Response to Submissions Proposed Resource Recovery and Recycling Facility

March, 2006

Transpacific Industries Group Ltd

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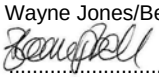
Signed:	
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Contents

Page Number

1. Introduction 1

2. Odour 4

2.1 Issues Raised in Submissions 4
2.2 Response 4

3. Site Suitability 6

3.1 Issues Raised in Submissions 6
3.2 Response 6

4. Risk and Hazard 8

4.1 Issues Raised in Submissions 8
4.2 Response 8

5. Socio-Economic Impacts 10

5.1 Issues Raised in Submissions 10
5.2 Response 10

6. Community Consultation 11

6.1 Issues Raised in Submissions 11
6.2 Response 11

7. Traffic 13

7.1 Issues Raised in Submissions 13
7.2 Response 13

8. Noise 15

8.1 Issues Raised in Submissions 15
8.2 Response 15

9. Strategic Planning 17

9.1 Issues Raised in Submissions 17
9.2 Response 17

10. Others 18

10.1 Issues Raised in Submissions 18
10.2 Response 18
10.2.1 Water Quality 18
10.2.2 Farley Sewage Works 18
10.2.3 Visual Assessment 18
10.2.4 Investigation Limitation 19
10.2.5 Adequacy of the Environmental Assessment 19
10.2.6 Management/Offsets of the Development 19
10.2.7 Waste 19

11. Conclusion 20

1. Introduction

In January 2006, Parsons Brinckerhoff Australia (PB) on behalf of Transpacific Industries Group Ltd (TPI) presented to the Department of Planning a draft Environmental Assessment prepared under Part 3A of the *Environmental Planning and Assessment Act 1979* for the proposed Resource Recovery and Recycling Facility (the Facility) at the Rutherford Industrial Estate. The Environmental Assessment underwent a pre-exhibition review and was deemed suitable for public exhibition. On 27 January 2006, the Environmental Assessment was placed on public exhibition for a total of 30 days to 28 February 2006.

54 submissions from the public exhibition period were received. Most of the submissions related to the following issues:

- odour
- site suitability
- risk and hazard
- socio economic impacts
- community consultation
- traffic
- noise
- strategic planning

The table below highlights the key elements raised in each submission. The following sections provide a response to each of the most common issues raised.

	Submissions of Interest							
Submission No.	**Odour**	**Site Suitability**	**Risks and Hazards**	**Socio-Economic Impacts**	**Community Consultation**	**Traffic**	**Noise**	**Other**
1	X	X						
2	X	X						
3	X	X						X
4	X	X	X	X				X
5	**Withheld**							
6	X			X				X
7		X	X			X		X
8	X	X						X
9					X			X
10		X	X	X				X
11		X						
12			X					XX
13	X	X		X				

	Submissions of Interest							
Submission No.	**Odour**	**Site Suitability**	**Risks and Hazards**	**Socio-Economic Impacts**	**Community Consultation**	**Traffic**	**Noise**	**Other**
14	X	X						
15	X	X						
16	X							X
17	X	X						
18	X							X
19	X		X	X				X
20	X	X	X					
21	X	X						
22	X	X						
23	X			X				
24	X	X	X					
25	X	X				X		
26								X
27		X			X	X		
28	X	X	X	X	X			X
29	X	X			X	X		X
30	X	X						
31	X			X				X
32	X							X
33	X							
34	X	X						
35	X							
36		X			X			X
37	X	X	X	X				X
38		X				X	X	X
39	X	X						
40	X			X	X			
41	X	X		X				
42	X	X						
43	X							X
44	X	X						
45	X	X						
46	X	X	X	X				X
47	X				X			X
48								X
49	X	X						X

	Submissions of Interest							
Submission No.	**Odour**	**Site Suitability**	**Risks and Hazards**	**Socio-Economic Impacts**	**Community Consultation**	**Traffic**	**Noise**	**Other**
50		**X**						
51	**X**	**X**						
52	**X**	**X**	**X**	**X**		**X**		**X**
54	**X**	**X**	**X**	**X**		**X**		**X**

Note there was no submission numbered 53

2. Odour

2.1 Issues Raised in Submissions

The key issues in relation to odour were:

- health and safety impacts with respect to odour
- odour from existing developments, cumulative odour impacts and lack of cumulative assessment
- potential odour emissions conflict with surrounding industrial/commercial uses
- separation distance of 1000m, businesses and other proposed residential dwellings not considered
- impacts beyond site boundaries

2.2 Response

A draft Environmental Assessment (EA) for the Proposed Facility was submitted to the Department of Planning for review in September and November of 2005. These submissions included compost and soil conditioner manufacturing operations. Odour modelling was undertaken for the proposed Facility and the conservative odour modelling demonstrated that the adopted NSW Department of Environment and Conservation Guidelines were generally achieved 99% of the time at the nearest residential receptors.

In November 2005, an information evening was held to obtain community feedback about the project. The overwhelming issue raised on the night was concern over odour generated as a result of the compost and soil conditioner manufacturing operations. Concerns raised by the community about odour originate in part from existing odours generated by neighbouring businesses and operations within the Rutherford Industrial Estate. TPI acknowledges that there are localised odour problems from existing businesses however, odour generated by these businesses is beyond TPI's control and beyond the scope of the Environmental Assessment.

TPI listened to the issues raised at the information evening, and in the interests of the community, elected to withdraw the composting operations, therefore effectively removing the potential odour source from the proposed facility.

Accordingly, in January 2006, a revised Environmental Assessment was presented to the Department of Planning removing the previously proposed compost and soil conditioner manufacturing operations.

The compost and soil conditioner manufacturing operations were the key source of potential odour generation from the proposed Facility. As the remaining processes are not considered to be odour generating activities, detailed odour modelling has not been undertaken on those processes. Contributions from the remaining process streams are expected to be negligible and would not add to either local or regional ambient odour levels.

Following discussions with the Department of Environment and Conservation Air Assessment Unit, it was agreed that a cumulative odour assessment was no longer required.

TPI, within their statement of commitments, will implement management practices to ensure that odour is not an issue beyond the boundary of the proposed Facility in accordance with the requirements of the *Protection of Environment Operations Act 1997*.

While local residents of Rutherford associate odour with their knowledge and experience of existing facilities, TPI are committed to using state-of-the-art equipment and best management practices to ensure that off-site odour impacts do not occur. To further reassure local residents TPI will install the following control measures

- enclosure processes within existing buildings
- provision for reverse pulse filtration units
- high level alarms for compounds within the CFS process
- vapour recovery system on stock tanks for hydrogenation and waste water processes to manage potential odour at the site
- emergency flare to be used for plant imbalances (will reduce short term odour events during atypical operations)
- preparation (and submission to the regulatory authorities) of a site-specific Air Quality Management Plan

The negligible contribution of proposed processes (excluding compost and soil conditioner manufacturing operations) to odour generation combined with the odour control equipment, mean that staff and customers within the Rutherford Industrial Estate and local residents will not be impacted by odour.

The proposed Facility is located within the Rutherford Industrial Estate which is zoned 4(a) Industrial General under the Maitland Local Environmental Plan 1993 and is therefore consistent with surrounding industrial/commercial uses. There are existing businesses within the industrial estate which are of a similar nature to the proposed Facility such as Australian Waste Oil Recyclers. Therefore the proposed Facility does not conflict with surrounding industrial/commercial uses.

A separation distance of 1,000 m to residential receptors has been adopted at TPI's Narangba (Queensland) operations. This separation distance has provided a suitable buffer to minimise any loss of local air quality and is expected to be sufficient for Rutherford operations. There are no sensitive receptors located within this 1,000 m buffer as defined by Department of Environment and Conservation Guidelines, therefore impacts on surrounding business have not been considered within this buffer area. However, boundary impacts have been used as a surrogate and have shown that there will be no significant air quality impacts to nearby businesses.

The on-site dam currently contains rainwater runoff from the site and is not an odour source. Water will continue to be detained within the dam for safety purposes for use in an emergency event such as a fire or a spill. Once the site is fully operational, the dam will be used for stormwater detention.

3. Site Suitability

3.1 Issues Raised in Submissions

The key issues in relation to site suitability were:

- proposal should be located away from residences and businesses
- site is not suitable for the proposed activities
- inappropriate/conflicting location given proximity to future and existing areas of employment, residential and recreation largely due to potential odour impacts
- proposed Facility is inconsistent with and will adversely impact on development in and around Rutherford
- not a suitable location given existing odour issues within the Rutherford Industrial Estate

3.2 Response

The land on which the proposed development is to be situated is Zoned *4(a) Industrial General Industrial* under the Maitland *Local Environmental Plan (LEP) 1993*. The 4(a) zone caters for a range of general industrial development. The proposed facility is a general industrial development and is therefore permissible and suitable at the site with development consent.

The LEP states that industrial development is allowed only if it does not adversely affect adjacent residential areas. Technical studies and modelling undertaken for the EA clearly demonstrate that the proposed facility will not impact on adjacent residential areas, particularly air quality (odour) and traffic.

There is no existing residential development located within a 1.5 km radius of the site. The Maitland Urban Settlement Strategy 2001 – 2020 proposes that land within a 1.5 km radius be rezoned to accommodate rural residential development which is longer term development. This land has not yet been rezoned and, given the delays of existing rezoning applications in the Hunter Valley Region, it was not appropriate to consider these areas as residential/rural residential. Therefore existing zoning provisions have been applied to the various environmental assessments undertaken.

Maitland City Council was consulted in June 2005 in relation to the EA requirements. Whilst Council raised a number of issues to be addressed in the Environmental Assessment, the requirement to consider the impact of the proposed Facility on possible future residential developments was not raised.

There are currently existing businesses of a similar nature located within the industrial estate such as Australian Waste Oil Recyclers.

The location of the proposed facility was selected based on proximity and links to major transport facilities including freeways and highways (minimising green house gases) central proximity to clients and waste generators, availability of gas, electricity, telecommunications, water, sewer infrastructure and planning scheme compatibility.

Discussions were held with Council and State Government agencies to outline the proposal and determine the suitability of location to gain preliminary support. At the time of these discussions, local and state government indicated support for the proposed Facility.

Rutherford is currently undergoing growth. The Facility is consistent with the growth strategy of the Maitland Local Government Area and the Hunter Valley region. Approval of the Facility will provide suitable waste recycling and recovery facilities to treat wastes associated with such growth and will also provide employment opportunities for the region.

Many of the submissions suggest that the site is not suitable due to the perceived potential for odour generation arising from existing business and operations. As discussed in Section 2, the removal of the compost and soil conditioner manufacturing operations has eliminated a major potential odour source. Therefore concerns relating to site suitability have been significantly reduced.

Existing localised odour problems within the Rutherford Industrial Estate generated by the local businesses are beyond the control of TPI. Withdrawal of composting from the proposal removes the major source of odour. While local residents of Rutherford associate odour with their knowledge and experience of existing factories, the proposed facility will use state of the art equipment and best management procedures to ensure that odour emissions are within DEC guidelines beyond the boundary.

State-of-the-art odour control equipment proposed for the facility includes:

- processes enclosed within existing buildings
- provision for reverse pulse filtration units on silos
- sensors and high level alarms for compounds within the CFS process
- vapour recovery system on stock tanks for hydrogenation and waste water processes to manage potential odour at the site
- preparation (and submission to the regulatory authorities) of a site-specific Air Quality Management Plan

The site has been used for industrial purposes for more than 50 years. The Rutherford Industrial Estate is a well established and well serviced employment area. The site is surrounded on all sides by other industrial activities and is therefore is visually functionally screened from other activities. There are existing buildings on site older than 50 years which are currently in a degraded state and will be refurbished as part of the proposal, therefore improving visual amenity. The site is therefore well suited for this proposal.

4. Risk and Hazard

4.1 Issues Raised in Submissions

The major issues in relation to risk and hazard raised were:

- concern regarding the management of asbestos
- concern regarding the disturbance and disposal of hazardous materials during construction
- the density of 5 persons per hectare does not reflect the capacity for future commercial/residential/industrial expansion in the area and will limit future growth of the area
- will pose an unacceptable safety and hazard risk to the surrounding community
- the storage of hazardous materials will impact on property values and lifestyle of residents

4.2 Response

A Hazardous Materials Assessment (HMA) for the site was undertaken by TPI identifying potentially hazardous materials from previous land uses such as asbestos, PCBs, hazardous chemicals and chemical wastes, buried ordnance and drums.

PCB's, hazardous chemical and chemical wastes have been removed from the site prior to TPI purchasing the site.

The site has been decontaminated of friable asbestos, broken asbestos sheeting, and lagging, the asbestos roofing has also been sealed to remove immediate health risks. Where construction demolition works are to be undertaken that will disturb hazardous materials these will be undertaken by qualified contractors in accordance with national and state occupation health and safety requirements.

Development of the site and construction of the proposed Facility may result in the disturbance of these hazardous materials. Mitigation measures for the management of the hazardous materials will be implemented at the site by qualified contractors. Hazardous materials will be either removed or managed onsite in accordance with NSW OH&S legislative requirements. Induction for the site works will include asbestos management.

A Preliminary Risk Assessment for the proposed Facility was undertaken to assess the risks posed to the human, social and biophysical environment by all activities associated with the proposed facility. The Preliminary Risk Assessment focused on assessing potential risks associated with the construction and operation of the proposed Facility, in particular the proposed hydrogenation plant and the dangerous goods store.

A population density of 5 persons per hectare has been selected for the risk assessment using the method recommended by the NSW Department of Planning. This is based on the large lots surrounding the Rutherford site, the amount of vacant or agricultural land, and the low intensity of the majority of activities adjoining the site. The higher densities that would be associated with more intensive land uses such as detached dwellings were not used because such land uses do not occur (and are not expected to occur in future) within the

effect areas estimated for the scenarios considered using the recommended assessment method. Effect areas calculated in the Preliminary Risk Assessment range from 25m to 200m. For example, the area to the west of the process area is used for truck parking, with land further west zoned as rural and effectively unpopulated. The area to the south is occupied by other waste processing operations, manufacturing, warehousing and similar industrial or commercial operations, generally located on large lots with significant open space between each building.

The risk assessment based on maximum capacity values showed that the most significant estimated societal risk items are all of relatively low consequence although in some cases they may be relatively frequent. They generally fall outside the societal risk guidelines, being either in the negligible risk area or having consequences not likely to cause a fatality during any one event. The risk of toxic combustion products from Class 6.1 toxic materials in the event of a fire is the most significant. The societal and individual risks from toxic combustion products from Class 6.1 material are likely to be higher than planning guidelines. Further risk assessment has confirmed that the combustion products from a fire could extend beyond the boundary of the site with significant risk of serious injury. The location of the proposed Facility within the Rutherford Industrial Estate minimises the societal and individual risk because the occupancy is relatively low, there are no nearby locations where large numbers of people are likely to congregate, and all potentially exposed people in the area are likely to be mobile and able to avoid toxic exposure.

Risk management systems including relevant Australian Standards, design codes and company procedures are available and will be implemented as part of the design and operation of the Facility to ensure that its operations will not expose persons living or working in the area to unacceptable levels of risk.

5. Socio-Economic Impacts

5.1 Issues Raised in Submissions

The major issues raised with respect to socio-economic impacts were:

- the proposed Facility will have an impact on the value of surrounding properties
- the proposed Facility will detract from customers using the Rutherford Industrial Estate due to odour impacts
- the Proposed Facility has the potential to generate financial losses and impact on productivity at existing businesses
- odour emissions will have an adverse impact on existing businesses being able to retain specialist staff due to poor amenity at the premises leading to long term detrimental impacts on businesses and future growth
- will discourage further investment/development in the area, and will impact on future residential development/property values

5.2 Response

The proposal would require a capital investment of up to $18.65 million. The proposal is expected to employ up to 75 people, is expected to create an additional 97 flow on jobs within the region and $9 million of regional income per annum.

The proposed Facility will be located within an existing industrial estate surrounded by industrial businesses. Refurbishment and development of the site will ensure no adverse visual impact is expected. Surrounding property prices continue to reflect proximity to a long established industrial precinct. The proposed Facility is consistent with existing industrial development and is therefore unlikely to adversely impact on surrounding property values.

The primary socio-economic concerns relate to odour, as discussed in Section 2. However the major source of odour, namely compost and soil conditioner manufacturing operations, have been removed from the proposal. The remaining site processes are not odour generating and therefore socio economic concerns regarding surrounding property values, impacts to customers, retention of specialist staff and declining investment within the area will not be realised.

6. Community Consultation

6.1 Issues Raised in Submissions

The major issues raised with respect to community consultation were:

- inadequate consultation with the community
- lack of proper consultation by the proponent
- unable to access information from website
- several documents in circulation
- proponent failed to consult with locals to ascertain existing air quality impacts in the area

6.2 Response

Key stakeholders, including community, local groups and government agencies were consulted during the preparation of the EA to identify and address issues. The Director-General's requirements for the proposed Facility required consultation with Maitland City Council and other relevant State and Commonwealth government authorities, service providers and community groups.

Extensive consultation with Government agencies, including Maitland City Council was undertaken. There was also widespread consultation with the community.

In October 2005, approximately 450 project newsletters were hand delivered to residential and industrial properties near the proposal. The newsletter provided an overview of the proposal and invited interested individuals to attend a community information evening.

An advertisement informing and inviting the community to attend the information evening was placed in the *Maitland Mercury*.

Letters of invitation were also provided directly to various community groups such as the Maitland Chamber of Commerce and Industry.

The purpose of the information evening, held on Thursday 3rd November 2005, was to provide the community with information on the project, answer questions in relation to the project, obtain community feedback and to identify and address community concerns. Local residents, business owners and councillors attended the evening. The overwhelming issue raised on the night was concern over odour, specifically generated as part of the compost and soil conditioner manufacturing operations.

TPI listened to and considered concerns raised on the night and as a result, in the interests of the community and surrounding businesses, elected to withdraw the compost and soil conditioner manufacturing operations.

On 27 January 2006, the EA was placed on public exhibition for a period of 30 days until 28 February 2006, it was made available for public viewing and was also on the internet utilising the TPI website (a link was provided on the Department of Planning website). The entire EA was divided into small individual downloadable files to allow the public to download and view the document (including dial up computers). During the exhibition period one member of the public contacted TPI indicating difficulties in accessing the document. TPI contacted the

person and assisted them in downloading the document. TPI is unaware of any other problems that the public may have had in accessing the document from the website and took actions immediately to ensure public access to the document was facilitated.

TPI only made one version of the Environmental Assessment available to the public, dated January 2006. Previous versions dated October 2005 and November 2005 were provided to the Department of Planning as working drafts for distribution to relevant reviewing agencies in accordance with Part 3A of the EP&A.

Overall, TPI has undertaken much more community consultation than required by Statutory process. TPI has engaged with the community, has listened and amended the proposal accordingly.

7. Traffic

7.1 Issues Raised in Submissions

The issues raised with respect to traffic were:

- the highway is already under pressure, with the proposed development adding to these problems
- the traffic from the proposed facility will worsen the strain on the highway
- safety impacts on the highway due to heavy vehicles
- intersection traffic controls and road design not considered adequate for heavy vehicles due to high levels of usage on highway
- heavy vehicles using Racecourse Road/highway round about undesirable
- questions how compliance with selected route would be ensured, given not a direct route
- Kyle Street suitable for B-doubles
- upgrading Kyle Street/highway intersection and Kyle Street driveway upgrade to address road safety
- internal circulation
- traffic roundabout on highway
- cost of maintenance

7.2 Response

Northern Transport Planning and Engineering Pty Ltd undertook an assessment of the impact of the traffic generated by the proposed facility.

SIDRA analysis of the intersections of the New England Highway/Kyle Street and Kyle Street/Development access show the existing intersection layouts are capable of accommodating predicted traffic flows past the planning year 2015, including the proposed business park to the north of New England Highway.

A Type ‘A’ Intersection has been constructed at the entrance to the Facility which is suitable for heavy vehicles, including B-doubles.

All heavy vehicles shall enter/leave the site via the Racecourse Road roundabout, with the exception of outgoing vehicles heading west, which turn left onto the New England Highway from Kyle Street. Heavy vehicle movements at the site are generally by vehicles operating from the site, being Transpacific owned and managed. This ownership provides a level of management to ensure that the Racecourse Road Roundabout access is adhered to.

The assessment confirms that the internal road layout will provide sufficient capacity to accommodate B-Double movements to and from all major activity areas.

The 4 way roundabout referred to in the submissions is part of the plan associated with the business park proposed to the north of the New England Highway, not as part of this development.

It should be noted that this traffic assessment still considers traffic generated by composting activities at the site. Composting has since been removed from the proposed development. The removal of the compost related traffic movements decreases the level of traffic generation by approximately 20%.

8. Noise

8.1 Issues Raised in Submissions

The major issues raised with respect to noise were:

- noise assessment omitted proposed and approved development in the Rutherford area
- noise assessment did not assess the impact of increased traffic noise for new areas

8.2 Response

PB undertook an assessment of noise associated with the proposed development. Noise modelling was undertaken in accordance with the reference to the Department of Environment and Conservations Industrial Noise Policy (operational issues), Environmental Noise Control Manual (construction and sleep disturbance) and the Environmental Criteria for Road Traffic Noise (transport) documents.

Baseline ambient noise monitoring was carried out, noise design goals established and noise predictions carried out (for a number of operating scenarios). These works also included an assessment of noise generated by traffic associated with the proposed facility.

Noise design goals were established. It was found that intrusive noise limits (background + 5 dB(A) principle) were more conservative and therefore governed during the day time and evening periods. Amenity noise goals, established with consideration to the existing level of industrial noise, were found to be more conservative and therefore adopted for the night time period. The night time noise goal was applied to the proposed operations for all periods of the day.

Received noise levels were calculated for 16 adjacent existing residential receivers (a total of six noise catchments). Compliance with the conservatively adopted noise design goal of was achieved throughout.

The approach is consistent with current regulatory requirements and will limit the potential for cumulative increases to industrial noise influences to the nearest potentially affected residential receivers.

The assessment of road traffic noise issues included consideration of Roads and Traffic Authority traffic flow data with volumes future projections of traffic flow increases considered.

The assessment found that, due to the magnitude of existing road traffic movements along the New England Highway and the minor contributions the site would have to existing traffic flow numbers, no cumulative increases in existing road traffic noise impacts would occur due to the proposal.

The plant would be expected to reduce total network movements as movements to Branxton, Singleton Newcastle, Sydney and Queensland would not be required as frequently.

It should be noted that this noise assessment still considers traffic generated by composting activities at the site, in addition no front end loaders or windrow turners or associated truck movements will operate on the site with the removal of the composting operations. Composting has since been removed from the proposed development. The removal of these

compost related traffic movements decreases proposed traffic (and therefore associated noise) by approximately 20%.

Of note is the historical growth of the New England Highway. A growth rate of three percent through Rutherford and Maitland would be expected to result in an increase in the range of 1000 to 1500 vehicles per day, of which between 250 – 500 would be expected to be road transport trucks. Compared to the proposed increase of approximately 260 day time movements and 126 night time movements through Rutherford and Maitland related directly to the proposal. It is clear that at final design capacity, the waste resource and recovery facility would not be a significant contributor to existing road traffic movements for the area.

Even though compliance was achieved with all adopted noise goals, a number of noise management practices were recommended within the Environmental Assessment.

9. Strategic Planning

9.1 Issues Raised in Submissions

The major issues raised with respect to strategic planning were:

- conflicts with the direction of the industrial area
- the proposed rezoning of the land north of the New England Highway for industrial land has been supported by Maitland Council, but not endorsed by State Government, therefore amenity of existing rural land uses must be considered
- sterilises land for future residential and commercial development and will inhibit future growth of businesses

9.2 Response

The proposed Facility is located within land zoned 4(a) General Industrial under the Maitland *Local Environmental Plan 1993*. Maitland City Council zoned the Rutherford Industrial Estate as suitable for general industrial development such as the proposed Facility. The proposed Facility is therefore consistent with the direction of the industrial area. Furthermore, Maitland City Council has supported the rezoning of land to the north and east of the proposed site to Category 1 Industrial, further indicating that the proposed Facility is consistent with the future direction of the industrial area.

Whilst the land to the north of the site is likely to be rezoned in the future, technical studies associated with this Environmental Assessment have been conducted on the premise of the existing rural zoning provisions and impacts considered accordingly.

The Maitland Urban Settlement Strategy identifies potential rural residential housing near the existing and proposed industrial estates. Given Council's awareness and experience of existing issues within the Rutherford Industrial Estate, their support and intention to rezone additional land for residential purposes within this area indicates that Council is confident that industrial and residential developments can coexist with appropriate management and is in accordance with Council's development strategy.

10. Others

10.1 Issues Raised in Submissions

The remaining topics raised in the submissions were:

- *water quality* potential for polluted waters to enter residential development areas
- *Farley Sewage Works* has consideration been given to the impact of discharging effluent to Farley Sewage Works and will it result in offensive odours
- *visual assessment* does not provide an adequate level of visual assessment
- *investigation limitations* questions the adequacy of the document given the items listed in the limitations statement
- *adequacy of EA* questions the adequacy of the Environmental Assessment as it does not mention the nearby golf course and impacts the proposal might have on the golf course or proposed redevelopment of the site
- *management/offsets of development* impacts of the Facility should be monitored and reported with offsets to be implemented to maintain an ecological balance and to ensure the long term sustainability of operations
- *waste* seeks clarification of where wastes generated by the CFS would be disposed of as Maitland's Mt Vincent landfill cannot provide a sustainable landfill opportunity.

10.2 Response

10.2.1 Water Quality

Surface water quality impacts will be minimal. During construction of the Facility appropriate erosion and sediment control measures will be implemented. During operation of the Facility, all activities will be undertaken on sealed and imperviously bunded areas to prevent any contact with the external environment. Waste waters will be recovered and treated onsite at the waste water treatment plant prior to disposal.

10.2.2 Farley Sewage Works

The onsite waste water treatment plant will treat industrial waste waters generated from the various waste treatment facilities onsite, stormwater drains, collection pits etc to sewer discharge criteria prior to disposal. Sewer discharge criteria will be specified by Hunter Water. Treated water will be tested prior to discharge. Therefore discharge of treated water to Farley Sewage Works will not result in offensive odours. Effluent will be treated to a standard suitable for reuse in site processes such as wash waters.

10.2.3 Visual Assessment

A visual assessment for the proposed Facility has been undertaken with consideration of building elevations, floor, locality and site plans. The visual assessment has concluded that there would be little change of landscape character as a result of the proposed development.

The buildings will be refurbished and the site landscaped, therefore improving visual amenity.

10.2.4 Investigation Limitation

Technical assessments undertaken for the Environmental Assessment have been prepared based on information provided to PB in accordance with relevant legislative requirements and guidelines. The report has been prepared using contemporary professional standards and relevant legislative standards. The investigations have been prepared in accordance with PB's quality assurance systems.

10.2.5 Adequacy of the Environmental Assessment

Impacts to the nearby golf course have been considered in the various environmental assessments that have been undertaken. Assessment of impacts is based on the current zoning of the land and not the proposed rezoning to resort style housing. The golf course is located approximately 750 m south east of the proposed Facility, therefore given the removal of the compost and soil conditioner manufacturing operations, no significant impacts are expected.

10.2.6 Management/Offsets of the Development

A range of environmental monitoring measures are proposed within the Environmental Assessment pertaining to water, air quality, noise and waste. Impacts from clearing will be offset by planting similar species around the perimeter of the property.

10.2.7 Waste

Industrial waste will be disposed of at an appropriate landfill such as the Sita Environmental Landfill at Kemps Creek.

Solid and inert waste will go to appropriate landfills such as the EnviroGuard Landfill at Erskine Park or appropriate local landfills.

11. Conclusion

The proposed use is complementary to other industrial uses and will not sterilise the opportunity for nearby commercial and industrial activities. The services offered will assist and stimulate other businesses in the area whilst providing sustainable resource recovery and reuse opportunities for industrial waste in addition to employment and regional income benefits. The investigations have been prepared using contemporary professional standards. The impacts on surrounding land uses have been addressed and will be minimal.