the objectives of the IN1 zone, is considered to be consistent with surrounding land uses, and is permissible with development consent. A review of the Proposal against relevant strategic planning policies is provided in Section 3.3 of the EIS. Generally, The Western District Plan (WDP) is a strategy that provides growth and development creating an efficient West District by reducing the amount of waste that goes into landfill. The Proposal would support this as it would increase resource recovery rates and minimise the amount of waste that goes to landfill. The Blacktown Local Strategic Planning Statement (LSPS) sets out a 20-year vision for the future of Blacktown City as it grows and changes. The Proposal Site is identified as an employment area within the Blacktown Business Park. The Proposal is consistent with the objectives of the LSPS for the Blacktown Precinct, specifically the Proposal would contribute to Blacktown's productivity by: • Retaining employment land in the Blacktown Precinct, which contributes to one of • The largest concentrations of employment in Greater Sydney • Providing diverse employment in the Blacktown Business Park. The Proposal would contribute to Blacktown's productivity in terms of economic activity and employment around strategic centres identified in the LSPS. The Proposal is considered to be located in a suitable location with similar land uses and is permissible with consent. The Proposal also aligns with relevant strategic planning documents that outline the need to retain employment opportunities and increase resource recovery outcomes in Western Sydney. As such, the location of the site is considered to be suitable.	

Aspect	Sub-aspect	Summary	Response	EIS and appendices reference
	Conditions of Consent	The Proposal does not comply with previous conditions of consent	The Proposal would continue to be regulated by the Department of Planning, Industry and Environment (DPIE) (for compliance with the planning approval) and the NSW Environment Protection Authority (EPA) relating to compliance with the Environment Protection Licence. Sell & Parker are committed to a program of continual environmental improvement for their business and operational sites. This is reflected through their environmental management system and operational management plans which detail the procedures that form the stages of the continuous improvement cycle as shown in Figure 1-2 of the EIS. As part of their commitment to continual environmental improvement Sell & Parker will continue to engage in Independent Environmental Audits on a 3 yearly cycle and promptly implement any further measures as required.	Section 5.2 of the EIS
	Monitoring	Increased and further monitoring required to meet environmental standards set by the EPA	The Environmental Impact Statement has been prepared in accordance with SSD-10396 to assess potential impacts (including amenity impacts) to sensitive receivers including nearby residential receivers. The assessment found that with the implementation of existing mitigation measures as identified in the Original Approval (SSD-5041) the Proposal would not have a significant impact to the surrounding environment. The Proposal Site currently operates with the Environmental Protection Licence (EPL) No.11555. Environmental performance continues to be managed in collaboration with the EPA as detailed in Section 1.2.4 of the EIS.	Section 1.2.4 of the EIS
	Employment opportunities	*Proposal will promote employment opportunities for the community*	Support for the Proposal is noted.	Section 18.3 of the EIS
	Waste liquid	Concern with waste liquid entering the environment from the Proposal site	The existing Proposal Site Water Management System (WMS) will be utilised for the operation of the Proposal. The existing WMS is principally based on separating" run-off from operational areas from run-off from the roof and front carpark. Clean run-off can be defined as roofed areas and the front carpark at the 23-43 Tattersall Road site that is rainfall run-off that flows through a stormwater drainage and is discharged to Breakfast Creek. Any run-off that falls within the operational areas of the existing site is collected by the WMS and is diverted to the floc pit prior to being pumped into the retention basin. This	Section 10.2 and Appendix I of the EIS

Aspect	Sub-aspect	Summary	Response	EIS and appendices reference
			run-off is collected, disinfected and is stored in the aboveground storage tanks for reuse in a closed loop system. A Trade Waste Agreement with Sydney Water (Conditional Consent 39940) is in place for discharge of treated water. An increase in the approved discharge limit would not be required for the Proposal.	
Visual				
Existing operation comments	Visual appearance	Machinery and cranes are visible from neighbouring businesses in Forge Street	The description of the Proposal is provided in Section 4. As identified, the Proposal would not include the provision of any new infrastructure. On site processing infrastructure including machinery and cranes have been assessed and approved under SSD-5041. The Visual Impact Assessment has been provided in Section 17.2 of the EIS. The assessment found that the visual character of the surrounding Proposal Site is strongly influenced by industrial development and large road corridors. The Proposal Site is well fenced and residential property site lines are limited and is not visible from places of recreation. Mitigation measures in place include a number of visual barriers and planted trees (which will continue to grow) are located along the boundary of the Proposal Site (constructed as part of SSD-5041) which screen daily operations from surrounding properties and potential viewpoints.	Section 4 and 17.2 of the EIS
Socio-economic				
Existing operation comments	Local businesses	Businesses in the Kings Park Industrial Estate (Tattersall Road and Forge Street) have experienced havoc for business clientele by the existing site	The Proposal Site is zoned IN1 General Industrial under Blacktown Local Environmental Plan (LEP) 2015. The local area is characterised by industrial and commercial development. The Proposal does not require the construction of additional infrastructure and would not change the current land use of the Proposal Site. Therefore, the Proposal would remain consistent with the objectives of the IN1 zone, is considered to be consistent with surrounding land uses and is permissible with development consent. A detailed impact assessment, including consideration of impacts to surrounding businesses and resident has been prepared for the Proposal in accordance with the SEARs (SSD-10396) and is summarised in Sections 7 to 9 of the EIS. The assessment found that with the implementation of existing mitigation measures as identified in the Original Approval (SSD-5041) the Proposal would not have any significant impacts to the surrounding environment.	Section 5.3, 7, 8, and 9 of the EIS

5.2 Organisations

Four submissions were received from organisations near the Proposal Site, including the following:

- Steve's Auto Group / Steve's Automotives
- Independent Mowers and Chainsaws
- North Western Surveys
- Pick n Payless (Autorecyclers Pty Ltd).

Response to the issues raised in these submissions are included in Table 5-2 to Table 5-5.

5.2.1 Steve's Auto Group / Steve's Automotives

A submission (objection) was received from Steve's Auto Group / Steve's Automotives. A summary of, and response to this submission is provided in Table 5-2 below.

Table 5-2: Response to Organisations – Steve's Auto Group / Steve's Automotives

Aspect	Response	Reference
Air Quality		
Dust from the Proposal site is migrating to their site (have cars parked on the street)	An Air Quality Assessment has been prepared in accordance with the SEARs (SSD-10396) and is provided in Appendix G and summarised in Section 8 of the EIS. The Air Quality Assessment modelled potential emissions form the Proposal-related activities, including a dispersion model to predict concentrations of pollutants at nearby receivers. A Supplementary Air Quality Assessment has been prepared as part of this RtS (Appendix D of this RtS) in response to stakeholder comments. The Air Quality Assessment as updated by the Supplementary Air Quality Assessment, identified that operation of the Proposal would result in an incremental dust deposition impact of <0.1 g m^{-2} $month^{-1}$. This is well below the criterion of 2.0 g m^{-2} $month^{-1}$ as established by the '*Approved Methods for the Modelling and Assessment of Air Pollutants in NSW*'. During operation of the Proposal, dust generation would be managed through existing mitigation measures, identified for the original approval (SSD-5041) including the current Operational Environmental Management Plan (OEMP), use of water sprays and misting systems, the hammer mill emissions control system, regular use of street sweepers and the use of enclosed conveyors. In particular, the air quality management strategies in the current OEMP will be implemented to reduce air quality impacts as shown in the updated Air Quality Assessment and Section 8 of the EIS.	Section 8 and Appendix G of the EIS Appendix D of this RtS

Aspect	Response	Reference
Traffic and Transport		
Heavy vehicles using Tattersall Road (safety and congestion)	A detailed Traffic and Transport Impact Assessment (TTIA) including an assessment of road safety has been prepared for the Proposal in accordance with the SEAR's (SSD-10396) and is summarised in Section 7 and included as Appendix E of the EIS. The TTIA identified that operation of the Proposal generates approximately 513 vehicles per day. An increase of around 15 hourly vehicles and 215 vehicles per day compared to the currently approved operations. The assessment determined that there would be no significant impact to the safety and function of the road network as a result of the Proposal. In addition, there would be no significant change to the existing level of service at key intersections surrounding the Proposal Site. To minimise the potential for traffic impacts on Tattersall Road, up to 35 stacking spaces (areas where vehicles can wait to access an operational area of the Proposal Site) would be provided within the Proposal Site. As identified within Section 7 of the EIS, available on-site stacking spaces can accommodate the traffic generation associated with the Proposal. The ability for all vehicles to stack within the Proposal Site would optimise daily operations and prevent queuing on the local road network. The existing OEMP will be updated to reflect the operational changes associated with the Proposal. Mitigation measures previously identified for the Original Approval (SSD-5041) would continue to be implemented for the Proposal as described in the TTIA and Section 7 of the EIS.	Section 7 and Appendix E of the EIS
Operational noise concerns from heavy vehicles and site operations	A Noise and Vibration Assessment (NVA) has been prepared for the Proposal in accordance with the SEAR's (SSD-10396). An assessment of noise and vibration is provided in Section 9 and Appendix H of the EIS. Potential noise emissions from the operation of the Proposal relate to processing plant and equipment, and vehicle movements as described in the EIS. Noise monitoring was undertaken at nearby residential and industrial receivers to determine the background noise levels surrounding the Proposal Site. Results of the modelling indicate that operational activities for the Proposal will comply with the noise and vibration criteria as established under the *NSW Policy for Industry* (NPfI) without any additional noise mitigation measures. Notwithstanding these, Sell & Parker have implemented a number of measures to further reduce noise emissions from the Proposal Site such as beeper-less signals and improved fencing. Additionally, as part of this Proposal, Sell & Parker would raise a 70 metre length of the south eastern noise wall by around 2.2 metres. The noise management strategies in the current OEMP will continue to be implemented to manage ongoing compliance as outlined in the NVA and Section 9 of the EIS.	Section 9 and Appendix H of the EIS
Fires in the Tattersall Road area at night-time	While fire risk is inherent to the metal recycling industry, Sell & Parker do not actively create fires during the day or night time period. Existing fire infrastructure that would be utilised for the Proposal has been designed to align with the objectives of 'Fire safety in Waste Facilities' (FRNSW, 2020). Should a fire occur it would be managed in accordance with the Proposal Sites Emergency Response Plan which includes a fire response procedure.	-

5.2.2 Independent Mowers and Chainsaws

A submission (objection) was received from Independent Mowers and Chainsaws. A summary of, and response to this submission is provided in Table 5-3 below.

Table 5-3: Response to Organisations - Independent Mowers and Chainsaws

Aspect	Response	Reference
Air Quality		
Metal dust and debris impacting on cars and their showroom.	An Air Quality Assessment has been prepared in accordance with the SEARs (SSD-10396) and is provided in Appendix G and summarised in Section 8 of the EIS. The Air Quality Assessment modelled potential emissions form the Proposal-related activities, including a dispersion model to predict concentrations of pollutants at nearby receivers. A Supplementary Air Quality Assessment has been prepared as part of this RtS (Appendix D of this RtS) in response to stakeholder comments. The Air Quality Assessment as updated by the Supplementary Air Quality Assessment, identified that operation of the Proposal would result in an incremental dust deposition impact of <0.1 g m^{-2} $month^{-1}$. This is well below the criterion of 2.0 g m^{-2} $month^{-1}$ as established by the 'Approved Methods for the Modelling and Assessment of Air Pollutants in NSW'. The results in the assessment do not predict any exceedances of the annual average dust deposition rate. During operation of the Proposal, dust generation would be managed through existing mitigation measures, identified for the Original Approval (SSD-5041) including the current Operational Environmental Management Plan (OEMP), use of water sprays and misting systems, the hammer mill emissions control system, regular use of street sweepers and the use of enclosed conveyors. In particular, the air quality management strategies in the current Operational Environmental Management Plan (OEMP) will be implemented to reduce air quality impacts as shown in the updated Air Quality Assessment and Section 8 of the EIS.	Section 8 and Appendix G of the EIS Appendix D of this RtS
Noise		
Operational noise concerns	A Noise and Vibration Assessment (NVA) has been prepared for the Proposal in accordance with the SEAR's (SSD-10396). An assessment of noise and vibration is provided in Section 9 and Appendix H of the EIS. Potential noise emissions from the operation of the Proposal relate to processing plant and equipment, and vehicle movements as described in the EIS. Noise monitoring was undertaken at nearby residential and industrial receivers to determine the background noise levels surrounding the Proposal Site. Results of the modelling indicate that operational activities for the Proposal will comply with the noise and vibration criteria as established under the *NSW Policy for Industry* (NPfI) without any additional noise mitigation measures. Nonetheless, as part of the commitment to continuous improvement and to reflect comments provided within community submissions, Sell & Parker propose to incorporate additional mitigation for noise generated at the Proposal Site. Sell & Parker will raise around 70 linear meters of the existing south eastern noise wall (located on the south eastern boundary of the Proposal Site) by	Section 9 and Appendix H of the EIS

Aspect	Response	Reference
	approximately 2.2 metres to provide additional screening to sensitive receivers in the priority area to the east of the Proposal Site. This has been committed to as a mitigation measure as described in Section 6 of this RtS. The noise management strategies in the current OEMP will continue to be implemented to manage ongoing compliance as outlined in the NVA and Section 9 of the EIS.	
Traffic		
The Proposal would increase the number of large vehicles on Sunnyholt Road	A detailed Traffic and Transport Impact Assessment (TTIA) has been prepared for the Proposal in accordance with the SEAR's (SSD-10396) and is summarised in Section 7 and included as Appendix E of the EIS. The TTIA identified that operation of the Proposal generates approximately 513 vehicles per day. An increase of around 15 hourly vehicles and 215 vehicles per day compared to the currently approved operations, which would not result in significant impacts to the existing road network. The TTIA concluded that here would be no significant change to the existing level of service at key intersections surrounding the Proposal Site, including Sunnyholt Road - Tattersall Road and Sunnyholt Road – Vardys Road intersections. As identified in Section 7 of the EIS, available on-site stacking spaces can accommodate the traffic generation associated with the Proposal. The ability for all vehicles to stack within the Proposal Site would optimise daily operations and prevent queuing on the local road network. The existing OEMP will be updated to reflect the operational changes associated with the Proposal. Mitigation measures previously identified for the Original Approval (SSD-5041) would continue to be implemented for the Proposal as described in the TTIA and Section 7 of the EIS.	Section 7 and Appendix E of the EIS
Site Location		
The Proposal should be located within a different site	A number of alternative scenarios were considered in Section 3.5 of the EIS, including the potential to locate the Proposal at an alternative site. However, the preferred alternative would be to increase operations at the Proposal Site as this option would best address the Proposal objectives whilst minimising potential impacts associated with the Proposal. In addition, the Proposal Site is zoned IN1 General Industrial under Blacktown Local Environmental Plan (LEP) 2015. The local area is characterised by industrial and commercial development. The Proposal does not require the construction of additional infrastructure and would not change the current land use of the Proposal Site. Therefore, the Proposal would remain consistent with the objectives of the IN1 zone and is considered permissible with development consent.	Sections 2.2, 3.5 and 5.4 of the EIS

5.2.3 North Western Surveys

A submission (objection) was received from North Western Surveys. A summary of, and response to this submission is provided in Table 5-4 below.

Table 5-4: Response to Organisations – North Western Surveys

Aspect	Response	Reference
Traffic and Transport		
Congestion from heavy vehicles using Tattersall Road and queuing at the site entrance	A detailed Traffic and Transport Impact Assessment (TTIA) has been prepared for the Proposal in accordance with the SEAR's (SSD-10396) and is summarised in Section 7 and included as Appendix E of the EIS. The TTIA identified that operation of the Proposal generates approximately 513 vehicles per day. An increase of around 15 hourly vehicles and 215 vehicles per day compared to the currently approved operations. The assessment determined that there would be no significant impact to the safety and function of the road network as a result of the Proposal. In addition, there would be no significant change to the existing level of service at key intersections surrounding the Proposal Site. To minimise the potential for traffic impacts on Tattersall Road, up to 35 stacking spaces (areas where vehicles can wait to access an operational area of the Proposal Site) would be provided within the Proposal Site. As identified within Section 7 of the EIS, available on-site stacking spaces can accommodate the traffic generation associated with the Proposal. The ability for all vehicles to stack within the Proposal Site would optimise daily operations and prevent queuing on the local road network. In terms of parking, there would be no changes to workforce and visitation at the Proposal Site or parking requirements. The existing OEMP will be updated to reflect the operational changes associated with the Proposal. Mitigation measures previously identified for the Original Approval (SSD-5041) would continue to be implemented for the Proposal as described in the TTIA and Section 7 of the EIS.	Section 7 and Appendix E of the EIS

5.2.4 Pick n Payless

A formal submission was received from Pick n Payless (Autorecyclers Pty Ltd). A summary of, and response to this submission is provided in Table 5-5 below.

Table 5-5: Response to Organisations – Pick n Payless

Aspect	Response	Reference
Strategic Need		
Consistency and relevance of the Proposal with the China Sword Policy	As noted in Section 3.3 of the EIS, the Proposal represents an opportunity to maximise the capability of an existing RRF as well as further reducing the volume of scrap metal going to landfill. As outlined in sections below, the Proposal aims to optimise the efficiency of the processes at the Proposal Site while increasing the throughput limit of processed material on site. This would facilitate a higher volume of scrap metal being processed that achieves the recycling contamination standards prescribed by China's National Sword Policy.	Section 3.3 of the EIS
Cumulative Impacts		
Cumulative impacts related to noise and vibration, air quality and odour, and traffic and transport	Potential cumulative impacts associated with the Proposal have been addressed in Section 19 of the EIS and the relevant sections in this table. These include: • Traffic surveys undertaken under COVID conditions • Cumulative impacts with respect to noise and air quality.	Section 19 of the EIS and sections below
Fire Safety		
Relocation of machinery (pre-shredder) for fire safety and consistency with MOD 3	The pre-shredder has recently been relocated as approved in SSD 5041 Mod 3.	Section 4.1 of this RtS
Non-compliances with Fire Report	Sell & Parker are undertaking an upgrades program to address non-compliances related to fire infrastructure as identified within the Fire Hydrant Assessment Report (Appendix K of the EIS). This would be complete prior to operation of the Proposal and would be documented in a Fire Hydrant Close Out Report.	Appendix K of the EIS
Requirements for stockpile separation in accordance with the Fire Safety	The Proposal would involve minor changes to working stockpile locations to allow efficient vehicle movements throughout the Proposal Site. A revised fire management stockpile plan showing the location and sizes of stockpiles in accordance with the *Fire Safety in Waste Facility 2020* guidelines is provided as Appendix G of the RtS.	Section 12 of this EIS and Section 4.5 of this RtS

Aspect	Response	Reference
Guidelines – *Fire Safety in Waste Facilities 2020*	Subject to determination, the existing Operational Environmental Management Plans for the Proposal Site (including the Emergency Response Plan (ERP)) will be updated to reflect change to on-site operations and stockpiles (if any). Mitigation measures previously identified for the Original Approval (SSD-5041) would continue to be implemented for the Proposal as described and Section 12 of the EIS.	
Updates to Stockpile Management Plan	A revised fire management stockpile plan showing the location and sizes of stockpiles in accordance with the Fire Safety in Waste Facility 2020 guidelines is provided as Appendix G of the RtS.	Appendix G of the RtS
Environmental Performance		
EPL 'non-compliances'	The Proposal would continue to be regulated by the Department of Planning, Industry and Environment (DPIE) (for compliance with planning approvals) and the NSW Environment Protection Authority (EPA) relating to compliance with the Environmental Protection Licence (EPL). The Proposal Site currently operates with EPL No.11555. This EPL is anticipated to be updated to accommodate the Proposal. Environmental performance (for the existing operations and the Proposal) would be managed in collaboration with the EPA as detailed in Section 1.2.4 of the EIS. Sell & Parker are committed to a program of continual environmental improvement for their business and operational sites. This is reflected through their environmental management system and operational management plans which detail the procedures that form the stages of the continuous improvement cycle as shown in Figure 1-2 of the EIS. As part of their commitment to continual environmental improvement Sell & Parker will continue to engage in Independent Environmental Audits on a 3 yearly cycle and promptly implement any further measures as required.	Section 1.2.4 of the EIS
Need for further mitigation measures in the OEMP	As noted in sections above, the existing Operational Environmental Management Plan (OEMP) will be updated to reflect the operational changes associated with the Proposal. Mitigation measures previously identified for the Original Approval (SSD-5041) would continue to be implemented for the Proposal.	Section 6 of this RtS
Air Quality		
No consideration of air emissions from haulage activities (external)	Air emissions from haulage activities have been included in the emissions inventory (volume source emissions) in the Supplementary Air Quality Assessment Information (Appendix D) of this RtS. The modelling results show that the operation of the Proposal would not lead to any additional exceedances on the relevant criteria.	Appendix D of this RtS
Diesel exhaust emissions from vehicles and plant have not been considered	The number of heavy vehicles entering the Proposal Site on a busy day is 28 per hour, with additional 6 light vehicles per hour (representing approximately 1 vehicle every 2 minutes). The diesel generated particulate emissions from vehicles and plant has been adopted in the emissions estimation in the Supplementary Air Quality Assessment Information (Appendix D of this RtS). The assessment does not predict the operation of the Proposal would lead to any additional exceedances of the relevant criteria.	Appendix D of this RtS

Aspect	Response	Reference
No consideration of moisture content or mean wind speed	Emissions for wind erosion sources (i.e. material stockpiles) have been modelled as wind speed varying volume sources using the NPI Wind Erosion equation. In addition, emissions for material handling and transfer points have been estimated with moisture content (assumed 2%) as outlined in the Supplementary Air Quality Assessment Information (Appendix D of this RtS). Therefore, the air modelling undertaken to date has considered and adequately assessed moisture content.	Appendix D of this RtS
Only emissions of odour and NOx have been assumed for Oxy cutting	As noted in Section 8 of the EIS, oxy-cutting operations will not change as part of the Proposal. However, the emissions estimation for the oxy-cutter has been updated as part of the emissions inventory of the Supplementary Air Quality Assessment Information (Appendix D of this RtS). It is noted that the emissions inventory includes particulates and all measured metal types as measured during an emission test during September 2019 (Ref: R007718). Dispersion modelling of these emissions has also been included as part of the Supplementary Air Quality Assessment Information. The assessment does not predict the operation of the Proposal would lead to any additional exceedances of the relevant criteria.	Appendix D of this RtS
It is unclear if a maximum 24-hour average rate has been adequately assessed for 24-hour average impacts (worst-case emission estimates)	The Supplementary Air Quality Assessment Information (Appendix D of this RtS) has re-estimated emissions based upon data derived from Table 2-3 of the EIS, which represents the maximum operational capacity and operating hours of each process component. This is considered a worst-case scenario as it assesses each item of processing equipment operating at 100% capacity. In reality, this equipment would be operating at less than 80% of its maximum processing capacity.	Appendix D of this RtS
The predicted cumulative impacts of the Proposal to air quality does not accurately consider existing or proposed neighbouring operations (Pick n Payless facility)	Air quality impacts related to neighbouring operations at the Pick n Payless facility have been addressed in Section 19.3 and Air Quality Assessment (Appendix G) of the EIS. The assessment concluded that the impacts are not considered significant with regards to the operations of the PnP facility. The aggregated impacts have been re-assessed and presented in the Supplementary Air Quality Assessment Information (Appendix D of this RtS). The assessment found there would be an exceedance of the 24-hour average PM_{10} and $PM_{2.5}$ criteria at R28. However, the background is (in itself) exceeding the air quality criterion. The aggregated assessment has used the maximum incremental impact predicted in the Supplementary Air Quality Assessment with the respective contemporaneous 24-hour background and aggregated this with the maximum 24-hour increment predicted from emissions associated with the proposed Pick N Payless site. It is noted that this is a highly conservative assumption, as the incremental impacts are not necessarily contemporaneous.	Appendix D of this RtS

Aspect	Response	Reference
Noise and Vibration		
Monitoring data is too short term and only obtained from one receiver Monitoring not consistent with PnP results R3 categorisation should be 'suburban' No consideration of noise emissions from haulage activities (external) Noise contours not provided	The Supplementary Noise and Vibration Impact Assessment (refer to Appendix C of this RtS) has included additional long term noise monitoring at four locations between 11 February and 24 February 2021 to determine the overall single L_{A90} Rating Background Levels (RBL) and representative ambient L_{eq} noise levels for each assessment period in accordance with the NSW 'Noise Policy for Industry' (NPfI). The project noise trigger levels and sleep disturbance criteria have been updated based on the more recent monitoring data. Notwithstanding the updated project noise trigger levels and sleep disturbance criteria noise emissions for all receivers comply with relevant project noise trigger levels without any additional noise mitigation measures. As the existing acoustic environment surrounding the subject site varies, noise sensitive receivers have been grouped into Noise Catchment Areas (NCAs) based on areas with similar acoustic environments. Receivers' locations have been selected as being potentially the most noise affected by the Proposal within each identified NCA. Supplementary Noise and Vibration Impact Assessment includes the categorisation of R3 (located at Railway Road, Marayong, approximately 830 metres west of the Proposal Site) as a residential receiver and considered representative of the nearest affected receivers within NCA3. Section 8 of the Supplementary Noise and Vibration Impact Assessment includes a consideration of road traffic noise. The assessment concludes the additional traffic on Sunnyholt Road as a result of the Proposal Site would not contribute to the existing traffic noise levels from Sunnyholt Road to the affected residences and would be significantly less than the allowable 2dB(A) increase to existing traffic noise levels. Operational noise contours have been provided in the Supplementary Noise and Vibration Impact Assessment for worst case wind conditions and has included modelling of surrounding built form.	Appendix C of this RtS
Traffic and Transport		
Traffic surveys undertaken in COVID conditions	Traffic surveys were undertaken in mid-February 2020, while State Government restrictions due to the COVID-19 pandemic came into effect in April 2020. Therefore, traffic conditions on the surrounding road network included in the TTIA in the EIS (and assessed in February 2020) were reflective of typical conditions and are considered adequate. This is supported by Average Annual Daily Traffic (AADT) available online on Transport for NSW's website. AADT data on Sunnyholt Road in the vicinity of the Proposal Site demonstrates that a reduction in traffic flows occurred in April 2020, as shown in Figure 1 of Appendix B of this RtS. The reduction in traffic flows as shown in Figure 1 correlates with the implementation of State Government restrictions in April 2020.	Appendix E (TTIA) of the EIS Appendix B of this RtS
On-road (Tattersall Road) parking is exacerbated from Kings Park trucks	As noted in Section 7 of the EIS and TTIA, to minimise the potential for traffic impacts on Tattersall Road, up to 35 stacking spaces (areas where vehicles can wait to access an operational area of the Proposal Site) would be provided within the Proposal Site. This traffic assessment determined that available on-site stacking spaces can accommodate the	Appendix E (TTIA) of the EIS

Aspect	Response	Reference
	traffic generation associated with the Proposal. This stacking capacity has been incorporated to manage queuing of vehicles on Tattersall Road. It is understood that some vehicles park legally within the unrestricted parking areas along Tattersall Road prior to the commencement of operations for the Proposal Site and surrounding sites. As these vehicles are not Sell & Parker fleet trucks, they are outside of Sell & Parkers control. The existing OEMP will be updated to reflect the operational changes associated with the Proposal. Mitigation measures previously identified for the Original Approval (SSD-5041) would continue to be implemented for the Proposal as described in the TTIA and Section 7 of the EIS.	
Sell and Parker should have consulted with TfNSW	Sell & Parker has had ongoing consultation with TfNSW throughout the process including during the SEARs preparation, EIS preparation (refer to Section 6.1.4 of the EIS) and as part of exhibition (refer to Section 4.4 of this RtS).	Section 4.4 of this RtS
No parking demand survey has been undertaken	As assessed in Section 6.1 of the TTIA submitted with the EIS, the Proposal would not change the number of staff at the Proposal Site. As assessed in the Original Approval, the existing RRF would require 79 staff car parking spaces which is currently accommodated at the Proposal Site. For this reason, the parking demand at the Proposal Site would be satisfied by the existing parking provision.	Appendix E (TTIA) of the EIS
Safety survey not undertaken and separate gates for cyclists not provided	As noted in Section 7.2.7 of the EIS, any cyclist accessing the Proposal Site would do so via the existing light vehicle access driveway. This access arrangement would not change as a result of the Proposal. Therefore, a safety survey is not required for the Proposal.	Section 7.2.7 of the EIS
Outside of peak traffic movements have not been considered	The TTIA (Appendix E of the EIS) considered the peak periods for the road network which is considered the worst case scenario for the Proposal. The additional traffic from the Proposal has been considered in the context of the weekday AM and PM peak periods, in addition to the Saturday midday peak period. This is consistent with Austroads and RMS guidelines for carrying out a traffic impact assessment, and the SEARs issued for the Proposal. The traffic impact assessment provided is therefore considered suitable for the assessment.	Appendix E (TTIA) of the EIS
Greenhouse Gases		
No consideration of vehicle movements	The majority of vehicles delivering materials to and dispatching materials from the Proposal Site are not owned by the Proponent and GHG emissions associated with the use of those vehicles are not the responsibility of the Proponent. These emissions would be categorised as Scope 3. As outlined in Section 4.2 of the GHG report, Scope 3 emissions have not been considered. This is considered appropriate, as the Proponent does not have any control over these emissions.	Section 4.2 of Appendix L of the EIS

6 COMPILATION OF MITIGATION MEASURES

A compilation of mitigation measures from previous approvals that have been implemented has been provided in this section to satisfy Schedule 2, Part 3 Clause 7 (1)(e) of the EP&A Regulation. The EIS for the Proposal has identified a range of environmental impacts from the Proposal. The EIS has identified that the existing controls at the Proposal Site as identified through previous assessments are suitable to mitigate potential impacts associated with an increase in throughput.

Noise

The EIS has identified that the existing controls at the Proposal Site as identified through previous assessments are suitable to mitigate potential impacts associated with an increase in throughput. Nonetheless, as part of the commitment to continuous improvement and to reflect comments provided within community submissions, Sell & Parker propose to incorporate additional mitigation for noise generated at the Proposal Site. Sell & Parker will raise around 70 linear meters of the existing eastern noise wall (located on the south eastern boundary of the Proposal Site) by approximately 2.2 metres to provide additional screening to sensitive receivers in the priority area to the east of the Proposal Site. This has been committed to as a mitigation measure as described in Section 6 of this RtS.

Hazards and Risk

In response to comments provided on the EIS, Arriscar were engaged to undertake a preliminary risk screening (as described in DPIE's Applying SEPP 33 guidelines) and a Preliminary Hazard Analysis (PHA). These have been included as Appendix J of the RtS. The assessment found that the Proposal complies with DPIE's quantitative and qualitative risk criteria for land use safety planning and included several recommendations based on the findings of the risk assessment. These recommendations have been incorporated as mitigation measures for the Proposal.

Fire

Sell & Parker are undertaking an upgrades program to address non-compliances related to fire infrastructure as identified within the Fire Hydrant Assessment Report (Appendix K of the EIS). These upgrades will be completed prior to operation of the Proposal and the details will be documented in a Fire Hydrant Close Out Report.

Consolidated list of mitigation measures

The mitigation measures listed below (with the exception of the aforementioned increase to noise wall height, recommendations from the PHA and fire upgrades) have been extracted from previous impact assessments, conditions of consent for existing approvals and the existing operational environmental management plans. These mitigation measures will be implemented to minimise the impact of the Proposal on the surrounding environment.

The compilation of mitigation measures provided in Table 6-1 represents the final mitigation measures for the Proposal to be incorporated into the conditions of consent for the approval of the Proposal. Given that the Proposal does not involve any construction works, all mitigation measures are to be implemented prior to or during operations under an increased throughput limit.

Changes to mitigation measures from those presented in Table 21-1 of the EIS have been marked in orange.

Table 6-1: Compilation of mitigation measures

Environmental Aspect	Ref	Mitigation Measures	Implementation Stage
0. General	0A	• The following OEMP documentation would be updated to ensure consistency with the Proposal activities and the mitigation measures identified within this EIS: – Operational Environmental management Plan – Air Quality Management Plan – Emergency Response Plan – Landscape Management Plan – Noise Management Plan – Waste Monitoring Management Plan – Water Management Plan.	Operation
	~~0B~~	~~• The pre-shredder will be relocated to the location shown within Appendix C prior to operation of the Proposal being undertaken.~~	~~Operation~~
	0B	• The Proposal Site and operations will be subject to an independent environmental audit every 3 years, unless the Secretary directs otherwise.	Operation
1. Traffic and Transport	1A	• Proposal Site access, driveways and parking will be maintained in accordance with the latest versions of Australian Standard AS 2890.1 and AS 2890.2	Operation
	1B	• The Proposal Site will be maintained to ensure the swept path of the longest vehicle accessing the subject site, as well as manoeuvrability through the site, is in accordance with AUSTROADS Guide to Road Design	Operation
	1C	• On-site stacking would be managed to ensure operation of the Site does not result in any vehicles parking or queuing on the public road network	Operation
	1D	• All vehicles will be wholly contained on site before being required to stop	Operation
	1E	• All loading and unloading of heavy vehicles will be carried out on-site	Operation
	1F	• Proposed turning areas in the car park will be kept clear of any obstacles, including parked cars, at all times	Operation
	1G	• All vehicles will enter and leave the site in a forward direction.	Operation

Environmental Aspect	Ref	Mitigation Measures	Implementation Stage
	1H	• Prior to commencement of operations Sell & Parker will prepare an Employee Transport in consultation with Transport for NSW.	Prior to operation
2. Air Quality and Odour	2A	• All activities on site would be undertaken in accordance with the Site Air Quality Management Plan. The Air Quality Management Plan (AQMP) will include the following: – A description of the measures to be employed to minimise air emissions – A description of contingency measures to deployed to minimise impacts should adverse air emissions occur or appear likely to occur – Identification of triggers for the deployment of operational air quality measures – Identification of triggers for ceasing or partially ceasing operations on-site during adverse air quality conditions – A description of the system used to evaluate the performance of the Proposal Site – Details of the location, frequency and duration of monitoring activities – A protocol to determine the occurrence of any exceedance of the criteria in the EPL should an exceedance occur – A complaints management procedure including steps to investigate complaints and rectify issues where required.	Operation
	2B	• The air quality emissions control system will be maintained in good working order	Operation
	2C	• A continual weather monitoring station will be maintained on-site	Operation
	2D	• An air quality monitoring system will be maintained on-site to evaluate the performance of the Proposal	Operation
	2E	• All plant is to be inspected daily and ensure it is fit for use	Operation
	2F	• Works that have the potential to generate fugitive dust emissions must be planned to take into account weather conditions	Operation
	2G	• Works areas, and where applicable material stockpiles, will be wetted down as required	Operation
	2H	• Work areas will be maintained to allow street sweeper access	Operation
	2I	• Sealed surfaces on-site will be maintained regularly using street sweepers to prevent dust re-entrainment from vehicle movements and other equipment use	Operation
	2J	• All trucks are to have their loads covered	Operation

Environmental Aspect	Ref	Mitigation Measures	Implementation Stage
	2K	• Ferrous vehicles will exit the Proposal Site via the wheel wash	Operation
	2L	• Dust screens and walls will be inspected monthly with any identified failures, gaps or holes placed onto a maintenance report for rectification. Rectifications will be done using appropriate materials that do not diminish their dust collection qualities	Operation
	2M	• When monitoring indicates that there is a potential for the 4 hour rolling average to breach air quality criteria, corrective actions will be instigated	Operation
	2N	• Only one oxy-acetylene torch will be operating at a time	Operation
	2O	• Cutting of any metal beam that is up to 100 millimetres thick will be undertaken with the shear where feasible.	Operation
3. Noise and Vibration	3A	• Acoustic fences and walls will be inspected monthly with any identified failures, gaps or holes placed onto a maintenance report for rectification. Rectifications shall be done using appropriate materials that do not diminish their acoustic qualities	Operation
	3B	• If there are activities to be undertaken that could potentially cause excessive noise or vibration issues, mitigation measures are to be assessed prior to the activity taking place	Operation
	3C	• All plant and equipment installed and used on-site will be maintained and operated in a proper and efficient condition	Operation
	3D	• If weather conditions are likely to result in an increase of noise transmission, activities will be assessed and where required rescheduled, reduced or stopped. Monitoring shall be done in conjunction with data supplied from the on-site meteorological station	Operation
	3E	• An airblast overpressure measuring device will be maintained on the Proposal Site boundary	Operation
	3F	• To manage the potential for noise impacts from explosions the following measures would be implemented: – The use of the pre-shredder to process vehicles – Labelling of bins that we do not accept gas bottles – Signed agreement of the material acceptance form outlining items we don't accept – Inspection of loads – Immediate return of unacceptable items to the truck (where possible) – Deduction of tonnage from the load as a disincentive penalty.	Operation

Environmental Aspect	Ref	Mitigation Measures	Implementation Stage
	3G	• Noise and vibration generating activities on-site would be undertaken in accordance with the Proposal Site Noise and Vibration Management Plan. The Noise and Vibration Management Plan will include the following: – Identification of noise and vibration criteria as established within this EIS to which the Proposal Site must comply – A procedure for investigation of noise complaints including a methodology for rectifying issues as required – A methodology for minimising noise impacts during adverse weather conditions – A procedure for regular assessment of noise monitoring data including measures to relocate, modify and/or stop operations as required to ensure compliance with the noise criteria. – A procedure for recording and checking data collected by the airblast overpressure monitor.	Operation
	3H	• Prior to operating at an increase throughput, the acoustic/sound barrier on the eastern boundary of the Proposal Site will be increased in height by 2.2 metres. Details of this barrier will be updated in the OEMP.	Operation
4. Soil, Water and Contamination	4A	• All activities on the Proposal Site would be undertaken in accordance with the Proposal Site Water Management Plan. The Water Management Plan will include the following: – A description of the operation and maintenance of the existing water management system – A procedure for testing the performance of all components of the Water Management System, including the primary, secondary, and tertiary treatment systems – A description of the system used to manage water quality including sampling and comparison against the baseline data. – Procedures for site inspection and proactive management of potential issues – A procedure of sampling of the sediment basin and identification of corrective actions (where applicable).	Operation
	4B	• Regular cleaning of the oil/water separators will be carried out to maintain performance	Operation
	4C	• The existing network of underground stormwater pipes, inlets and oil/water separators will be cleaned and repaired / replaced as required	Operation
	4D	• Chemicals will be stored within impervious bund of more than 110% of the largest container within the bund	Operation
	4E	• ~~Material~~ Safety Data Sheet (~~M~~SDS) will be maintained for all chemicals stored on-site and made available to Proposal Site personnel	Operation
	4F	• Refuelling will occur away from drainage points, with drip trays used and spill kits available	Operation

Environmental Aspect	Ref	Mitigation Measures	Implementation Stage
	4G	• Waste receptacles will be provided for the storage and disposal of all wastes generated on-site	Operation
	4H	• Collected runoff in the stormwater retention basin will continue to be used for operation as long as the water is of a quality such that impacts to Proposal Site infrastructure, the surrounding environment and the health and safety of employees is avoided	Operation
	4I	• All pollution incidents that threaten or harm the environment shall be reported immediately to relevant authorities in accordance with the *Protection of the Environment Operations Act 1997* (POEO Act)	Operation
	4J	• A Hazardous Materials Register and respective Safety Data Sheets (SDSs) shall be kept on-site at all times and be regularly maintained.	Operation
5. Flooding	5A	• Flood response on the Proposal Site will be undertaken in accordance with the Early Warning Flood Readiness Plan (as part of the Emergency Response Plan).	Operation
6. Hazards and Risk	6A	• All chemicals, fuels and oils used on-site will be stored in appropriately bunded areas in accordance with the requirements of all relevant Australian Standards, and/or EPA's *Storing and Handling Liquids: Environmental Protection – Participant's Manual 2007*	Operation
	6B	• All incidents and near misses will be documented, recorded and investigated	Operation
	6C	• Results of the Proposal Site inspections will be recorded and kept on file	Operation
	6D	• The floc piles will be maintained to less than 4 m in height	Operation
	6E	• Management of environmental emergencies will be undertaken in accordance with the Pollution Incident Response Management Plan	Operation
	6F	• The Proposal Site will be maintained to ensure run-off on operational areas is captured by the Water Management System	Operation
	6G	• Spill kits will be available on-site and be deployed to manage and contain minor spills	Operation
	6H	• All pollution incidents that threaten or harm the environment will be reported immediately to relevant authorities in accordance with the POEO Act	Operation
	6I	• Fire and incidents on the Proposal Site will be managed in accordance the Emergency Response Plan.	Operation
	6J	• The Operational Environmental Management Plan for the Proposal Site will be updated to include the safety requirements for unloading liquid oxygen to the on-site bulk storage tank.	Prior to operation

Environmental Aspect	Ref	Mitigation Measures	Implementation Stage
	6K	• A review and audit of the bulk liquid oxygen storage tank installation will be undertaken prior to operation to ensure compliance with the requirements of the relevant Australian Standard/s.	Prior to operation
	6L	• The steel enclosure surrounding the liquid storage tank will be assessed by a suitably qualified structural engineer (in consultation with Coregas) to ensure it is structurally secure in the event that there is a release of low temperature liquid oxygen.	Prior to operation
	6M	• The Emergency Response Plan will be updated to include a specific emergency response procedure to cover a release of liquid oxygen at the Proposal Site	Prior to operation
	6N	• Fire infrastructure non-compliances, as identified in the Fire Hydrant Assessment Report (Sparks and Partners, 2020) will be rectified prior to operation of the Proposal. Details of works to address non-compliances will be included within a Fire Hydrant Close Our Report.	Prior to operation
7. Waste Management	7A	• All waste materials which meet the specification to be reused/recycled will be processed on-site or be taken to an approved facility, capable of accepting those materials. All other waste is to be disposed of in accordance with the classification of the waste at an approved licensed facility	Operation
	7B	• During operations waste will be managed in accordance with the Waste Management Plan	Operation
	7C	• The designated site manager or appointed responsible delegate should prepare monthly reports clearly documenting the waste that has been received and generated. These should be prepared using waste receipts that have been retained and should include: – Waste classification data to assess compliance with the EPA (2014) Waste Classification Guidelines – A review of licenses held by the facilities where waste has been disposed to access/ensure their ability to accept the waste in accordance with relevant legislation – Include any incident reports relating to waste (i.e. spills) which have occurred over that month. Any corrective actions undertaken should also be included.	Operation
	7D	• Tracking and monitoring of scrap metal processed at the Proposal Site will be undertaken in accordance with the Waste Monitoring Management Plan	Operation
	7E	• The amount of waste received at the Proposal Site will be recorded on a daily basis in accordance with the Waste Monitoring Management Plan – The Proposal Site will not knowingly cause, permit or allow any materials or waste generated outside the Proposal Site to be received at the Proposal Site for storage, treatment, processing, reprocessing, or disposal on the Proposal Site, except as expressly permitted by the EPL.	Operation

Environmental Aspect	Ref	Mitigation Measures	Implementation Stage
9. Greenhouse Gas Emissions	8A	• Where applicable additional equipment purchased will conform to best practice for the management of greenhouse gas	Operation
	8B	• Fuel, water and electricity consumptions shall be monitored, and efficiency improvements regularly investigated and implemented where reasonable and feasible.	Operation
10. Biodiversity	9A	• All vehicles are to keep to the existing and proposed access roads on-site at all times	Operation
	9B	• Maintenance of landscaped areas should be undertaken in a way to prevent the spread of pests and noxious weeds in accordance with the *Biosecurity Act 2015* and the New South Wales Weed Control Handbook - A guide to weed control in non-crop, aquatic and bushland situation (DPI, 2018).	Operation
11. Visual	10A	• Landscaped areas on-site would be monitored and maintained in accordance with the Landscape Management Plan.	Operation
12. Socio-economic	11A	• Where possible, opportunities for offering apprenticeships for new work force and offer additional training for existing workforce would be investigated.	Operation
	11B	• Complaints will be managed in accordance with the Complaints Procedure.	Operation

7 CONCLUSION

Sell & Parker (the Applicant) are seeking approval for the expansion of throughput of an existing RRF located at 23-43 and 45 Tattersall Road, Kings Park. The Proposal would increase the throughput limit of the existing RRF from 350,000 to 600,000 tpa (SSD-10396).

The EIS for the Proposal was publicly exhibited between 1 October 2020 and 29 October 2020. This RtS has been prepared to address comments raised by both government agencies and the community during the public exhibition of the EIS, as well as during further clarifications with agencies. This RtS provides further information and justification for the Proposal in order to respond to, and address, the submissions received.

The EIS and supplementary assessments discussed in this RtS assessed the potential environmental impacts associated with the Proposal and identified that no additional mitigation measures (above those proposed in previous approvals) would be required to manage potential impacts. Nonetheless, as part of the commitment to continuous improvement and to reflect comments provided within community submissions, Sell & Parker propose to incorporate additional mitigation for noise generated at the Proposal Site. Sell & Parker will raise around 70 linear meters of the existing south eastern noise wall (located on the south eastern boundary of the Proposal Site) by approximately 2.2 metres to provide additional screening to sensitive receivers in the priority area to the east of the Proposal Site. This has been committed to as a mitigation measure as described in Section 6 of this RtS.

With the exception of the voluntary increase in noise wall height, the compilation of mitigation measures presented in this RtS (refer to Section 6) has been compiled from previous impact assessments, conditions of consent for existing approvals and the existing operational environmental management plans. The implementation of these mitigation measures further emphasises the activities that would be undertaken to minimise the impact of the Proposal on the surrounding environment.

7.1 Overview of submissions and consultation

During the public exhibition period of the Proposal (1 October 2020 to 29 October 2020), submissions were invited from all stakeholders including members of the community and government stakeholders. A total of 62 public submissions (public and organisation) were received, including 53 objections, 8 comments and one submission in support of the proposal.

This RtS includes consideration of all comments raised by stakeholders and provides additional information, where necessary, to respond to and close out all concerns raised.

7.2 Next steps

DPIE will, on behalf of the NSW Minister for Planning, review and assess the EIS and this RtS. Once DPIE has completed its assessment, a draft assessment report will be prepared for the Secretary of the DPIE, which may include recommended conditions of approval.

Based on the number of objections, it is likely that the SSD Application will trigger IPC determination. If required, the assessment report prepared by DPIE will be provided to the Independent Planning Commission (IPC) for consideration. The IPC would then assess and determine the Proposal, with any additional conditions the IPC considers appropriate.

The IPC's determination, including the final conditions of approval and the Secretary's report, will be published on the DPIE's website immediately after determination (together with a copy of this RtS and all other relevant information).

Sell & Parker is committed to continuing to consult with stakeholders, including the community throughout the planning of the Proposal and future stages of development.

APPENDIX A SUPPLEMENTARY FLOOD ASSESSMENT FIGURES

APPENDIX B SUPPLEMENTARY TRAFFIC ASSESSMENT INFORMATION

APPENDIX C SUPPLEMENTARY NOISE AND VIBRATION IMPACT ASSESSMENT

APPENDIX D SUPPLEMENTARY AIR QUALITY ASSESSMENT INFORMATION

APPENDIX E TAPM VALIDATION

APPENDIX F REVISED KEY ELEMENTS FIGURE

APPENDIX G REVISED STOCKPILE PLAN

APPENDIX H UPDATED WATER MANAGEMENT ASSESSMENT

APPENDIX I PRELIMINARY HAZARDS ANALYSIS