PPSSSH-117 - 43 Bay Road, Taren Point

DA22/0632

ASSESSMENT REPORT APPENDICES

Appendix	A	Sutherland Shire Development Control Plan 2015 Compliance Table
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APPENDIX A – Compliance Table – SSDCP2015

<table>
<tr><td colspan="3">Chapter 28 IN1 General Industrial</td></tr>
<tr><td>2. Streetscape and Building Form</td><td></td><td></td></tr>
<tr><td>3. Building Setbacks</td><td>Existing</td><td>No change</td></tr>
<tr><td>4. Daylight Access</td><td>Existing</td><td>No change</td></tr>
<tr><td colspan="3">5. Acoustic Privacy</td></tr>
<tr><td>1. All noise generating equipment must be designed to protect the acoustic amenity of neighbours and surrounding land uses. All noise generating equipment must be acoustically treated and/or screened to meet the project specific noise criteria as determined by the NSW Industrial Noise Policy.</td><td>Council’s EHO has reviewed the application and does not raise objection subject to the adoption of mitigation measures (i.e. closing doors and limit operation of machinery). Increased noise impacts resulting from truck movements (1-2dBA) is considered to be acceptable and will have minimal impacts to sensitive receptors</td><td>Yes subject to conditions and mitigation measures proposed by the applicant</td></tr>
<tr><td>5.3 Assessment Principles Where there is conflict between a noise source (new or existing) and a sensitive receptor (proposed or existing) preference should be given to the attenuation of any noise from the source rather than at the sensitive receptor.</td><td>As above, measures are proposed to minimise impacts to sensitive receptors</td><td>As above</td></tr>
<tr><td>6. Landscaping</td><td>Existing</td><td>No change</td></tr>
<tr><td>7. Access</td><td>Existing</td><td>No change</td></tr>
<tr><td colspan="3">8. Safety and Security</td></tr>
<tr><td>1. Development should be in accordance with CPTED Guidelines.</td><td>Existing</td><td>No change</td></tr>
<tr><td colspan="3">9. Parking Requirements</td></tr>
<tr><td>1. Car parking shall be provided in accordance with the following table:<table><tr><td>Industries including Light Industries</td><td>1 space per 100m², with a minimum of 2 spaces for each industrial unit.</td></tr><tr><td>Warehouse or distributions centres</td><td>1 space per 300 m²</td></tr><tr><td>Office</td><td>Any ancillary office component to an industrial</td></tr></table></td><td>In accordance with the control, 37 spaces are required comprising 30 sps for the warehouse and 7 for the office. The assessment report for DA19/0921 detailed the site has 25 parking spaces and that was sufficient for the existing operations.</td><td>Traffic Section has advised that site has capacity to absorb the extra shift and does not require additional parking. Site has capacity to absorb the additional shift at night without conflict in parking availability. Much the same as the shift change over</td></tr>
</table>

	development shall provide 1 space per 30m² of gross floor area.		during the day. Staggering of shift arrival and departure will ensure minimal conflict.
4. Where a site has more than one street frontage, vehicle access should be from the lowest order road. Vehicle entry points from classified roads are only acceptable where no other access point is possible. Reciprocal rights of carriageway will be required where they can assist in achieving this outcome.		Existing access arrangements will remain in place. Entry from Bay Road and exit onto Alexander Avenue for all trucks	Yes
5. Bicycle parking spaces must be provided at the rate of 1 space per 10 car parking spaces for the first 200 car spaces, then 1 space per 20 parking spaces thereafter. In addition, 1 unisex shower is required per 10 employees.		No bicycle parking is proposed. 3 spaces are required at minimum	Conditions are recommended for a rack to be provided to ensure compliance
6. Bicycle parking facilities are to be installed in accordance with Australian Standard AS2890.3 – Bicycle Parking Facilities (as amended), Austroad's Guide to Traffic Engineering Practice – Part 14 Bicycles and the Austroads Bicycle Parking Facilities: Guidelines for Design and Installation (AP-R527-16).		As above	As above
7. Bicycle parking facilities must address the following design principles: a. Accommodate all usual types of bicycles such that damage to them is minimised during storage and retrieval. b. Not pose a hazard to bicycle users, pedestrians or motorists. c. Be well lit, safe and secure, easy to access and use. d. Cater for the different needs of residents, employees and visitors to the development. e. Be located in convenient and accessible locations within the development that allow for good passive surveillance; such as near		Can be conditioned.	To be conditioned.

key building entrances, the lobby and the lift core. f. When located within a car park, preferably be situated at street level and in a manner that provides the most direct, safe and convenient access while minimising conflict with vehicles and pedestrians. g. Where a bicycle parking and storage facility cannot be located at street level, it must be located no more than one level above or below street level. Access to street level entry and exits must be direct, safe and minimise potential conflicts with vehicles.		
10.Late Night Trading Premises	In relation to Late Night Trading Premises controls, the area zoned IN1 General Industrial is a Low Activity Area. The guidelines for Late Night Premises are in Chapter 37 - Late Night Trading.	Refer to assessment below
11.Waste from Industrial, Commercial and Educational Establishments	Council's Waste Officer has advised they have no objections and no conditions are recommended.	Yes

Chapter 37 Late Night Trading

2. Location of Late Night Trading Activity Areas

The following table sets out the framework for where and at what level of intensity, late night trading may occur. It forms the basis for late night trading hours of operation.

Activity Area	Description	Location
Low	These are areas predominately characterised by low density residential land uses. Premises most suitable in the low activity areas are those that meet local needs.	All areas not included in high and intermediate activity areas

3. Hours of Operation

Neighbourhood shops; Service Stations, Shops and all other unlicensed premises trading after 10pm

Base Hours			Extended Hours		
high	**intermediate**	**low**	**high**	**intermediate**	**low**
6am to 1am	6am to 12pm	6am to 10pm	24hours	24hours	24hours

3. Notwithstanding clause 3.2.1 above, it may be considered reasonable that outdoor areas may operate beyond those hours	While trucks will enter and leave the site, the main noise impacts are undertaken within the	Yes, subject to conditions

identified as 'extended hours,' but only where it can be demonstrated that this will not result in any adverse impacts upon the amenity of surrounding residents and neighbourhoods.	enclosed warehouse area. Through management controls, noise generation during the 3rd shift will have minimal impacts upon nearby sensitive receivers.	
4. Local Amenity		
3. Council may use reviewable conditions where it is uncertain about the impacts of the proposed development on adjoining land uses.	Based on the merits of the application and comments from Council's EHO, a reviewable period is not considered necessary in the circumstances of this application	Not Applicable.
5. Noise Management		
1. The movement of garbage and refuse (including empty bottles and cans) from inside the premises to outside storage bins or areas should not occur: after 10pm; and before 8:00am Monday to Saturday or before 9.00am on Sunday and Public Holidays. Movement of waste (other than cans/bottles or other waste movement with a risk of undue noise) from inside to outside the premises can occur outside these hours provided noise is minimised.	Council's EHO has advised that noise generation and exceedance by 1-2dBA is considered acceptable subject to the adoption of noise mitigation measures and practices. The movement and processing of waste/recyclable products within the warehouse can be undertaken beyond the hours permitted by this control.	Yes, subject to conditions. Refer to Section 10 in this report.
3. No loading/unloading of any goods shall occur after: a. after 7pm; and b. before 8:00am Monday to Saturday or before 9.00am on Sunday and Public Holidays.	a. MRF operations are proposed between 7pm-4am b. weekend and public holiday loading operations are limited between 6am to 4pm.	Refer to Section 10 in this report.
4. The proprietor(s) and/or manager(s) shall take all steps necessary to ensure that no noise nuisance occurs from persons entering or leaving the premises.	Conditions are recommended	Refer to Section 10 in this report.
6. Safety and Security	Existing	No change
7. Management Plans		
1. The following late night trading premises are required to provide a Management Plan:	A PoM is not considered appropriate in the circumstances of this application. Conditions	Refer to Section 10 in this report.

• All premises trading within extended operating hours	are recommended to ensure compliance	
8. Assessment Principles		
1. Hours of operation a. Appropriate hours are dependent on the nature and location of the proposal, the proximity of residential land uses and the potential safety, social or other impacts on the locality. b. Late night premises are encouraged within late night trading precincts; however as a general rule, premises should look to locate where proposed uses are compatible with the surrounding development and amenity impacts will be minimised. c. Premises which operate during the day and not exclusively at night are preferred.	a. the nearest residential receiver is located 167m from the site. Operations onsite will have minimal impacts. Nosie generation from trucks along the road network is considered acceptable. b. the intensification of use of the existing premises is considered acceptable. Relocation is not considered to be an appropriate action as the premises/operation is well established. c. noted	Management and mitigation controls are recommended as identified by the applicant's consulting acoustic engineer. These are supported by Council's EHO
3. Miscellaneous a. In assessing the likely impacts of an application for late night trading premises, concerns raised by objectors are relevant only to the extent that there is a reasonable probability that those impacts will occur as a result of the proposal.	The land use does not trade like a recreation facility, hospitality facility and/or the like. No issues were raised during the notification period	As above
b. For premises that are currently operational, Council must consider the following assessment criteria: i. what are the adverse impacts of the current operation of the premises; ii. what measures are in place to address those impacts; iii. how are those measures documented; iv. have those measure been successful; and v. what additional measures are proposed by the applicant or might otherwise be required.	The 1-2dBA exceedance is not considered to be substantive issue. Council's Health Officer has advised the exceedance will not have an adverse impact upon sensitive receivers. Conditions have been proposed by the applicant's consulting acoustic engineer and are supported by the Health Officer.	To be conditioned.

c. Council must consider the impact of the existing premises on surrounding residential amenity. If this impact is currently unacceptable then the proposed.	As above	As above
d. Extension or intensification should not be granted, unless there are measures proposed to mitigate the existing impact	As above	As above
8.2 Assessment principles for extended hours of operation for unlicensed premises		
1. An approval for extended hours of trading is dependent on context and impact. In cases where impacts on residential properties cannot be effectively managed, late night trading will be limited to base hours only.	The nearest residential receiver is located approx. 167m from the site. in the context of the site's location, buffer distances and management practices, it is considered that a 24 hour operation will have minimal impacts	Yes, subject to conditions
3. Early morning trading (openings prior to 6am) may be acceptable within high activity areas where proponents can verify over time that noise, safety and amenity impacts can be managed to a level to an acceptable community standard.	As above	As above

APPENDIX B – DRAFT CONDITIONS

1. Approved Plans and Documents

The development must be undertaken substantially in accordance with the BASIX certificate, details and specifications set out on the following approved plans:

Plan number	Reference	Prepared by	Date
DA03a	Stockpile Plan (ground floor plan)	Archi Spectrum	25.05.2022

and any details on the application form and on any supporting information received with the application except as amended by the following conditions.

2. Inconsistencies between development consents

In the event of any inconsistencies and to avoid conflict between this and previous development consents, this consent prevails but only as far as:

a) Condition 4 from Development Consent DA#11268 is superseded as 60,000 tonnes of throughput per calendar year is permitted by this consent (Refer to Condition XX in this consent).

b) Condition 5 dot point 1 from Development Consent DA#11268 is amended to read as follows:

"Logging of total volumes of materials processed each day to ensure operations do not exceed an annual limit of 60,000 tonnes;"

c) Condition 25 from Development Consent DA#11268 is superseded by Conditions 13 and 14 in this consent.

All other conditions from Development Consent DA#1/1268 and DA19/0921 remain operable and are not superseded.

3. Maximum permitted throughput per year

This consent only authorises a maximum of 60,000 tonnes of material throughput per calendar year.

4. Maximum permitted material storage

This consent does not authorise the storage of more than 1500 tonnes of material onsite at any one time.

5. Operational Plan of Management

A. The operation of the site must at all times operate in accordance with:

· the Environmental Management and Mitigation Measures table,

· all the recommendations contained in the Environmental Impact Statement prepared by Urban Perspectives dated June 2022,

· the air quality assessment report titled "Visy Resource Management Facility Air Quality Impact Assessment" prepared by Wilkinson Murray (Ref: RWDI#2190011) dated 28 April 2022, and

· the noise impacts assessment report titled "Visy Resource Management Facility Noise Impact Assessment"" prepared by Wilkinson Murray (Ref: RDWI#2190011) dated 28 April 2022 submitted with the application except where modified by conditions in this consent.

B. Prior to the commencement of the operation of extended hours, the plan of management must be amended to incorporate the additional measures and controls. A copy must be provided to council and copies must be kept onsite at all times and available for viewing should the need arise.

C. A sign must be installed on the vehicular entry at Bay Road and at the egress location at Alexander Avenue providing a contact name, mobile phone number and email address of the site manager in the event that someone wants to contact the operator to raise a complaint or the like.

The signs must be 1m x 1m in size and located at the site's entrance on Bay Road and either affixed to the roller door or the external wall of the building immediately adjacent to the egress.

6. Staggering of Staff

To avoid parking and vehicle manoeuvring conflict at the beginning and the end of working shifts, staff must have staggered arrival and departure times. Details must be included in the operational plan of management.

7. Waste Streams only permitted

This consent only authorises the receipt of fully commingled recyclable material, being:

- Paper and cardboard.
- Glass.
- Plastics.
- Metals.

No other waste streams are permitted to be received at any time.

Any putrescible waste disposed of at the site must be isolated and suitably disposed of as soon as practical to prevent odour generation and the like. Details must be included in the Operational Plan of Management.

8. Storage of Hazardous Waste

A. This consent permits the storage of only 4 tonnes of 'hazardous waste' onsite at any one time. In the circumstances of this application, 'hazardous waste' is defined and limited to as follows:

- soft plastics packaging
- electronic equipment
- gas bottles
- fibrous cement

The storage of such waste must be located above the 1% AEP flood level, located on bunded facilities and under the roofed area adjacent to the Shipping Containers.

The persons and/or entity having the benefit of this consent must not allow for hazardous wastes to build up and/or be stored onsite for more than a continual 14 day period.

B. Under no circumstance shall any other type of hazardous waste must be kept onsite. hazardous waste is defined by the protection of environmental operations act 1997 viz:

'hazardous waste' means waste (other than special waste or liquid waste) that includes any of the following-

(a) anything that is classified as-

(i) a substance of Class 1, 2, 5 or 8 within the meaning of the Transport of Dangerous Goods Code, or

(ii) a substance to which Division 4.1, 4.2, 4.3 or 6.1 of the Transport of Dangerous Goods Code applies,

(b) containers, having previously contained-

(i) a substance of Class 1, 3, 4, 5 or 8 within the meaning of the Transport of Dangerous Goods Code, or

(ii) a substance to which Division 6.1 of the Transport of Dangerous Goods Code applies,

from which residues have not been removed by washing or vacuuming,

(c) coal tar or coal tar pitch waste (being the tarry residue from the heating, processing or burning of coal or coke) comprising more than 1% (by weight) of coal tar or coal tar pitch waste,

(d) lead-acid or nickel-cadmium batteries (being waste generated or separately collected by activities carried out for business, commercial or community services purposes),

(e) lead paint waste arising otherwise than from residential premises or educational or child care institutions,

(f) anything that is classified as hazardous waste pursuant to an EPA Gazettal notice,

(g) anything that is classified as hazardous waste pursuant to the Waste Classification Guidelines,

(h) a mixture of anything referred to in paragraphs (a)-(g).

C. This condition does not extend to the storage of the following onsite:

· petrochemicals (unleaded fuel [5L] and diesels fuel [2,200L]),

· oils (410L) ,

· anti-bacterial soaps (5L),

· paint (5L),

· weedkiller (5L) as identified in Section 6.4.1.1 and Table 6.22 from the Environmental Impact Statement that are specifically required to be kept onsite for operational and maintenance aspects of the facility.

9. Vermin and Litter Management

To ensure that the operation of the site has minimal offsite impacts in regard to litter and vermin impacts and as identified in the application, the following must be undertaken:

· all waste materials and recovered product handled and stored within buildings.

· recyclable waste materials received into designated 3 sided receival bays only.

· recovered product stored in designated material storage areas only.

· waste residence time onsite typically less than 24 hours and up to 48 hours.

· routine housekeeping to ensure loose items of any waste are collected and contained.

· daily site inspection checklist including maintaining housekeeping standards. and

· rat and mice bait stations are placed throughout the facility and maintained by a vermin management service provider.

· Litter patrols must be undertaken at the end of each shift to ensure that all external areas of the buildings and immediately around the vehicular exit onto Alexander Avenue are free from scraps of paper, cardboard, glass fragments, food and/or other wind blow materials.

10. Provision of Bicycle parking

Prior to the commencement of extended hours of operation permitted by this consent, a Bicycle Parking Rack must be provided near the southern side of the office building. The rack must have the capacity to accommodate the parking/storage of 3 bicycles.

Bicycle parking facilities are to be installed in accordance with Australian Standard AS2890.3 Bicycle Parking Facilities (as amended), Austroad's Guide to Traffic Engineering Practice - Part 14 Bicycles and the Austroads Bicycle Parking Facilities: Guidelines for Design and Installation (AP-R527-16). The rack must not interfere with access into and out of any building, vehicle manoeuvring, parking and/or the like.

11. Shipping Containers

The shipping containers that are denoted as 'temporary' on the plan titled 'Stockpile Plan' prepared by Archi Spectrum (Drawing Number DA03a), dated 25.05.2022 are permitted to remain onsite and used for as permanent storage facilities.

This consent does not authorise additional shipping containers to be stored onsite without prior approval.

12. Bunding Certification

Prior to the commencement of the extended hours of operation or within 3 months from the date of this consent, whichever comes first, the persons or entity having the benefit of this consent must engage a suitably qualified and practicing surveyor to certify the bunding and crests that have been installed to ensure flood waters do not inundate the buildings have a height of RL2.45AHD.

If bunding and crests are below RL2.45AHD, the persons or entity having the benefit of this consent must undertake the necessary works to ensure compliance with the above.

13. Flood Procedures

In the event of a severe storm and/or flooding, all procedures and recommendations contained in the document titled 'Emergency Procedures - Flood or Severe Storm' prepared by Visy Australia Pty Ltd (Ref: VR Taren Point Emergency Management Plan - Attachment A5 - Issue A) dated 20 March 2021 must be adhered to.

The Plan of Management must be amended to ensure the recommendations and procedures contained in the above document are included.

14. Prevention of Air Pollution

Air Pollutants / contaminants can be hazardous to human health as well as create a nuisance through odours and deposited dusts. Use of trucks and plant equipment to recover recyclables or to temporarily store them for transfer to another premise where they will be recovered can, if not appropriately managed and mitigated,

generate high levels of air pollutants such as fine particulates PM2.5, PM10, deposited dusts and odours.

To manage and mitigate the impact of air pollutants / contaminants generated from activities at the site, an Air Quality Management Plan (AQMP) is required and must be applied at all times - (the AQMP can be integrated in the Operational Management Plan for the facility)

Air Quality Management Plan

A. Before Commencement

(a) An Air Quality Management Plan (AQMP) is required to be prepared by a suitably qualified air quality consultant to ensure that air pollutants / contaminants generated from site are managed appropriately and do not have an adverse impact on the environment, surrounding land uses and human health.

It must include:

a. Air quality standards and goals,

b. Identify potential issues that may affect air quality and include any mitigation actions / measures necessary,

c. Measures and improvements to site practices to reduce air emissions, where possible,

d. Outline the tasks staff are required to do in response to complying with the AQMP

e. Any regular air quality monitoring required, or instances where air quality monitoring will be required, i.e. when new statutory standards come into effect.

B. Ongoing

(a) To ensure contaminants are not released into the atmosphere from the premises, the use of the building and any plant, equipment and fittings installed therein must be operated so as to meet the following requirements:

i) Protection of the Environment Operations Act 1997

ii) Protection of the Environment Operations (Clean Air) Regulation 2010

iii) AS 1668 - Part 2 - 2012

iv) AS 3666.1 - 2011

v) AS 3666.2 - 2011

vi) AS 3666.3 - 2011

vii) Public Health Act - 2010

viii) Public Health Act (Microbial Control) Regulation 2012.

(b) The site Air Quality Management Plan (AQMP) required in (a) above must be complied with at all times.

(c) The AQMP must be reviewed annually to ensure it is still appropriate.

(d) The AQMP must be updated in accordance with any statutory changes, i.e.: applicable relevant NSW and/or National Air Quality Standards as soon as practicable after the new standards come into effect. Where there are statutory changes, an air quality monitoring event shall occur to ensure that emissions are still within standards. If emissions exceed new criteria, changes to site practices must be explored and implemented to reduce emissions below statutory standards.

(e) The AQMP must be updated if and when changes to operating procedures are implemented.

(f) Any reviews and changes to the AQMP must be undertaken by an appropriately qualified air quality consultant.

(g) The AQMP and its associated documentation requirements must be made available to Council officers on request.

15. Noise Control - Design of Plant and Equipment (Continual Operation)

To minimise the impact of noise from the development, all sound producing plant, equipment, machinery, mechanical ventilation systems and / or refrigeration systems:

A. Design

All plant and equipment must be designed and / or located so that the noise emitted does not exceed the Project Specific Noise level when measured at the most affected point on or within any residential property boundary.

The Project Specific Noise level must be the most stringent noise level of the Intrusive and Amenity criteria and be calculated in accordance with the provisions of the NSW Environmental Protection Authority Noise Policy for Industry 2017.

Note: The method of measurement of sound must be carried out in accordance with Australian Standard 1055.1.

B. Ongoing

All plant and equipment must be operated and maintained in accordance with the 'A' above.

16. Compliance with Noise Impact Assessment

To minimise the impact of the development on the surrounding residential and industrial receivers, all noise control measures outlined in Section 6 of the submitted Noise Impact Assessment prepared by RWDI Australia Pty Ltd, report number 2190011 dated 28 April 2022, must be complied with at all times the business is in operation.

These measures are:

· The MRF plant can operate during all periods (day, evening and night).

· The two roller doors located on the south side, close to the eastern wall, are to be shut during night-time (i.e. 10.00pm to 5.00am) operation when access to the eastern door is not required.

· Front end loader should only operate inside the warehouse (not outside the warehouse) during night-time (i.e. 10.00pm- 5.00am).

17. Acoustic Post Validation Report

A. Due to the marginal exceedances of the applicable night noise criteria detailed in *Table 4-9- Operational Noise Predictions (with MRF Operating)- Night (10pm-5am)* of the submitted Noise Impact Assessment prepared by RWDI Australia Pty Ltd, report number 2190011 dated 28 April 2022, certification must be provided to Council by a suitably qualified and practicing acoustic engineer **within 12 weeks** of the

commencement of increased operating hours that the operational noise requirements specified in the Table above are being achieved. The report is to include post validation results.

B. Should any exceedance beyond what has been specified in the aforementioned report, then the persons and/or entity having the benefit of this consent must undertake necessary rectification works **within 28 days** of the issue of the post validation report.

C. After the completion of the necessary rectification works to address the non-permitted noise exceedance(s), a further validation report must be submitted **within 28 days** after the completion of the rectification works to certify that the works have addressed the issue(s).

18. Ongoing Acoustic Compliance

Receipt of noise complaints from the operation of the facility will result in the requirement for further acoustic assessment of the business operations to determine compliance with the NSW Noise Policy for Industry (NPfI). Exceedances of the applicable assessment criteria may result in further acoustic attenuation and operational measures being adopted and enforced.

19. Sydney Water Requirements & Section 73 Compliance Certificate

A. Before commencement of extended hours

Prior to the commencement of extended hours of operation permitted by this consent, the persons(s) or entity having the benefit of this consent must consult with Sydney Water. This consultation allows Sydney Water to determine if sewer, water or stormwater mains or easements will be affected by any part of your development.

Please refer to the web site www.sydneywater.com.au.

Prior to the commencement of the extended hours, the persons having the benefit of this consent must submit a copy of the Compliance Certificate to Council to certify that the consultation has taken place.

Sydney Water may require the construction of works and/or the payment of developer charges. This assessment will determine the availability of water and sewer services, which may require extension, adjustment or connection to the mains.

If Sydney Water require works to be undertaken, the works must be fully completed prior to the commencement of the extended hours of operation.

Sydney Water Advice on Compliance Certificates:

Sydney Water will assess the development and if required will issue a Notice of Requirements letter detailing all requirements that must be met. Applications can be made either directly to Sydney Water or through a Sydney Water accredited Water Servicing Coordinator. Please make early contact with the Coordinator, since building of water / sewer extensions can be time-consuming and may impact on other services as well

as building, driveway or landscaping design.

Go to www.sydneywater.com.au/section73 or call 1300 082 746 to learn more about applying through an authorised WSC or Sydney Water.

20. Industrial Activities Outside the Building

A. Ongoing

To protect the amenity of the surrounding environment there must be no industrial activities, storage or depositing of any goods or maintenance to any machinery conducted external to the building.

21. Loading and Unloading

To preserve the amenity and ensure the safety of the public:

A. Ongoing

All loading and unloading of vehicles carrying materials to be recycled must only be carried out wholly within the building.

22. Hours of Operation

A. Occupation

The business may only operate between the following hours:

i) Monday to Friday: 24 hours

The operation of the site during Monday to Friday inclusive must be undertaken in accordance with the following:

Shift	**MRF Operation Times**	**TRF Operation Times**
Shift 1 4am-12pm	· 4am-5am (cleaning) · 5am-11am (MRF) · 11am-12pm (cleaning and maintenance)	· 4am-12pm (receiving and loading)
Shift 12pm-8pm	· 12pm-1pm (cleaning and maintenance) · · 1pm-8pm (MRF)	· 12pm-8pm (receiving and loading)
Shift 3 9pm-4am	· 9pm-4am (MRF)	· No TRF activities
Office	· No restriction	

ii) Saturday, Sunday and Public Holidays: 6am to 4pm only.

The operation of the site during Saturday, Sunday and/or Public Holidays must be undertaken in accordance with the following:

Shift	**MRF Operation Times**	**TRF Operation Times**
Operation Shift 6am-4pm	· 6am-2pm (MRF) · · 2pm-4pm (cleaning)	· 6am-2pm (loading out material)
Maintenance Shift 6am-4pm	· 6am-4pm (maintenance and loading out material)	· No TRF activities

APPENDIX C – PAD Letter

Slavco Bujaroski - 9710 0167
File Ref: PAD19/0067
12 November 2019

Maincon Holdings Pty Ltd
Suite 3.18, 32 Delhi Road
NORTH RYDE NSW 2 113

Dear Sir/Madam

Pre-Application Discussion No. PAD19/0067
Proposal: Pre-Application Discussion
Property: 43 Bay Road, Taren Point

Council is committed to achieving quality built outcomes for the benefit of residents and the broader community. The Pre-Application (PAD) process is intended to assist in this goal and I appreciate you taking the time to attend.

The PAD held on 22 October 2019 regarding the above development proposal was attended by Carolyn Howell (Team Leader), Slavco Bujaroski (Development Assessment Officer), Leanne Mariani (Environmental Scientist) and Peter Loomes (Building Surveyor) who attended the meeting on behalf of Council. The following attended as the applicant group:

Luke Krstanovski and Jake Luschwite	Visy Recycling
Andrew Wise	Maincon Holdings P/L (Land Owner)
Robert Fewster and Stuart Wilmot	Urban Perspectives (Planner)
Martin Bednarczgk	Archispectrum (Architect)
Daniel Turhanlar	Mobius Fire Safety

The purpose of this letter is to provide a summary of the issues discussed at the meeting and provide information that will assist you complete a development application (DA). Council cannot provide you with certainty on the determination of the proposal until a DA has been lodged and assessed.

Your DA will need to be supported by a Statement of Environmental Effects addressing all relevant Environmental Planning Instruments, and the detailed planning controls contained in Council's Development Control Plan.

<u>The Site and Proposal:</u>
The site is located on the north eastern corner of the intersection of Bay Road and Alexander Avenue in Taren Point. The property is 'L' shaped and has a 63m long frontage to Bay Road, 114m long frontage to

Alexander Avenue and has an area of 10,860m^2. The land is generally flat and there are no significant natural features on the site.

An existing factory building is located around the perimeter of the site starting from Bay Road extending along Alexander Avenue and then across the full length of the northern boundary. Visy Recycling occupies that part of the factory building that extends across the full length of the northern boundary and a length of approximately 53m along Alexander Avenue from the north west corner of the site to the south.

The proposal relates to the existing factory building occupied by Visy Recycling. Specifically, the proposed works relate to the north western part of the building affected by a recent fire. The applicant proposes to re-construct the external walls, replace structural portal frames and replace roof framing and cladding damaged by the fire as well as to upgrade works relating to BCA compliance. The applicant indicated that the proposal may include alterations to the existing roof form.

The property is within Zone IN1 General Industrial under the provisions of Sutherland Shire Local Environmental Plan 2015 (SSLEP 2015). The proposed rebuilding and alterations to the existing industrial building is a permissible form of development within this zone. The main consideration is whether or not the proposal is to be classified as designated development. This is discussed in further detail below.

SSLEP2015 indicates that the site is mapped as being potentially contaminated, flood affected and affected by Class 3 acid sulphate soils. These specific characteristics of the site will need to be taken into consideration when preparing your DA.

Comments on the Proposal:

The following comments are provided in respect to the concept plans presented for consideration at the meeting.

1. Existing consent

The most recent consent for the facility (DA03/1999) increased the volume of materials that can be processed to a maximum of 45,000 tonnes per year. A review of the conditions of consent found that works were required to be undertaken and therefore a construction certificate was required. There is no evidence on Council's file of a construction certificate having been obtained and this indicates that DA03/1999 has not been acted upon, and has lapsed.

Notwithstanding, the original development consent for the site under DA01/1268 is still valid, however, it limits the processing capacity of the facility to under 30,000 tonnes per year.

Should you wish for the use to continue at up to 45,000 tonnes per annum, you must demonstrate that the consent under DA03/1999 has been lawfully commenced, or lodge another application to increase capacity.

If you wish to increase the processing capacity from 30,000, a fresh development application will need to be lodged, which will be "designated development" as '*Waste Management Facilities or Works.*' Designated

development requires a more involved preparation and assessment process. The Planning Secretary's Environmental Assessment Requirements (SEARs) must be obtained in order for you to prepare an Environmental Impact Statement (EIS) for lodgement with the application. The proposal would also be '*regionally significant development*' in accordance with Schedule 7.7(c) of State Environmental Planning Policy (State and Regional Development) 2011, and the consent authority would be the Sydney South Planning Panel.

2. Proposed rebuilding works

Whether or not lawful commencement of the expanded facility can be demonstrated, a development application for the rebuilding works proposed in this pre-DA can still be lodged. It will need to be determined whether the new application constitutes designated development in its own right.

The legislation under Part 2 of Schedule 3 of the EP&A Regulation 2000 includes provisions relating to alterations and additions to existing designated development, whereby, subject to certain matters being satisfied, the development would not be classified as designated development. Council is required to be satisfied of the matters outlined in cl.35 and cl.36 of Part 2 of Schedule 3 of the EP&A Regulation 2000.

Clause 35 questions whether the alterations and additions will result in a significant increase in the environmental impacts of the total development when compared to the existing approved development and cl.36 includes factors to be taken into consideration by Council when forming its opinion regarding cl.35.

Any future development application must satisfactorily address all parts of cl.36, including, providing sufficient information regarding the "*previous environmental management performance, including compliance with the conditions of any consents, licenses, leases or authorisations by a public authority and compliance with any relevant codes of practice, and….*". This part of cl.36 is particularly important in that it refers to "…*compliance with the conditions of any consents….*". This requires you to demonstrate that the facility has been operating in compliance with the conditions of consent under DA01/1268, or under DA03/1999 if lawful commencement of that consent is demonstrated.

In addition to the factors above, as the risk of fire will be an ongoing concern for the facility (particularly due to the incorrect disposal of lithium batteries by customers), details of how this ongoing risk will be mitigated and managed must be submitted. Clause 36(c) also requires details of how the proposal will *"facilitate compliance with relevant standards, codes of practice or guidelines published by the Department or other public authorities."*

3. BCA considerations

As the proposed works include the rebuilding and alteration of an existing building, cl.94(1)(b) of the Environmental Planning and Assessment Regulation 2000 requires Council to consider the upgrading of the entire existing building. In addition, as the proposal relates to a waste facility, the Fire and Rescue NSW (FRNSW) fire safety guideline "*Fire Safety in Waste Facilities*" applies and is relevant in the cl.94 consideration.

The BCA report submitted for this pre-DA from Concise Certification (Report Revision 2 dated 8/10/2019) is comprehensive and outlines the upgrading required to adequately address BCA2019. This report also mentions the need for the involvement and consultation with FRNSW to ensure their "*Fire Safety in Waste Facilities*" guideline is followed due to the particular hazards present. Council will apply a condition to any future consent issued for the proposed rebuilding that will require the upgrading as proposed in the BCA report and requiring consultation with FRNSW in respect to their guideline.

In terms of documentation for the development application, if the proposed works are varied to that outlined in this pre-DA, e.g. change of roofline, then, it is recommended that the BCA report from be amended so that it is consistent with the works proposed. This will ensure that the BCA report addresses any requirements resulting from any building changes.

Post consent, the upgrade works and the required consultation and involvement of FRNSW are matters that can be resolved by the appropriately Accredited Certifier when considering the future Construction Certificate application.

4. Contaminated Land and Acid Sulfate Soil

The property is listed in Council's contaminated land register (CL00243) as potentially contaminated due to previous and current land uses. There are records in the register detailing the decommissioning of an underground oily waste water pit at the Visy site in 2011. Pre-existing soil contamination may remain onsite, however, as the use of the site will continue as an industrial use, there is no immediate contaminated land risks if the site is to operate as usual and the sealed surfaces of the site are not compromised.

The applicant group outlined that there will be no excavation required to undertake the rebuilding and alterations and that the new steel frame will be attached to the existing floor slabs and footings at the floor level. The drawings and documentation submitted for the development application must clearly indicate that there is to be no excavation for the new works. If excavation is required and documented, additional soil testing and reporting may be required.

In terms of documentation relating acid sulfate soils and contaminated land, cl.6.1 of SSLEP 2015 must be addressed with respect to acid sulfate soils and the requirements of SEPP 55, particularly cl.7 must be addressed in relation to potential contaminated land.

Subject to demonstrating no groundworks, it is anticipated that the forthcoming DA will be conditioned to manage unexpected finds of both acid sulfate soils and contaminated land during works.

5. External referral - EPA

Visy Paper is currently licensed under the Protection of the Environment Operations Act 1997 (POEO Act) for the scheduled activities of 'resource recovery' and 'waste storage' (Licence – 12107).

Prior to the PAD meeting, Council's Environmental Scientist contacted Catherine Falconer from the NSW EPA who is the responsible officer managing the Visy Environmental Protection License. Catherine outlined

that Council was not required to refer the forthcoming DA to the EPA for comment as the development would entail building works and no changes to existing operation i.e. no impact to the EPL conditions.

This matter was discussed at the PAD meeting and Council advised that the applicant should contact the EPA to request a written response to verify that a referral to the EPA would not be necessary for the development assessment.

6. Landscaped Area

It is likely that the deep soil landscaped area on the site is less than 10% of the site area which is the minimum requirement under Council's. The deposited plan for the site indicates a site area of 10,860m^2 which means that 1,086m^2 of landscaping will be required. Any shortfall in landscaped area must be accompanied by a cl.4.6 variation request.

7. Determination Pathway

Given that Council is a client of Visy Recycling, the development application will be referred to the Local Planning Panel for determination so as to provide transparency in the process. Please note that this is subject to firstly demonstrating that the proposal is not designated development, and, secondly, that the factors under cl.35 and cl.36 of Part 2 of Schedule 3 of the EP&A Regulation 2000 are satisfied.

8. Flooding

The property is flood prone according to Council's mapping and flood information has been provided separately to this letter. While it is not expected that this will trigger building works, any future development application must address Chapter 40.c of Council's DCP 2015.

Conclusion:

Council supports quality, well considered development and the comments provided are intended to help you work toward this outcome.

The question whether the existing consent has been lawfully commenced, or, in fact has lapsed, is critical to both the assessment and determination pathway should you wish to operate the facility at a processing capacity greater than 30,000 tonnes per year. This does not preclude you, however, from lodging a development application for the rebuilding works as proposed in this pre-DA.

The proposal involves the rebuilding and possible alteration of a part of the fire damaged building, which, from a built form point of view, is relatively straightforward. The matter of building upgrades for fire safety purposes together with any updated waste management methods and practices is critical for the ongoing safety of employees, the facility and adjoining buildings. It must be demonstrated that the works proposed are 'alterations and additions' and that Council is satisfied of the factors under cl.35 and cl.36 of the EP&A Regulation 2000 in order for the proposal to not be declared designated development.

It is important to note that the information provided in this letter is based on the planning instruments applicable at the time of writing. You should make yourself aware of any subsequent changes to legislation or local planning controls before lodging your development application.

Council strongly recommends that you distribute this letter to all professionals within your design team including architects, landscape architects and engineers.

For detailed information about how to prepare and lodge a development application, please refer to the "Development" section of Council's website (www.sutherlandshire.nsw.gov.au). A “DA Guide” is available and an online tool called “Development Enquirer”, which searches the applicable planning instruments for the planning controls relevant to your site and development.

Development applications can only be lodged through the NSW Planning Portal. When you are ready you will be required to set up a one-off registration in the Portal – go to www.planningportal.nsw.gov.au/user/login

Please contact Council if you believe any of the above information to be incorrect or if you need clarification of the advice provided. Your initial point of contact should be Slavco Bujaroski (9710 0167) as this is Council’s development assessment officer who will most likely be responsible for the assessment of your DA.

Yours faithfully

Peter Barber
Director, Shire Planning

Environment Protection Licence

Licence - 12107

Licence Details	
Number:	12107
Anniversary Date:	22-August

Licensee
VISY PAPER PTY. LTD.
PO BOX 2465
SMITHFIELD NSW 2164

Premises
VISY RECYCLING
43 BAY ROAD
TAREN POINT NSW 2229

Scheduled Activity
Resource recovery
Waste storage

Fee Based Activity	Scale
Recovery of general waste	Any general waste recovered
Waste storage - other types of waste	Any other types of waste stored

Region
Waste & Resource Recovery
59-61 Goulburn Street SYDNEY NSW 2000
Phone: (02) 9995 5000
Fax: (02) 9995 5999
PO Box A290
SYDNEY SOUTH NSW 1232

Environment Protection Licence

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Information about this licence

Dictionary

A definition of terms used in the licence can be found in the dictionary at the end of this licence.

Responsibilities of licensee

Separate to the requirements of this licence, general obligations of licensees are set out in the Protection of the Environment Operations Act 1997 ("the Act") and the Regulations made under the Act. These include obligations to:

- ensure persons associated with you comply with this licence, as set out in section 64 of the Act;
- control the pollution of waters and the pollution of air (see for example sections 120 - 132 of the Act);
- report incidents causing or threatening material environmental harm to the environment, as set out in Part 5.7 of the Act.

Variation of licence conditions

The licence holder can apply to vary the conditions of this licence. An application form for this purpose is available from the EPA.

The EPA may also vary the conditions of the licence at any time by written notice without an application being made.

Where a licence has been granted in relation to development which was assessed under the Environmental Planning and Assessment Act 1979 in accordance with the procedures applying to integrated development, the EPA may not impose conditions which are inconsistent with the development consent conditions until the licence is first reviewed under Part 3.6 of the Act.

Duration of licence

This licence will remain in force until the licence is surrendered by the licence holder or until it is suspended or revoked by the EPA or the Minister. A licence may only be surrendered with the written approval of the EPA.

Licence review

The Act requires that the EPA review your licence at least every 5 years after the issue of the licence, as set out in Part 3.6 and Schedule 5 of the Act. You will receive advance notice of the licence review.

Fees and annual return to be sent to the EPA

For each licence fee period you must pay:

- an administrative fee; and
- a load-based fee (if applicable).

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The EPA publication “A Guide to Licensing” contains information about how to calculate your licence fees. The licence requires that an Annual Return, comprising a Statement of Compliance and a summary of any monitoring required by the licence (including the recording of complaints), be submitted to the EPA. The Annual Return must be submitted within 60 days after the end of each reporting period. See condition R1 regarding the Annual Return reporting requirements.

Usually the licence fee period is the same as the reporting period.

Transfer of licence

The licence holder can apply to transfer the licence to another person. An application form for this purpose is available from the EPA.

Public register and access to monitoring data

Part 9.5 of the Act requires the EPA to keep a public register of details and decisions of the EPA in relation to, for example:

- licence applications;
- licence conditions and variations;
- statements of compliance;
- load based licensing information; and
- load reduction agreements.

Under s320 of the Act application can be made to the EPA for access to monitoring data which has been submitted to the EPA by licensees.

This licence is issued to:

VISY PAPER PTY. LTD.
PO BOX 2465
SMITHFIELD NSW 2164

subject to the conditions which follow.

Environment Protection Licence

Licence - 12107

1 Administrative Conditions

A1 What the licence authorises and regulates

A1.1 This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.

Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.

Scheduled Activity	Fee Based Activity	Scale
Resource recovery	Recovery of general waste	Any general waste recovered
Waste storage	Waste storage - other types of waste	Any other types of waste stored

A2 Premises or plant to which this licence applies

A2.1 The licence applies to the following premises:

Premises Details
VISY RECYCLING
43 BAY ROAD
TAREN POINT
NSW 2229
LOT 123 DP 815747

A3 Information supplied to the EPA

A3.1 Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence.

In this condition the reference to "the licence application" includes a reference to:
a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and
b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.

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2 Discharges to Air and Water and Applications to Land

P1 Location of monitoring/discharge points and areas

P1.1 The following points referred to in the table below are identified in this licence for the purposes of weather and/or noise monitoring and/or setting limits for the emission of noise from the premises.

Noise/Weather

EPA identification no.	Type of monitoring point	Location description
1	Noise monitoring	27 Alexander Avenue, Taren Point
2	Noise monitoring	79 Woodlands Road Taren Point
3	Noise monitoring	154 Holt Road, Taren Point

3 Limit Conditions

L1 Pollution of waters

L1.1 Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.

L2 Waste

L2.1 The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled “Waste” and meeting the definition, if any, in the column titled “Description” in the table below.
Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled “Activity” in the table below.
Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled “Other Limits” in the table below.
This condition does not limit any other conditions in this licence.

Code	Waste	Description	Activity	Other Limits
NA	Metal waste	As defined in Schedule 1 of the POEO Act, in force from time to time.	Resource recovery Waste storage	N/A
NA	Glass, plastic, paper or cardboard	As defined in Schedule 1 of the POEO Act, in force from time to time.	Resource recovery Waste storage	N/A

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L2.2 The authorised amount of waste permitted on the premises cannot exceed 1,500 tonnes at any one time.

L3 Noise limits

L3.1 Noise generated at the premises that is measured at each noise monitoring point established under this licence must not exceed the noise levels specified in Column 4 of the table below for that point during the corresponding time periods specified in Column 1 when measured using the corresponding measurement parameters listed in Column 2.

POINT 1

Time period	Measurement parameter	Measurement frequency	Noise level dB(A)
Day	LAeq (15 minute)	n/a	48
Evening	LAeq (15 minute)	n/a	43
Night	LAeq (15 minute)	n/a	39
Night	LAeq(period)	n/a	43
Night	Night-LA1 (1 minute)	n/a	47

POINT 2

Time period	Measurement parameter	Measurement frequency	Noise level dB(A)
Day	LAeq (15 minute)	n/a	55
Evening	LAeq (15 minute)	n/a	53
Evening	LAeq(period)	n/a	44
Night	LAeq (15 minute)	n/a	39
Night	LAeq(period)	n/a	39
Night	Night-LA1 (1 minute)	n/a	49

POINT 3

Time period	Measurement parameter	Measurement frequency	Noise level dB(A)
Day	LAeq (15 minute)	n/a	53
Evening	LAeq (15 minute)	n/a	48
Night	LAeq (15 minute)	n/a	40
Night	LAeq(period)	n/a	39
Night	Night-LA1 (1 minute)	n/a	50

L3.2 For the purpose of condition L3.1:
Day is defined as the period from 7am to 6pm Monday to Saturday and 8am to 6pm Sundays and Public Holidays
Evening is defined as the period from 6pm to 10pm
Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sundays and Public Holidays

L3.3 Noise from the premise is to be measured at the most affected point within the residential boundary, or at the most affected point within 30 metres of the dwelling where the dwelling is more than 30 metres from the boundary, to determine compliance with the noise level limits in Condition L3.1.

Where it can be demonstrated that direct measurement of noise from the premises is impractical, the EPA may accept alternative means of determining compliance. See Chapter 11 of the NSW Industrial Noise Policy (2000).

The modification factors presented in Factsheet C of the Noise Policy for Industry 2017 shall also be applied to the measured noise levels where applicable.

L3.4 The noise emission limits listed at Condition L3.1 apply under meteorological conditions of wind speed up to 3 metres per second at 10 metres above ground level, and temperature inversion conditions.

L4 Potentially offensive odour

L4.1 The licensee must not cause or permit the emission of offensive odour beyond the boundary of the premises.

Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.

4 Operating Conditions

O1 Activities must be carried out in a competent manner

O1.1 Licensed activities must be carried out in a competent manner.
This includes:
a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and
b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.

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O2 Maintenance of plant and equipment

O2.1 All plant and equipment installed at the premises or used in connection with the licensed activity:
a) must be maintained in a proper and efficient condition; and
b) must be operated in a proper and efficient manner.

O3 Dust

O3.1 The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.

O3.2 Activities must be carried out in a manner that minimises the generation of dust.

O3.3 Trucks entering and leaving the premises that are carrying loads must be covered at all times, except during loading and unloading.

O3.4 The Licensee must ensure that no material, including sediment or oil, is tracked onto the public road from the premises.

O4 Emergency response

O4.1 The licensee must maintain, and implement as necessary, a current Pollution Incident Response Management Plan (PIRMP) for the premises.

The licensee must keep the PIRMP on the premises at all times. The PIRMP must document systems and procedures to deal with all types of incidents (e.g. spills, explosions or fire) that may occur at the premises or that may be associated with activities that occur at the premises and which are likely to cause harm to the environment.

The licensee must develop the PIRMP in accordance with the requirements in Part 5.7A of the Protection of the Environment Operations (POEO) Act 1997 and POEO regulations.

O5 Processes and management

O5.1 Any waste for processing, storage or resource recovery at the premises must be assessed and classified in accordance with the *EPA Waste Classification Guidelines* as in force from time to time.

O6 Other operating conditions

O6.1 Activities being conducted at the premises must be carried out in a manner that will prevent litter escaping from the premises.

Environment Protection Licence

Licence - 12107

5 Monitoring and Recording Conditions

M1 Monitoring records

M1.1 The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.

M1.2 All records required to be kept by this licence must be:
a) in a legible form, or in a form that can readily be reduced to a legible form;
b) kept for at least 4 years after the monitoring or event to which they relate took place; and
c) produced in a legible form to any authorised officer of the EPA who asks to see them.

M1.3 The following records must be kept in respect of any samples required to be collected for the purposes of this licence:
a) the date(s) on which the sample was taken;
b) the time(s) at which the sample was collected;
c) the point at which the sample was taken; and
d) the name of the person who collected the sample.

M2 Recording of pollution complaints

M2.1 The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.

M2.2 The record must include details of the following:
a) the date and time of the complaint;
b) the method by which the complaint was made;
c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;
d) the nature of the complaint;
e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and
f) if no action was taken by the licensee, the reasons why no action was taken.

M2.3 The record of a complaint must be kept for at least 4 years after the complaint was made.

M2.4 The record must be produced to any authorised officer of the EPA who asks to see them.

M3 Telephone complaints line

M3.1 The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.

M3.2 The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.

M3.3 The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.

6 Reporting Conditions

R1 Annual return documents

R1.1 The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:

1. a Statement of Compliance,
2. a Monitoring and Complaints Summary,
3. a Statement of Compliance - Licence Conditions,
4. a Statement of Compliance - Load based Fee,
5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan,
6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and
7. a Statement of Compliance - Environmental Management Systems and Practices.

At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.

R1.2 An Annual Return must be prepared in respect of each reporting period, except as provided below.

R1.3 Where this licence is transferred from the licensee to a new licensee:
a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and
b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.

R1.4 Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on:
a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or
b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.

R1.5 The Annual Return for the reporting period must be supplied to the EPA via eConnect *EPA* or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').

R1.6 The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.

R1.7 Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by:
a) the licence holder; or
b) by a person approved in writing by the EPA to sign on behalf of the licence holder.

Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.

Note: An application to transfer a licence must be made in the approved form for this purpose.

R2 Notification of environmental harm

R2.1 Notifications must be made by telephoning the Environment Line service on 131 555.

R2.2 The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.

Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.

R3 Written report

R3.1 Where an authorised officer of the EPA suspects on reasonable grounds that:
a) where this licence applies to premises, an event has occurred at the premises; or
b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence,
and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.

R3.2 The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.

R3.3 The request may require a report which includes any or all of the following information:
a) the cause, time and duration of the event;
b) the type, volume and concentration of every pollutant discharged as a result of the event;
c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event;
d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;
e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants;
f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and
g) any other relevant matters.

R3.4 The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.

Environment Protection Licence

Licence - 12107

7 General Conditions

G1 Copy of licence kept at the premises or plant

G1.1 A copy of this licence must be kept at the premises to which the licence applies.

G1.2 The licence must be produced to any authorised officer of the EPA who asks to see it.

G1.3 The licence must be available for inspection by any employee or agent of the licensee working at the premises.

8 Pollution Studies and Reduction Programs

U1 PRP 1 - Operational Noise Management Plan

U1.1 An Operational Noise Management Plan (ONMP) shall be developed , implemented and submitted to the EPA's Manager Sydney Waste at PO Box A290, Sydney South, 1232 within three months of the commencement of night-time operations at the premises. The ONMP shall include, but not be limited to, the following:

a) Identification of best management noise practices to control night-time noise emissions;

b) Protocols to ensure that roller doors are closed during the night-time period to the extent that is operationally possible;

c) Limitations on external activities (including truck movements) to control external noise emissions;

d) Plans and implementation of driver and operator training to limit noise associated with mobile plant and motor vehicle movements;

e) Protocols to limit audible reversing alarms during the night-time period; and

f) Identification of 'noisy' activities that can be confined to daytime/ evening periods or that can be undertaken in locations that will limit night-time noise emissions.

U2 PRP 2 - Noise Compliance Monitoring

U2.1 A noise compliance assessment report shall be submitted to the EPA's Director Waste and Resource Recovery Branch at PO Box A290, Sydney South, 1232 within three months of the commencement of night-time operations at the premises and annually thereafter. The report shall be prepared by a suitably qualified acoustical consultant. The noise compliance assessment shall include, but not be limited to, a comparison of actual noise levels from the premises with:

a) Noise limits from condition L 3.1; and

b) Sleep disturbance criterion from condition L3.1.

9 Special Conditions

E1 Environmental obligations of Licensee

E1.1 While the licensee's premises are being used for the purpose to which the licence relates, the licensee must:
a) Clean up any spill, leak or other discharge of any waste(s) or other material(s) as soon as practicable after it becomes known to the licensee or to one of the licensee's employees or agents.
b) In the event(s) that any liquid and non-liquid waste(s) is unlawfully deposited on the premises, such waste(s) must be removed and lawfully disposed of as soon as practicable or in accordance with any direction given by the EPA.
c) Provide all monitoring data as required by the conditions of this licence or as directed by the EPA.

E1.2 In the event of an earthquake, storm, fire, flood or any other event where it is reasonable to suspect that a pollution incident has occurred, is occurring or is likely to occur, the licensee (whether or not the premises continue to be used for the purposes to which the licence relates) must:
a) make all efforts to contain all firewater on the licensee's premises,
b) make all efforts to control air pollution from the licensee's premises,
c) make all efforts to contain any discharge, spill or run-off from the licensee's premises,
d) make all efforts to prevent flood water entering the licensee's premises,
e) remediate and rehabilitate any exposed areas of soil and/or waste,
f) lawfully dispose of all liquid and solid waste(s) stored on the premises that is not already securely disposed of,
g) at the request of the EPA monitor groundwater beneath the licensee's premises and its potential to migrate from the licensee's premises,
h) at the request of the EPA monitor surface water leaving the licensee's premises; and
i) ensure the licensee's premises is secure.

E1.3 After the licensee's premises cease to be used for the purpose to which the licence relates or in the event that the licensee ceases to carry out the activity that is the subject of this licence, that licensee must:
a) remove and lawfully dispose of all liquid and non-liquid waste stored on the licensee's premises; and
b) rehabilitate the site, including conducting an assessment of and if required remediation of any site contamination.

Environment Protection Licence

Licence - 12107

Dictionary

General Dictionary

3DGM [in relation to a concentration limit]	Means the three day geometric mean, which is calculated by multiplying the results of the analysis of three samples collected on consecutive days and then taking the cubed root of that amount. Where one or more of the samples is zero or below the detection limit for the analysis, then 1 or the detection limit respectively should be used in place of those samples
Act	Means the Protection of the Environment Operations Act 1997
activity	Means a scheduled or non-scheduled activity within the meaning of the Protection of the Environment Operations Act 1997
actual load	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2009
AM	Together with a number, means an ambient air monitoring method of that number prescribed by the *Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales*.
AMG	Australian Map Grid
anniversary date	The anniversary date is the anniversary each year of the date of issue of the licence. In the case of a licence continued in force by the Protection of the Environment Operations Act 1997, the date of issue of the licence is the first anniversary of the date of issue or last renewal of the licence following the commencement of the Act.
annual return	Is defined in R1.1
Approved Methods Publication	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2009
assessable pollutants	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2009
BOD	Means biochemical oxygen demand
CEM	Together with a number, means a continuous emission monitoring method of that number prescribed by the *Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales*.
COD	Means chemical oxygen demand
composite sample	Unless otherwise specifically approved in writing by the EPA, a sample consisting of 24 individual samples collected at hourly intervals and each having an equivalent volume.
cond.	Means conductivity
environment	Has the same meaning as in the Protection of the Environment Operations Act 1997
environment protection legislation	Has the same meaning as in the Protection of the Environment Administration Act 1991
EPA	Means Environment Protection Authority of New South Wales.
fee-based activity classification	Means the numbered short descriptions in Schedule 1 of the Protection of the Environment Operations (General) Regulation 2009.
general solid waste (non-putrescible)	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997

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flow weighted composite sample	Means a sample whose composites are sized in proportion to the flow at each composites time of collection.
general solid waste (putrescible)	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environmen t Operations Act 1997
grab sample	Means a single sample taken at a point at a single time
hazardous waste	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
licensee	Means the licence holder described at the front of this licence
load calculation protocol	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2009
local authority	Has the same meaning as in the Protection of the Environment Operations Act 1997
material harm	Has the same meaning as in section 147 Protection of the Environment Operations Act 1997
MBAS	Means methylene blue active substances
Minister	Means the Minister administering the Protection of the Environment Operations Act 1997
mobile plant	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
motor vehicle	Has the same meaning as in the Protection of the Environment Operations Act 1997
O&G	Means oil and grease
percentile [in relation to a concentration limit of a sample]	Means that percentage [eg.50%] of the number of samples taken that must meet the concentration limit specified in the licence for that pollutant over a specified period of time. In this licence, the specified period of time is the Reporting Period unless otherwise stated in this licence.
plant	Includes all plant within the meaning of the Protection of the Environment Operations Act 1997 as well as motor vehicles.
pollution of waters [or water pollution]	Has the same meaning as in the Protection of the Environment Operations Act 1997
premises	Means the premises described in condition A2.1
public authority	Has the same meaning as in the Protection of the Environment Operations Act 1997
regional office	Means the relevant EPA office referred to in the Contacting the EPA document accompanying this licence
reporting period	For the purposes of this licence, the reporting period means the period of 12 months after the issue of the licence, and each subsequent period of 12 mo nths. In the case of a licence continued in force by the Protection of the Environment Operations Act 1997, the date of issue of the licence is the first anniversary of the date of issue or last renewal of the licence following the commencement of the Act.
restricted solid waste	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
scheduled activity	Means an activity listed in Schedule 1 of the Protection of the Environment Operations Act 1997
special waste	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
TM	Together with a number, means a test method of that number prescribed by the *Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales*.

Environment Protection Licence

Licence - 12107

TSP	Means total suspended particles
TSS	Means total suspended solids
Type 1 substance	Means the elements antimony, arsenic, cadmium, lead or mercury or any compound containing one or more of those elements
Type 2 substance	Means the elements beryllium, chromium, cobalt, manganese, nickel, selenium, tin or vanadium or any compound containing one or more of those elements
utilisation area	Means any area shown as a utilisation area on a map submitted with the application for this licence
waste	Has the same meaning as in the Protection of the Environment Operations Act 1997
waste type	Means liquid, restricted solid waste, general solid waste (putrescible), general solid waste (non-putrescible), special waste or hazardous waste

Ms Susanna Savolainen

Environment Protection Authority

(By Delegation)

Date of this edition: 22-August-2005

End Notes

1	Condition A1.3 Not applicable varied by notice issued on <issue date> which came into effect on <effective date>
2	Licence varied by notice 1096900, issued on 22-Jan-2009, which came into effect on 22-Jan-2009.
3	Licence varied by Correction to EPA Region data record., issued on 23-Jun-2010, which came into effect on 23-Jun-2010.
4	Licence varied by notice 1551778 issued on 30-May-2018

Appendix E – Environmental management and mitigation measures table

Environmental management and mitigation measures	Timing
Traffic A comprehensive workplace travel plan (WTP) to encourage the use of public transport and alternative modes of transportation, with the following primary objectives: • to promote the use of sustainable transport methods, thus reducing congestion and pollution in the local area; • to promote Visy as an innovative and environmentally aware organisation; and • provide an active environment by encouraging healthier travel options for staff, such as walking and cycling.	Pre-construction Operational
Noise The following 'standard' noise management measures will be implemented during operations to minimise the potential for noise impacts: • the MRF plant can operate during all periods (day, evening, and night); • the two roller doors located on the south side, close to the eastern wall, are to be shut during night-time (ie 10:00 pm to 5:00 am) • operation when access to the eastern door is not required; and • front end loader should only operate inside the warehouse (not outside the warehouse) during night-time (ie 10:00 pm and 5:00am).	Operational
Air Quality Notwithstanding, all reasonable and feasible measures to reduce air emissions will be incorporated within the OEMP and will include: • engines of vehicles and plant to be switched off when not it use; • vehicles and plant to be fitted with pollution reduction devices where practicable; • vehicles and plant to be maintained in accordance with manufacturer's specifications; • trafficable areas to be swept/cleaned regularly; • vehicles restricted to designated routes; and • on-site speed limits enforced.	Operational
Hazard and Risk Management A range of hazard control measures will be implemented during operation of the facility. Each of these will be appropriate for the hazard they are designed to control and will generally follow the *Hierarchy of Hazard Controls* (WorkCover NSW not dated), including: • engineering controls: • enclosure: components will be enclosed as appropriate. • administrative controls: • operating procedures; • scheduled maintenance; and • training and reinforcing correct work procedures.	Operational

Environmental management and mitigation measures	Timing
Storage and use of hazardous materials will be in accordance with the following Australian Standards: • *Australian Standard 1940:2004 The Storage and Handling of Flammable and Combustible Liquids*; and • *Australian Standard 1596:2008 The Storage and Handling of LP Gas*.	
Flood Management With the implementation of the following flood measures the proposed development will be acceptable from a flooding perspective and addressees Council's requirements: • hazardous items shall be stored on a pallet or on the hard stand in accordance with the storage arrangements detailed in Table 6.31; • the flood evacuation plan shall be incorporated within the site's OEMP.	Operational

Mobius Fire Safety P/L
Suite 13, 165 Argyle Street
Camden, NSW 2570
M: 0452 662 487
ABN: 14 167 027 072

Urban Perspectives Pty Limited
Suite 405, Level 4
88 Foveaux Street
Surry Hills NSW 2010

Att: John Arnold
Date: 01 June 2022
Re: Development Application - Letter of Support
Project: 43 Bay Road, Taren Point NSW 2229

Dear John,

Mobius Fire Safety P/L has been appointed by Visy Recycling to undertake a Fire Engineering review for the proposed increase on waste throughput from 30kt/pa to 60kt/pa in Units 1 and 2 of the existing industrial building at 43 Bay Road, Taren Point NSW 2229.

The existing base building FER by Mobius Fire Safety P/L ref:19245 R1.6 dated 11.09.2020 addressed a number of deviations to the Deemed-to-Satisfy (DtS) Provisions as follows:

Item	Description of departures from DtS Provisions	DtS Provision	Performance Requirements
1	Permit steel clad external gabled wall above large opening in the Visy tenancy (Grid 1) to be provided with wall-wetting sprinklers in lieu of an FRL of 240/240/240	C1.1 and Table 4	CP1, CP2 and CP8
2	Permit performance based protection of external walls in proximity to adjacent fire compartments	C3.3	CP2 and CP8
3	Permit fire shutter that is provided with wall-wetting sprinklers in lieu of tested insulation resistance.	C3.5	CP2
4	Permit reduced egress width throughout the egress routes in the building of less than 1,000 mm (down to 850 mm)	D1.6	DP6
5	Permit the width of the route from exit discharge to be less than 1,000 mm	D1.10	DP6
6	Permit the sprinkler booster to be located at the sprinkler pump/tank which is not at the principle vehicular entry to the site	Spec E1.5 and AS 2118.1-2017	EP1.4
7	Permit performance based smoke hazard management from Unit 1/1A ('Visy Recycling' tenancy)	E2.3	EP2.2

I have undertaken a review of the assessments, assumptions and limitations of the abovementioned FER and confirm that the increase in production from 30kt/pa to 60kt/pa do not have an adverse impact on the Trial Design or the assessments made in the FER.

This is limited to the increase of production resulting from increased hours of operation only. Any increase in stockpiling volume or management must be reviewed against the current requirements of the National Construction Code: Building Code of Australia 2019 Amendment 1 and FRNSW Fire Safety Guidelines: Fire Safety in Waste Facilities.

In conclusion the proposed increase in production intensity is not expected to have an adverse impact on the based building assessment in the existing FER.

If you have any questions in relation to this information, please call the undersigned.

Kind Regards,

Daniel Turhanlar | ME(Fire Safety) | MB(Ops Management) | MSFS | MAAC
Registered Certifier (Fire Safety) NSW: C10 BDC2150 | VIC: PE0001542 | QLD: RPEQ 15657
Accredited Practitioner (Fire Safety): F009490D
Registered Design Practitioner (Fire Safety Engineering): DEP0000033
Director
Mobius Fire Safety Pty Ltd
0452 662 487
daniel@mobiusfire.com.au
www.mobiusfire.com.au

A5.1 FLOOD

PERSONNEL AUTHORISED TO IMPLEMENT PLAN

The Visy personnel authorised to implement this procedure.

Chief Warden	Jake Luschwitz	Site Manager	0499 986 272
Site Warden	Patricia Hikaka	Site Supervisor	0435 033 244
Area Warden	Binh Tran	Operator	0402 256 143

COMMUNICATION AND WARNING TIME

- In the event of a heavy rainfall, SES and media (local radio/media/web) outlets should be monitored for information regarding expected flood levels and extent of flooding.
- Significant storm water flooding warning time may only be approximately 30 minutes.

Bureau of Meteorology (BoM) Rainfall and River Conditions	http://www.bom.gov.au/australia/flood/
Bureau of Meteorology (BoM) National Warnings Summary	http://www.bom.gov.au/australia/warnings/?ref=ftr
ABC Sydney Radio	702 AM

BOM FLOOD WARNING SERVICES

A **Flood Watch** is issued when forecast rainfall information suggests that local and/or riverine flooding is possible across the Flood Watch area. A Flood Watch may cover a large area due to uncertainty associated with the location and amount of forecast rainfall.

A **Flood Warning** is issued when the Bureau is more certain that flooding is expected, often when rainfall has started to fall. Flood Warnings are more targeted and are issued for specific catchments or even sub-catchments in some of the larger river basins. Flood Warnings will generally include specific predictions of the severity of expected flooding.

There will be occasions when a Flood Warning is issued without it being preceded by a Flood Watch, largely due to the complexities of forecasting rainfall accurately.

PASSIVE CONTROLS

The site is bunded to a level of 2.45m above sea level which will help keep the site from flooding in the event of a local flood event, given that the main stormwater valve is closed. Although, if raining, the closed stormwater valve will prevent water from leaving the site.

EMERGENCY CONTROL ORGANISATION ACTIONS

EARLY EVACUATION PROCEDURE

If notified that a flood is expected in no sooner than 30 minutes contact the Chief Warden (Your manager) If instructed to enact a flood evacuation, perform the following tasks in order:

1. Follow the shut-down procedure for any plant and equipment
2. Meet with all site occupants in a safe area
3. Ensure everyone is accounted for
4. Instruct non-Visy staff and non-essential Visy staff to vacate the property via the evacuation route
5. Move any powered mobile equipment indoors away from any recycling material
6. Close the fire shutter between unit 1A and unit 2
7. Ensure all potentially hazardous items are secure
    - Oil drums have caps on
    - Diesel tank is closed and secure
    - Battery disposal bin is sealed
    - Gas cylinders are secure
8. Close the stormwater isolation valve
9. Ensure all doors are closed and locked
10. Turn off the electricity at the main switchboard (essential services will remain on)
11. Ensure fire protection systems are online and functional by checking the FIP
12. Ensure it is safe to evacuate by checking the warnings on local media and the BoM website.

The internal flood evacuation route is shown in Figure 1.

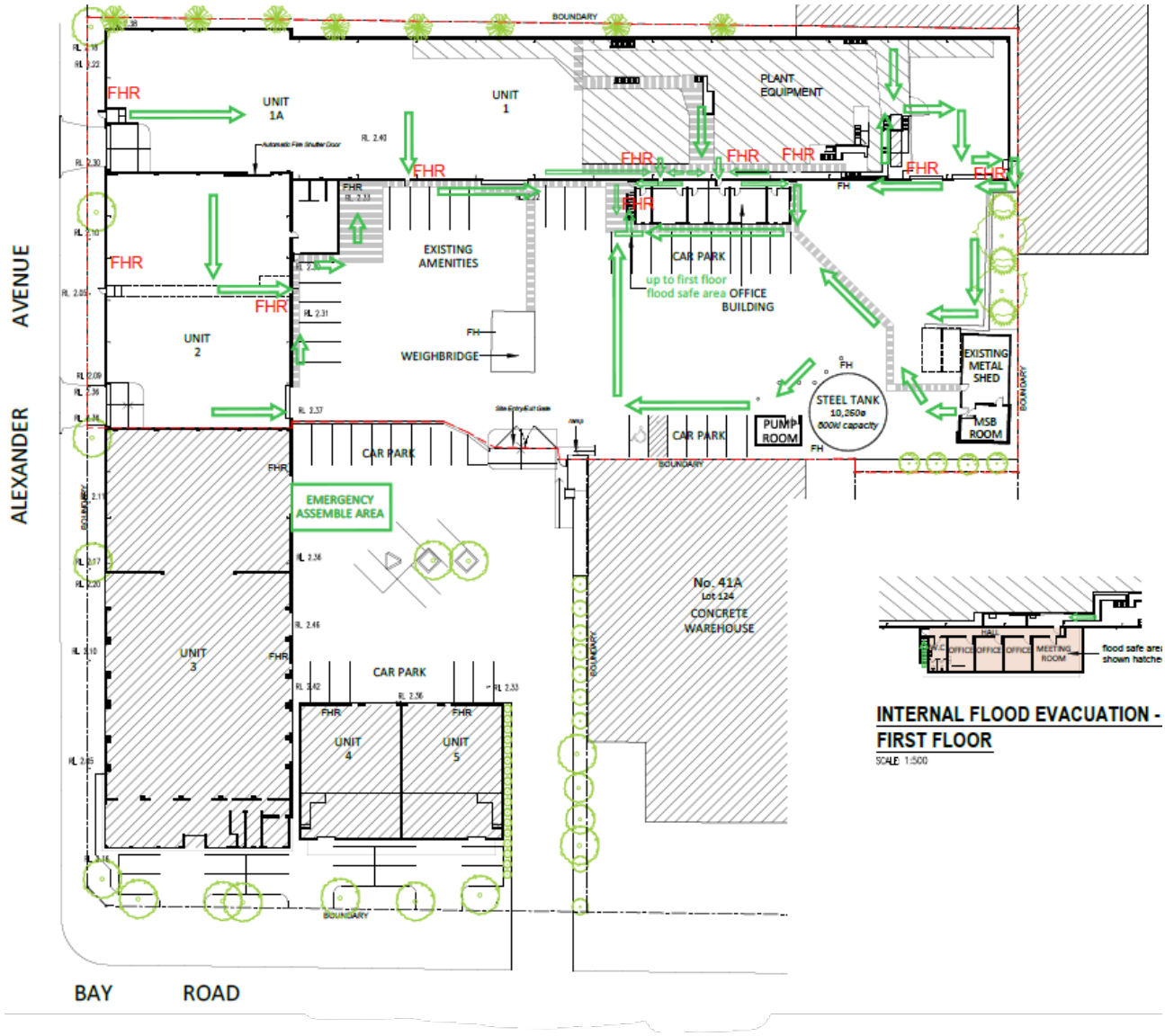

Figure 1 – Internal flood evacuation route (Source: Archispectrum)

SEEK SHELTER PROCEDURE

If a flood is imminent or is occurring, the Emergency Control Organisation personnel should:

1. Follow the emergency shutdown procedure for any plant and equipment
2. Meet with all site occupants in the level 1 office area
3. Ensure everyone is accounted for
4. Notify the Chief Warden
5. Follow Chief Warden's instructions
6. If safe to do so, perform the following:
   a. Move any powered mobile equipment indoors away from any recycling material
   b. Close the fire shutter between unit 1A and unit 2
   c. Ensure all potentially hazardous items are secure
      - Oil drums have caps on
      - Diesel tank is closed and secure
      - Battery disposal bin is sealed
      - Gas cylinders are secure
   d. Close the stormwater isolation valve
   e. Ensure all doors are closed and locked

f. Turn off the electricity at the main switchboard (essential services will remain on)
g. Ensure fire protection systems are online and functional by checking the FIP

7. Return to the Level 1 office area, report to the chief warden and monitor local media

STORMWATER VALVE OPERATION

The stormwater isolation valve can be operated from the electrical panel to the right as you enter the sprinkler pump room. The pump room will need to be opened with a 003 key.

1. Retrieve the 003 key from the key box in the Supervisor's office.
2. Open the sprinkler pump room door
3. Retrieve the key from the hook in the electrical panel to your left
4. Use the key to switch the stormwater valve to Closed and remove the key
5. Check that the red indicator light on the panel is on
6. Place the key back on the hook.

EVACUATION ROUTE

Turn on your radio to a local station (ABC Sydney 702 AM) and if safe to do so:

1. Drive out of the driveway
2. LEFT on to Bay Road
3. RIGHT at the round-a-bout on to Atkinson Road
4. RIGHT on to Parraweena Road
5. LEFT at the round-a-bout onto Cawarra Road
6. RIGHT at the lights at Captain Cook Drive
7. LEFT on to Taren Point Road
8. RIGHT on to the Kingsway
9. The Kingsway will take you to the Princes Highway

NOTE: Driving North via Taren Point Road is not recommended as this may cause you to enter another flood-prone region.

The external flood evacuation route is shown in Figure 2.

Figure 2 – External flood evacuation route (Source: Google Earth)

AFTER THE FLOOD EMERGENCY

Once the BoM or SES has given the all clear:

- The stormwater valve should be opened after the water on the street has receded or is receding so the yard can be drained of water ASAP.
- Evaluate and report back to the Chief Warden of any damage to structures, plant, equipment, electrical wiring or other infrastructure
- Prioritise clean up actions
- Contact support sub-contractors to assist in post-flood repairs:

a.	Electrical	One Touch Automation	Peter	0418 970 279
b.	Mechanical/Structural repairs	C&I Services	Graeme	0418 448 626
c.	Plumbing	Moxham Plumbing	Steve	0417 221 224
d.	Labour Hire	APG	Lauren	0477 115 773

SITE AND FLOOD INFORMATION

The Gnawley River Flood Report (2012) shows that the site is not estimated to be affected by a 20 year flood event, although the surrounding roads may be.

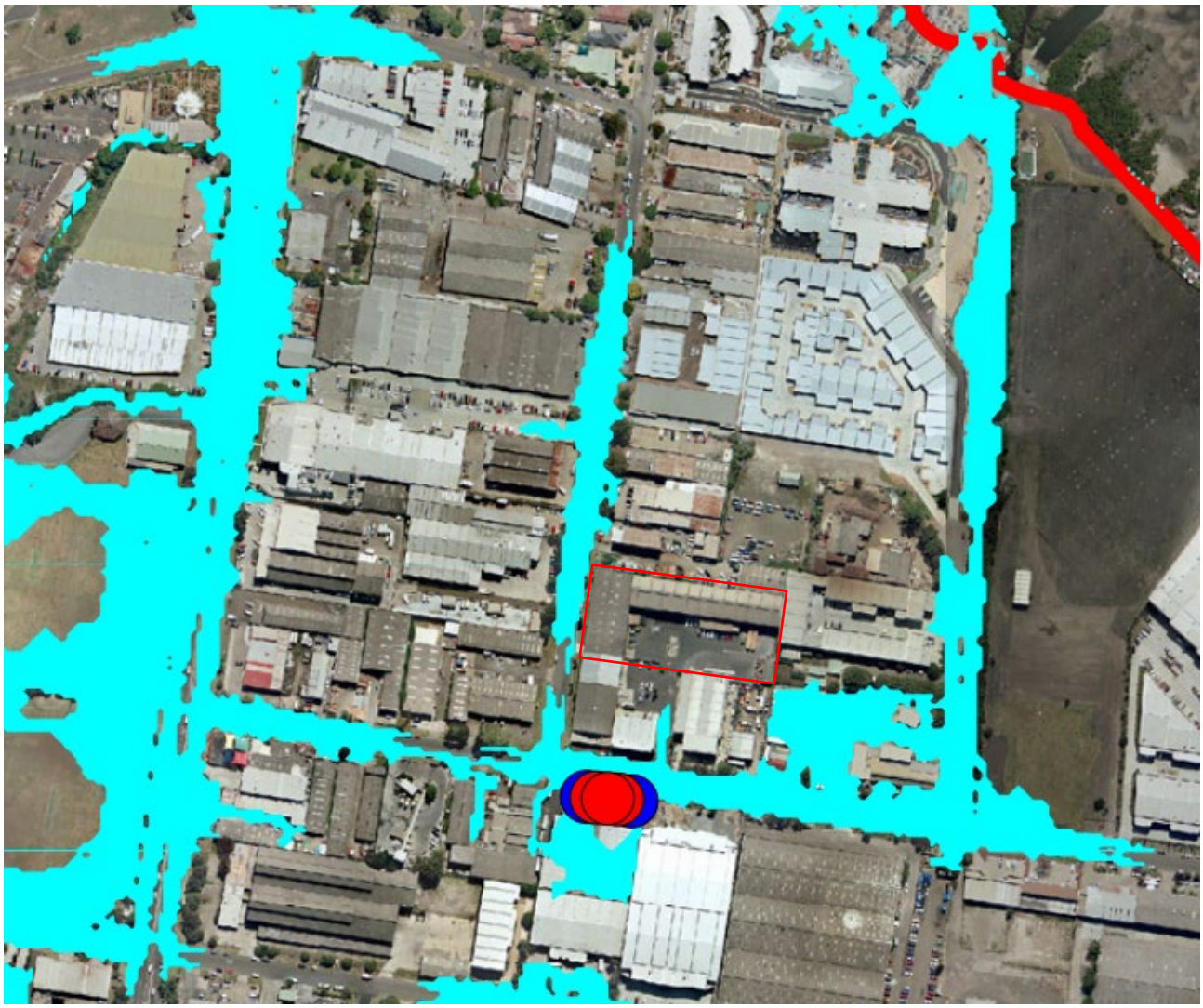

Figure 3 - Areas affected by a 20 Year Flood Event - Gnawley River Flood Report (2012) [Visy Taren Point in red box]

Even during a 100 year flood event, the Gnawley River Flood Report (2012) indicates that 43 Bay Road is unlikely to flood, with the water level reaching 2 mAHD (above the average Australian sea level) causing some surrounding roads to be submerged up to 0.6 m deep in some places

Figure 4 - Areas affected by a 100 Year Flood Event - Gnawley River Flood Report (2012) [Visy Taren Point in red box]

A5.2 SEVERE STORM DAMAGE

If a severe storm occurs or is likely to occur, the Chief Warden should:

- Ensure all loose items external to the building such as, metal sheeting, empty containers, timber etc are stored or secured
- Advise occupants to remain indoors away from any doors or windows
- Advise occupants to keep all exit and roller shutter doors shut during the storm
- Advise all mobile cranes, boom-lifts and other elevated platforms to cease operation and ensure equipment has been secured
- Ensure any work at height or outdoors is ceased immediately
- Follow all emergency services media advice on the emergency
- Gain information from Bureau Of Meteorology website to monitor current and changing weather data
- Keep occupants informed of the emergency situation
- Consider isolating or shutting off electricity supply
- Arrange for first aid officers to be on standby to monitor injuries
- Immediately report any dangerous situations to the Emergency Services immediately (e.g. loose roof sheet, damaged steam or gas pipe, broken electrical cables etc)
- After the emergency, evaluate any damage to structures, plant, equipment, electrical wiring or other infrastructure

Appendix B – SEARs Compliance Table

Aspect	Description	Document Reference
General Requirements	The Environmental Impact Statement (EIS) must meet the minimum form and content requirements in clauses 6 and 7 of Schedule 2 of the Environmental Planning and Assessment Regulation 2000	Section 4.1.2, Table 4.2
Key Issues	The EIS must include an assessment of all potential impacts of the proposed development on the existing environment (including cumulative impacts if necessary) and develop appropriate measures to avoid, minimise, mitigate and/or manage these potential impacts. As part of the EIS assessment, the following matters must also be addressed.	Chapter 6 Impact Assessment
Strategic and statutory context	a detailed justification for the proposal and suitability of the site for the development a demonstration that the proposal is consistent with all relevant planning strategies, environmental planning instruments, development control plans (DCPs), or justification for any inconsistencies−a list of any approvals that must be obtained under any other Act or law before the development may lawfully be carried out. a description of how the proposed expansion integrates with existing on-site operations a description of any amendments to and/ or additional licence(s) or approval(s) required to carry out the proposed development.	Chapter 2 Strategic Context Chapter 4 Statutory Context
Suitability of the site	a detailed justification that the site can accommodate the proposed processing capacity, having regard to the scope of the operations and its environmental impacts and relevant mitigation measures floor plans depicting the proposed facility layout, including the location of machinery, equipment and waste stockpile locations.	Section 2.1 and Section 2.3 Architectural Plans (Appendix C)
Waste Management	details of the type, quantity and classification of waste to be received at the site details of the resource outputs and any additional processes for residual waste details of waste handling including transport, identification, receipt, stockpiling and quality control the measures that would be implemented to ensure that the proposed development is consistent with the aims, objectives and guidelines in the NSW Waste Avoidance and Resource Recovery Strategy 2014-21.	Chapter 3 Project Description
Hazards and risk	a preliminary risk screening completed in accordance with State Environmental Planning Policy No. 33 – Hazardous and Offensive Development and Applying SEPP 33 (DoP, 2011), with a clear indication of class, quantity and location of all dangerous goods and hazardous materials associated with the development. Should preliminary screening indicate that the project is "potentially hazardous" a Preliminary Hazard Analysis (PHA) must be prepared in accordance with Hazardous Industry Planning Advisory Paper No. 6 - Guidelines for Hazard Analysis (DoP, 2011) and Multi-Level Risk Assessment (DoP, 2011).	Section 6.4

Aspect	Description	Document Reference
Fire and incident management	technical information on the environmental protection equipment to be installed on the premises such as air, water and noise controls, spill clean-up equipment, fire management (including the location of fire hydrants and water flow rates at the hydrants) and containment measures details of the size and volume of stockpiles and their arrangements to minimise fire spread and facilitate emergency vehicle access the measures that would be implemented to ensure that the proposed development is consistent with the aims, objectives and guidelines in the NSW Fire and Rescue guideline Fire Safety in Waste Facilities dated 27 February 2020	Section 6.5 Fire safety assessment (Appendix I)
Air Quality	a description of all potential sources of air and odour emissions an air quality impact assessment in accordance with relevant Environment Protection Authority guidelines a description and appraisal of air quality impact mitigation and monitoring measures.	Section 6.3 Air quality and greenhouse gas assessment (Appendix H)
Noise and Vibration	a description of all potential noise and vibration sources during operation, including road traffic noise a noise and vibration assessment in accordance with the relevant Environment Protection Authority guidelines a description and appraisal of noise and vibration mitigation and monitoring measures.	Section 6.2 Noise and vibration impact assessment (Appendix G)
Traffic and transport	details of road transport routes and access to the site road traffic predictions for the development during operation swept path diagrams depicting vehicles entering, exiting and manoeuvring throughout the site an assessment of impacts to the safety and function of the road network and the details of any road upgrades required for the development.	Section 6.1 Traffic impact assessment (Appendix F)
Visual	an impact assessment at private receptors and public vantage points.	N/A – No physical works proposed
Heritage	including Aboriginal and non-Aboriginal cultural heritage.	N/A – Section 4.1.5
The EIS must assess the proposal against the relevant environmental planning instruments, including but not limited to:	State Environmental Planning Policy (Infrastructure) 2007 State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017 State Environmental Planning Policy No. 19 – Bushland in Urban Areas State Environmental Planning Policy No. 33 – Hazardous and Offensive Development Sutherland Local Environmental Plan 2015 relevant development control plans and section 7.11plans.	Chapter 4 Statutory Context

12 June 2020

Mr Stuart Wilmot
Principal
Urban Perspectives
GPO Box 4507
SYDNEY NSW 2001

File Number: EF20/22317
SEAR 1463

Dear Mr Wilmot,

Waste Management Facilities or Works
43 Bay Road, Taren Point (Lot 123 DP815747)
Planning Secretary's Environmental Assessment Requirements (SEAR) 1463

Thank you for your request for the Planning Secretary's Environmental Assessment Requirements (SEARs) for the preparation of an Environmental Impact Statement (EIS) for the above development proposal. I have attached a copy of these requirements.

In support of your application, you indicated that your proposal is designated development under Part 4 of the *Environmental Planning and Assessment Act 1979.* In preparing the SEARs, the Department of Planning, Industry and Environment (the Department) has consulted with the Environment Protection Authority. Unfortunately, the Environment Protection Authority was unable to respond in time. You must undertake direct consultation with them and address their requirements in the EIS.

The Department has also consulted with the Transport for NSW as required by Schedule 3 of State Environmental Planning Policy (Infrastructure) 2007. A copy of their requirements is attached.

If any integrated approvals are identified before the Development Application (DA) is lodged, you must undertake direct consultation with the relevant agencies, and address their requirements in the EIS.

If your proposal contains any actions that could have a significant impact on matters of National Environmental Significance, then it will require an additional approval under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). This approval is in addition to any approvals required under NSW legislation. If you have any questions about the application of the EPBC Act to your proposal, you should contact the Commonwealth Department of Agriculture, Water and the Environment on (02) 6274 1111.

Should you have any further enquiries, please contact Mary Ellen Trimble, Planning and Assessment, at the Department on (02) 9274 6213 or via maryellen.trimble@planning.nsw.gov.au.

Yours sincerely

Chris Ritchie
Director
Industry Assessments
as delegate of the Planning Secretary

Planning Secretary's Environmental Assessment Requirements

Section 4.12(8) of the *Environmental Planning and Assessment Act 1979*. Schedule 3 of the Environmental Planning and Assessment Regulation 2000.

Designated Development

SEAR Number	1463
Proposal	To increase the processing limit of the recycling and transfer facility up to 60,000 tonnes per annum.
Location	43 Bay Road, Taren Point (Lot 123 DP815747) in the Sutherland local government area.
Applicant	Visy Industries Australia Pty Ltd
Date of Issue	2 June 2020
General Requirements	The Environmental Impact Statement (EIS) must meet the minimum form and content requirements in clauses 6 and 7 of Schedule 2 of the Environmental Planning and Assessment Regulation 2000.
Key Issues	The EIS must include an assessment of all potential impacts of the proposed development on the existing environment (including cumulative impacts if necessary) and develop appropriate measures to avoid, minimise, mitigate and/or manage these potential impacts. As part of the EIS assessment, the following matters must also be addressed: • **strategic and statutory context** – including: - a detailed justification for the proposal and suitability of the site for the development - a demonstration that the proposal is consistent with all relevant planning strategies, environmental planning instruments, development control plans (DCPs), or justification for any inconsistencies – a list of any approvals that must be obtained under any other Act or law before the development may lawfully be carried out. – a description of how the proposed expansion integrates with existing on-site operations – a description of any amendments to and/ or additional licence(s) or approval(s) required to carry out the proposed development. • **suitability of the site** – including: - a detailed justification that the site can accommodate the proposed processing capacity, having regard to the scope of the operations and its environmental impacts and relevant mitigation measures - floor plans depicting the proposed facility layout, including the location of machinery, equipment and waste stockpile locations. • **waste management** – including: - details of the type, quantity and classification of waste to be received at the site - details of the resource outputs and any additional processes for residual waste - details of waste handling including, transport, identification, receipt, stockpiling and quality control – the measures that would be implemented to ensure that the proposed development is consistent with the aims, objectives and guidelines in the *NSW Waste Avoidance and Resource Recovery Strategy 2014-21*.

	• **hazards and risk** – including: - a preliminary risk screening completed in accordance with State Environmental Planning Policy No. 33 – Hazardous and Offensive Development and Applying SEPP 33 (DoP, 2011), with a clear indication of class, quantity and location of all dangerous goods and hazardous materials associated with the development. Should preliminary screening indicate that the project is "potentially hazardous" a Preliminary Hazard Analysis (PHA) must be prepared in accordance with Hazardous Industry Planning Advisory Paper No. 6 - Guidelines for Hazard Analysis (DoP, 2011) and Multi-Level Risk Assessment (DoP, 2011). • **fire and incident management** – including: - technical information on the environmental protection equipment to be installed on the premises such as air, water and noise controls, spill clean-up equipment, fire management (including the location of fire hydrants and water flow rates at the hydrants) and containment measures - details of the size and volume of stockpiles and their arrangements to minimise fire spread and facilitate emergency vehicle access - the measures that would be implemented to ensure that the proposed development is consistent with the aims, objectives and guidelines in the NSW Fire and Rescue guideline *Fire Safety in Waste Facilities dated 27 February 2020*. • **air quality** – including: - a description of all potential sources of air and odour emissions - an air quality impact assessment in accordance with relevant Environment Protection Authority guidelines - a description and appraisal of air quality impact mitigation and monitoring measures. • **noise and vibration** – including: - a description of all potential noise and vibration sources during operation, including road traffic noise - a noise and vibration assessment in accordance with the relevant Environment Protection Authority guidelines - a description and appraisal of noise and vibration mitigation and monitoring measures. • **traffic and transport** – including: - details of road transport routes and access to the site - road traffic predictions for the development during operation - swept path diagrams depicting vehicles entering, exiting and manoeuvring throughout the site - an assessment of impacts to the safety and function of the road network and the details of any road upgrades required for the development. • **visual** – including an impact assessment at private receptors and public vantage points. • **heritage** – including Aboriginal and non-Aboriginal cultural heritage.
Environmental Planning Instruments and other policies	The EIS must assess the proposal against the relevant environmental planning instruments, including but not limited to: • State Environmental Planning Policy (Infrastructure) 2007 • State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017 • State Environmental Planning Policy No. 19 – Bushland in Urban Areas • State Environmental Planning Policy No. 33 – Hazardous and Offensive Development • Sutherland Local Environmental Plan 2015 • relevant development control plans and section 7.11 plans.
Guidelines	During the preparation of the EIS you should consult the Department's Register of Development Assessment Guidelines which is available on the Department's website at https://www.planning.nsw.gov.au/Assess-and-Regulate/Development-Assessment/Industries. Whilst not exhaustive, this Register contains some of the guidelines, policies, and plans that must be taken into account in the environmental

	assessment of the proposed development.
Consultation	During the preparation of the EIS, you must consult the relevant local, State and Commonwealth government authorities, service providers and community groups, and address any issues they may raise in the EIS. In particular, you should consult with the: • Department of Planning, Industry and Environment, specifically the: o Environment Protection Authority • Transport for NSW • Fire & Rescue NSW • La Perouse Local Aboriginal Land Council • Sutherland Shire Council • the surrounding landowners and occupiers that are likely to be impacted by the proposal. Details of the consultation carried out and issues raised must be included in the EIS.
Further consultation after 2 years	If you do not lodge an application under Section 4.12(8) of the *Environmental Planning and Assessment Act 1979* within 2 years of the issue date of these SEARs, you must consult with the Planning Secretary in relation to any further requirements for lodgement.

Our Reference: SYD20/00526/01
DPIE Reference: SEAR 1463

22 May 2020

The Director, Industry Assessments
Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Attention: Mary Ellen Trimble

Dear Sir/Madam,

SEARS REQUEST FOR INPUT
VISY RESOURCE MANAGEMENT FACILITY
43 BAY ROAD, TAREN POINT

Reference is made to the Department of Planning, Industry, and Environment (DPIE) correspondence via email Portal dated 8 May 2020, regarding the abovementioned application which was referred to Transport for NSW (TfNSW) for comment.

TfNSW has reviewed the submitted information and request the following issues to be addressed as part of the traffic and transport impact assessment of the proposed development:

1. Daily and peak traffic movements likely to be generated by the proposed redevelopment (including vehicle type and the likely arrival and departure times) and volumes likely to be generated during construction and operation, including a description of haul route origins and destinations, including;

    a. An inbound and outbound vehicle profile by time of day and day of week (if travel patterns differ across the week);
    b. Site plan and operating plan to demonstrate that the site will be managed such that queues do not develop on Bay Road;
    c. Site plan showing the proposed layout of the processing plant, storage and handling facilities and truck circulation layout that demonstrates the site will accommodate the most productive vehicle types (noting that the surrounding road network accommodates 25/26 metre B-doubles);
    d. Site layout that illustrates how loading and unloading (including waiting areas) will occur in relation to covered and uncovered areas for the different material types;
    e. Map the catchment for this processing centre to demonstrate that it is located in a suitable location to serve the construction industry from the perspective of not generating additional trips over long distances between construction sites, batching plants, this facility and land fill locations;
    f. Details of the driver facilities provided on site;
    g. Details of the origin/destination of dangerous goods movements to/from the site; and
    h. Swept path diagrams depicting vehicles entering, exiting and manoeuvring throughout the site for both light and heavy vehicles.

2. The impact of trips generated by the development on nearby intersections, with consideration of the cumulative impacts from other approved developments in the vicinity, and the need/associated funding for, and details of, upgrades or road improvement works, if required (Traffic modelling is to be undertaken using SIDRA network modelling for current and future years). The key intersections to be examined/modelled include:

    - Taren Point Road / Bay Road

- Bay Road / Alexander Road
- Bay Road / Production Road
- Bay Road / Atkinson Road

3. Details of the proposed accesses and the parking provisions associated with the proposed redevelopment including compliance with the requirements of the relevant Australian Standards (ie: turn paths, sight distance requirements, aisle widths, etc).

4. Proposed number of car parking spaces and compliance with the appropriate parking codes.

5. To ensure that the above requirements are fully addressed, the traffic impact assessment must properly ascertain the cumulative study area traffic impacts associated with the redevelopment (and any other known proposed developments in the area). This process provides an opportunity to identify a package of traffic and transport infrastructure measures required to support future development. Regional and local intersection and road improvements, vehicular access options for adjoining sites, public transport needs, the timing and cost of infrastructure works and the identification of funding responsibilities associated with the development should be identified.

6. TfNSW requires the Environmental Assessment report to address the implications of the proposed development for non-car travel modes (including public transport use, walking and cycling); the potential for implementing a location-specific sustainable travel plan (eg 'Travelsmart' or other travel behaviour change initiative); and the provision of facilities to increase the non-car mode share for travel to and from the site. This will entail an assessment of the accessibility of the development site by public transport.

7. The detailed traffic impact assessment should address the relevant planning provisions, goals and strategic planning objectives in the following:
    - Future Transport 2056 and supporting documents;
    - Draft NSW Freight and Ports Plans;
    - Guide to Traffic Generating Developments 2002(RTA);
    - TDT 2013/04a Guide to Traffic Generating Developments, and;
    - Austroads Guide to Traffic Management Part 12: Traffic Impacts of Development.

If you have any further inquiries in relation to this development application please contact Narelle Gonzales, Development Assessment Officer, on 0409 541 879 or by email at: development.sydney@rms.nsw.gov.au.

Yours sincerely,

Brendan Pegg
Senior Land Use Planner
Planning and Programs, Greater Sydney

REPORT

VISY RESOURCE MANAGEMENT FACILITY

43 BAY ROAD, TAREN POINT, NSW

AIR QUALITY IMPACT ASSESSMENT
RWDI # 2190011
1 December 2022

SUBMITTED TO

Visy Industries Pty Ltd
Level 11, 2 Southbank Boulevard
Southbank VIC 3006

c/- John Arnold
Town Planning Consultant
Urban Perspectives
john@urbanperspectives.com.au

SUBMITTED BY

Davis Lai
Project Manager
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DOCUMENT CONTROL

Version	Status	Date	Prepared By	Reviewed By
A	Draft	27 April 2021	Nic Hall	John Wassermann
B	Final	20 September 2021	John Wassermann	--
C	Final	25 October 2021	John Wassermann	--
D	Final	28 April 2022	John Wassermann	--
E	Final	1 December 2022	John Wassermann	--

NOTE

All materials specified by RWDI Australia Pty Ltd (RWDI) have been selected solely on the basis of acoustic performance. Any other properties of these materials, such as fire rating, chemical properties etc. should be checked with the suppliers or other specialised bodies for fitness for a given purpose.

The information contained in this document produced by RWDI is solely for the use of the client identified on the front page of this report. Our client becomes the owner of this document upon full payment of our **Tax Invoice** for its provision. This document must not be used for any purposes other than those of the document's owner. RWDI undertakes no duty to or accepts any responsibility to any third party who may rely upon this document.

WILKINSON MURRAY

In October 2020, Wilkinson Murray Pty Ltd merged with RWDI Group, a leading international consulting firm. Wilkinson Murrays core practice areas of noise, acoustics, vibration and air quality consulting built since 1962 servicing Australia and Asia-Pacific region will complement RWDI practice areas. Combined, RWDI+Wilkinson Murray is one of the largest teams globally specialising in the area of noise, acoustics, vibration and air quality.

RWDI

RWDI is a team of highly specialised consulting engineers and scientists working to improve the built environment through three core areas of practice: building performance, climate engineering and environmental engineering. More information is available at www.rwdi.com.

AAAC

This firm is a member firm of the Association of Australasian Acoustical Consultants and the work here reported has been carried out in accordance with the terms of that membership.

QUALITY ASSURANCE

RWDI Australia Pty Ltd operates a Quality Management System which complies with the requirements of AS/NZS ISO 9001:2015. This management system has been externally certified by SAI Global and Licence No. QEC 13457 has been issued for the following scope: The provision of consultancy services in acoustic engineering and air quality; and the sale, service, support and installation of acoustic monitoring and related systems and technologies.

GLOSSARY OF AIR QUALITY TERMS

Air Pollution – The presence of contaminants or pollutant substances in the air that interfere with human health or welfare or produce other harmful environmental effects.

Air Quality Standards – The level of pollutants prescribed by regulations that are not to be exceeded during a given time in a defined area.

Air Toxics – Any air pollutant for which a national ambient air quality standard (NAAQS) does not exist (i.e. excluding ozone, carbon monoxide, PM-10, sulphur dioxide, nitrogen oxide) that may reasonably be anticipated to cause cancer; respiratory, cardiovascular, or developmental effects; reproductive dysfunctions, neurological disorders, heritable gene mutations, or other serious or irreversible chronic or acute health effects in humans.

Airborne Particulates – Total suspended particulate matter found in the atmosphere as solid particles or liquid droplets. Chemical composition of particulates varies widely, depending on location and time of year. Sources of airborne particulates include dust, emissions from industrial processes, combustion products from the burning of wood and coal, combustion products associated with motor vehicle or non-road engine exhausts, and reactions to gases in the atmosphere.

Area Source – Any source of air pollution that is released over a relatively small area, but which cannot be classified as a point source. Such sources may include vehicles and other small engines, small businesses and household activities, or biogenic sources, such as a forest that releases hydrocarbons, may be referred to as nonpoint source.

Concentration – The relative amount of a substance mixed with another substance. Examples are 5 ppm of carbon monoxide in air and 1 mg/l of iron in water.

Emission – Release of pollutants into the air from a source. We say sources emit pollutants.

Emission Factor – The relationship between the amount of pollution produced and the amount of raw material processed. For example, an emission factor for a blast furnace making iron would be the number of pounds of particulates per ton of raw materials.

Emission Inventory – A listing, by source, of the amount of air pollutants discharged into the atmosphere of a community; used to establish emission standards.

Flow Rate – The rate, expressed in gallons -or litres-per-hour, at which a fluid escapes from a hole or fissure in a tank. Such measurements are also made of liquid waste, effluent, and surface water movement.

Fugitive Emissions – Emissions not caught by a capture system.

Hydrocarbons (HC) – Chemical compounds that consist entirely of carbon and hydrogen.

Hydrogen Sulphide (H_2S) – Gas emitted during organic decomposition. Also, a by-product of oil refining and burning. Smells like rotten eggs and, in heavy concentration, can kill or cause illness.

Inhalable Particles – All dust capable of entering the human respiratory tract.

Nitric Oxide (NO) – A gas formed by combustion under high temperature and high pressure in an internal combustion engine. NO is converted by sunlight and photochemical processes in ambient air to nitrogen oxide. NO is a precursor of ground-level ozone pollution, or smog.

Nitrogen Dioxide (NO_2) – The result of nitric oxide combining with oxygen in the atmosphere; major component of photochemical smog.

Nitrogen Oxides (NO_x) – A criteria air polluant. Nitrogen oxides are produced from burning fuels, including gasoline and coal. Nitrogen oxides are smog formers, which react with volatile organic compounds to form smog. Nitrogen oxides are also major components of acid rain.

Mobile Sources – Moving objects that release pollution; mobile sources include cars, trucks, buses, planes, trains, motorcycles and gasoline-powered lawn mowers.

Particulates; Particulate Matter (PM-10) – A criteria air pollutant. Particulate matter includes dust, soot and other tiny bits of solid materials that are released into and move around in the air. Particulates are produced by many sources, including burning of diesel fuels by trucks and buses, incineration of garbage, mixing and application of fertilizers and pesticides, road construction, industrial processes such as steel making, mining operations, agricultural burning (field and slash burning), and operation of fireplaces and woodstoves. Particulate pollution can cause eye, nose and throat irritation and other health problems.

Parts Per Billion (ppb)/Parts Per Million (ppm) – Units commonly used to express contamination ratios, as in establishing the maximum permissible amount of a contaminant in water, land, or air.

PM_{10}/$PM_{2.5}$ – PM_{10} is measure of particles in the atmosphere with a diameter of less than 10 or equal to a nominal 10 micrometres. $PM_{2.5}$ is a measure of smaller particles in the air.

Point Source – A stationary location or fixed facility from which pollutants are discharged; any single identifiable source of pollution; e.g. a pipe, ditch, ship, ore pit, factory smokestack.

Scrubber – An air pollution device that uses a spray of water or reactant or a dry process to trap pollutants in emissions.

Source – Any place or object from which pollutants are released.

Stack – A chimney, smokestack, or vertical pipe that discharges used air.

Stationary Source – A place or object from which pollutants are released and which does not move around. Stationary sources include power plants, gas stations, incinerators, houses etc.

Temperature Inversion – One of the weather conditions that are often associated with serious smog episodes in some portions of the country. In a temperature inversion, air does not rise because it is trapped near the ground by a layer of warmer air above it. Pollutants, especially smog and smog-forming chemicals, including volatile organic compounds, are trapped close to the ground. As people continue driving and sources other than motor vehicles continue to release smog-forming pollutants into the air, the smog level keeps getting worse.

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GLOSSARY OF AIR QUALITY TERMS

LIST OF APPENDICES

1 INTRODUCTION

1.1 Background

RWDI Australia Pty Ltd (incorporating Wilkinson Murray Pty Limited) has been engaged by Visy to provide an air quality impact assessment to accompany a development application for the existing Resource Management Facility (the facility) in Taren Point. Visy operates a recyclable material transfer facility (TRF) and materials recyclable facility (MRF) at 43 Bay Road, Taren Point (the site). The maximum annual throughput of the facility is 30,000 tonnes. Visy is seeking development consent to operate the facility with a maximum annual throughput of 60,000 tonnes (the Proposal).

The facility may operate fully as a TRF, fully as an MRF, or partly as a TRF and MRF. It will employ approximately 31 people on Monday to Friday, including up to 3 shifts per day. Refer to **Table 1-3**.

The primary objective of this study is to assess the potential air quality impacts associated with the Proposal by addressing the Secretary's Environmental Assessment Requirements (SEARs) 1463 issued on 12 June 2020. **Table 1-1** presents the outline of the SEARs and the sections addressing the SEARs.

Table 1-1 - SEARs

SEARs	Where Addressed
A description of all potential sources of air and odour emissions	Section 5
An air quality impact assessment in accordance with relevant Environment Protection Authority guidelines	Section 6
A description and appraisal of air quality impact mitigation and monitoring measures	Section 6.3

In a letter of acknowledgement from the Sutherland Shire Council regarding the SEARs (file reference: DN20/0019, dated 18 Sep 2020), the Council also requires the air quality items in **Table 1-2** to be addressed.

Table 1-2 - Sutherland Shire Council Requirements

Council Requirements	Where Addressed
Any future development application proposing any intensification of the existing use should include an air quality report prepared by a suitably qualified and experienced air quality consultant that identifies all potential point and fugitive sources of air pollutants and odours from the development. This report needs to include:	
i. **Sources of pollutants and odours generated during operation;**	Section 2.3, 5 and 6
ii. **Information on handling procedures, transport and storage of materials;**	Section 2.3, 5 and 6
iii. **Details on how the facility is planning to manage air quality at the premises including odour, e.g. will odour suppressants or masking agents via sprinkler systems or an alternate system be used; and**	Section 6.3
iv. **Details of how onsite dust suppression during delivery and processing will be managed.**	Section 6.3
The consultant should assess the potential risk to the health and well-being of workers on site and the surrounding community from exposure to the air pollutants generated from both the sources on site and in combination with the average ambient air quality level.	Potential impacts on the health and well-being of workers from exposure to air pollutants at the site would be managed by Visy's workplace health and safety (WHS) procedures, as required under applicable state and federal legislation, and are not considered further in this report.
The analysis needs to include air quality modelling undertaken in accordance with the EPA Approved Methods for the Modelling and Assessment of Air Pollutants in NSW, Assessment and Management of Odour from Stationary Sources in NSW and Technical Notes: Assessment and Management of Odour from Stationary Sources in NSW. Inputs must include factors such as surrounding building heights, terrain etc.	The items raised by Sutherland Shire Council have been addressed throughout this report. Section 2.3, 4, 5 and 6

Council Requirements	Where addressed
All pollutants in the report must be presented in the same unit measure as the air quality standard, e.g. NEPM to compare predicted levels more easily with the standard. The measurement of PM2.5 and PM10 must also include 2025 NEPM amendment levels.	The NSW EPA document Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales (NSW EPA, 2017) present the appropriate air quality impact assessment criteria for this project. The National Environment Protection Council (NEPC) Act 1994 and subsequent amendments define the National Environment Protection Measures (NEPMs) as instruments for setting environmental objectives in Australia for state governments. The NSW EPA has considered the NEPM objectives to develop its air quality impact assessment criteria. Refer to Sections 2.4 and 2.5.
In addition to the above, any future development application that proposes an increase in the intensity of the operation should include an outline of an Air Quality Management Plan for the site and potential mitigation strategies to address pollutant and odour sources.	Refer to Section 6.3

1.2 Site Operation

The site includes:

- A calibrated weighbridge
- A waste receival bay
- MRF Plant
- Powered Mobile Plant

Compactor trucks from Council and Commercial businesses enter the site from the South via Bay Road and cross the weighbridge. The site has capacity for queuing and staging of trucks if required. The trucks unload recyclable material in the receival bay inside the warehouse then exit through the western roller door onto Alexander Avenue.

A front-end loader (FEL) shifts material within the receival bay where site personnel visually inspect the received recyclable material and remove any hazardous contaminants.

If the site is operating as a TRF, the material is then loaded into bulk haul trucks using the FEL.

If the site is operating as a MRF, then the FEL will load recyclable material onto the feed conveyor for the MRF plant. The MRF comprises mechanical equipment, interconnecting conveyors and hoppers. Sorted material exits the MRF in various forms; Glass and non-recyclables are loose, Mixed Plastics, Steel, Aluminium and Paper/Cardboard are baled.

The relevant information to the Proposal is presented in **Table 1-2**.

Figure 1-1 presents the layout of the Visy Resource Recovery Facility.

Table 1-3 - Proposal information

Weekday	Shift	MRF Operation Times	TRF Operation Times
Monday to Friday	Operational Shift 1	4am-5am (Cleaning) 5am-11am (MRF) 11am-12pm (Cleaning & Maintenance) 14 Staff	4am-12pm (Receiving & Loading Out) 1-2 Staff
	Operational Shift 2	12pm-1pm (Cleaning & Maintenance) 1pm-8pm (MRF) 14 Staff	12pm-8pm (Receiving & Loading Out) 1-2 Staff
	Operational Shift 3	9pm-4am (MRF) 14 Staff	N/A
	Office	6am-5pm 1-3 Staff	6am-5pm 1-3 Staff
Saturday to Sunday	Operational Shift	6am-2pm (MRF) 2pm-4pm (Cleaning) 14 Staff	6am-2pm (Loading Out Material) 1-2 Staff
	Maintenance Shift	6am-4pm (Maintenance & Loading Out Material) 3 Staff	N/A

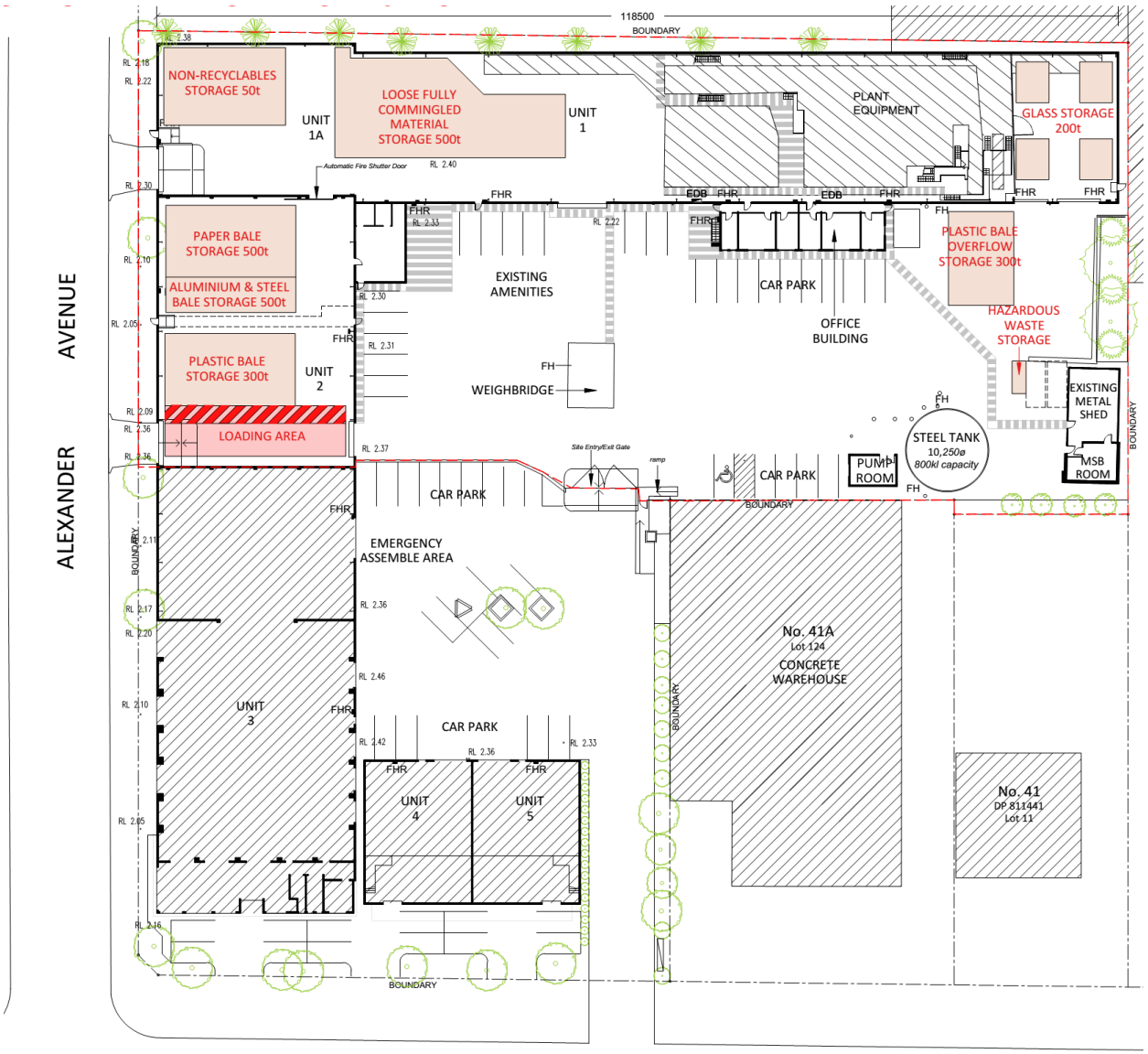

Figure 1-1 - Visy Resource Recovery Facility - Site Layout

2 AIR QUALITY CRITERIA

2.1 Introduction

The NSW EPA's Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales (the Approved Methods) sets out applicable impact assessment criteria for a number of air pollutants.

Air quality criteria are benchmarks set to protect the general health and amenity of the community in relation to air quality. The sections below identify the pollutants of interest in this study and the application of air quality criteria for each pollutant.

2.2 Pollutants of Interest

The primary sources of air pollutants associated with the Project are the exhaust emissions from trucks and mobile plant operating within the building. Trucks and mobile plant operating within the building would run on diesel fuel. Air pollutants associated with diesel exhaust comprise:

- Particulate matter;
- Nitrogen dioxide;
- Carbon monoxide; and
- Sulfur dioxide.

2.3 Odour

The incoming material to the facility is generally clean and not odorous. In the rare event that incoming material is identified as being contaminated by odorous waste, the contaminated material would be removed from site as soon as practicable. Furthermore, the client advises that odour complaints have not been received during existing operations. Therefore, odour impacts are considered unlikely and have not been considered further in this assessment.

2.4 Impact Assessment Criteria

Dust and particulate matter, nitrogen dioxide, carbon monoxide and sulfur dioxide are among a group of air pollutants referred to as "criteria pollutants" in the Approved Methods. The impact assessment criteria for criteria pollutants relevant to the Proposal are presented in Table 2-1.

The criteria in relate to the total concentrations of pollutants in the air and not just that from the Proposal. Therefore, some consideration of background levels needs to be made when assessing the air quality impacts from the Proposal.

Table 2-1 - Impact Assessment Criteria - Pollutants

Pollutant	Averaging Period	Impact	Criteria
Particulate matter ≤10 µm (PM_{10})	Annual	Total	25 µg/m³
	24 hours	Total	50 µg/m³

Particulate matter ≤2.5 µm ($PM_{2.5}$)	Annual	Total	8 µg/m³
	24 hours	Total	25 µg/m³
Nitrogen dioxide (NO_2)	1 hour	Total	246 µg/m³
	Annual	Total	62 µg/m³
Carbon Monoxide (CO)	15-minutes	Total	100 mg/m³
	1 hour	Total	30 mg/m³
	8 hours	Total	10 mg/m³
Sulfur dioxide	10 minutes	Total	712 µg/m³
	1 hour	Total	570 µg/m³
	24 hours	Total	228 µg/m³
	Annual	Total	60 µg/m³

For an air quality impact assessment of $PM_{2.5}$ and PM_{10} 24-hour average, consistent with the *Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales* there are two assessment methodologies available, namely:

- Level 1 assessment; and
- Level 2 assessment.

The methodology for each assessment is presented below:

Level 1 Assessments

- Obtain ambient monitoring data that includes at least one year of continuous measurements.
- Determine the maximum background concentration of the pollutant being assessed for each relevant averaging period.
- At the maximum exposed off-site receptor, add the maximum background concentration and the 100th percentile dispersion model prediction to obtain the total impact for each averaging period.

Level 2 Assessments

- Obtain ambient monitoring data that includes at least one year of continuous measurements and is contemporaneous with the meteorological data used in the dispersion modelling.
- At each receptor, determine the 100th percentile (maximum) total impact for the relevant averaging.
- At each receptor, add each individual dispersion model prediction to the corresponding measured background concentration to obtain predictions of total impact and calculate if any additional exceedance of the air quality assessment criteria would occur with the project.

It should be noted where ambient levels are above the criteria as stated in **Table 2-1**, the assessment criteria are that the proposal does not generally result in additional exceedances of the criteria when assessed contemporaneously (Level 2 Assessment).

2.5 National Environment Protection (Ambient Air Quality) Measure

The National Environment Protection Council (NEPC) Act 1994 and subsequent amendments define the National Environment Protection Measures (NEPMs) as instruments for setting environmental objectives in Australia for the key air pollutants; carbon monoxide, ozone, sulfur dioxide, nitrogen dioxide, lead and particles (PM_{10} and $PM_{2.5}$). The goals for the NEPM pollutants are outlined in **Table 2-2**. The Air NEPM requires the state governments to monitor air quality and to identify potential air quality problems using the goals as benchmarks. These NEPM goals are not impact assessment criteria.

Table 2-2 - NEPM Goals

Pollutant	Averaging Period	Maximum Concentration	Maximum Allowable Exceedances
Carbon monoxide	8 hours	9.0 ppm	1 day per year
Nitrogen dioxide	1 hour 1 year	0.12 ppm 0.03 ppm	1 day per year No exceedances
PM_{10}	1 day 1 year	50 µg/m^3 25 µg/m^3	No exceedances (see note)
$PM_{2.5}$	1 day 1 year	25 µg/m^3 8 µg/m^3	20 µg/m^3 (2025 goal) 7 µg/m^3 (2025 goal) No exceedances (see note)
Photochemical oxidants (as ozone)	1 hour 4 hours	0.10 ppm 0.08 ppm	1 day per year 1 day per year

3 EXISTING ENVIRONMENT

3.1 Sensitive Receptors

The land use immediately surrounding the Proposal site is industrial. The nearest and most potentially affected sensitive receptors are residents in nearby Anglicare aged care facilities (R1, R2 and R3) and private dwellings in Caringbah and Sylvania Waters. Discrete receptors have been identified for assessment purposes, as shown in **Figure 3-1** and identified in **Table 3-1**. Industrial land uses surrounding the site are not identified as sensitive receptors for the purposes of this assessment; however, the predicted air quality impacts at these locations have been presented by way of the contour plots in **Appendix A**.

Table 3-1 - Discrete Receptors

Receptor	Address	MGA56 Coordinates (m)	
		X	Y
R1	Woolooware Shores Retirement Village	326,847	6,234,107
R2	Goodhew Gardens Nursing Home	326,944	6,233,992
R3	25 Bay Road, Taren Point	327,082	6,233,831
R4	1 Crammond Boulevard, Caringbah	326,802	6,233,332
R5	28 Wollondilly Place, Sylvania Waters	326,847	6,234,107

Figure 3-1 - Sensitive Receptors

3.2 Local Meteorology

Meteorological conditions strongly influence air quality. Most significantly, wind speed, wind direction, temperature, relative humidity, and rainfall affect the dispersion of air pollutants, and are key inputs into dispersion models. The following sub-sections discuss the local meteorology near the site and identify a representative set of meteorological data for use in the dispersion modelling to be undertaken for this assessment.

Long-term meteorological data for the area surrounding the site is available from the Bureau of Meteorology (BoM) operated weather stations at Kurnell and Sydney Airport. The Kurnell BoM station is located approximately 8.5km north-east of the site and records observations of wind speed and direction. The Sydney Airport BoM station is located approximately 10km north of the site and records observations of a number of meteorological data including wind speed, wind direction, temperature, humidity, and rainfall. Since the Kurnell BoM station is located closer to the site than the Sydney Airport BoM station, wind speed and direction observations from the Kurnell BoM station are considered more representative of wind conditions near the site.

As recommended by the *Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales*, meteorological data from the Kurnell and Sydney Airport BoM stations have been reviewed over a period of at least five consecutive years (2015 to 2019).

3.2.1 Wind

Figure 3-2 to **Figure 3-7** present annual and seasonal "wind rose" plots for Kurnell BoM station for the period 2015 to 2019, inclusive. The plots show similar patterns of wind speed and wind direction over the five-year period, with strong north-easterly winds being prevalent in summer and spring, moderate to strong westerly and south westerly winds being prevalent in autumn and moderate to strong westerly and north westerly winds being prevalent in winter. Wind speed and wind direction during 2019 are generally representative of the 5-year period and have therefore been adopted for assessment purposes.

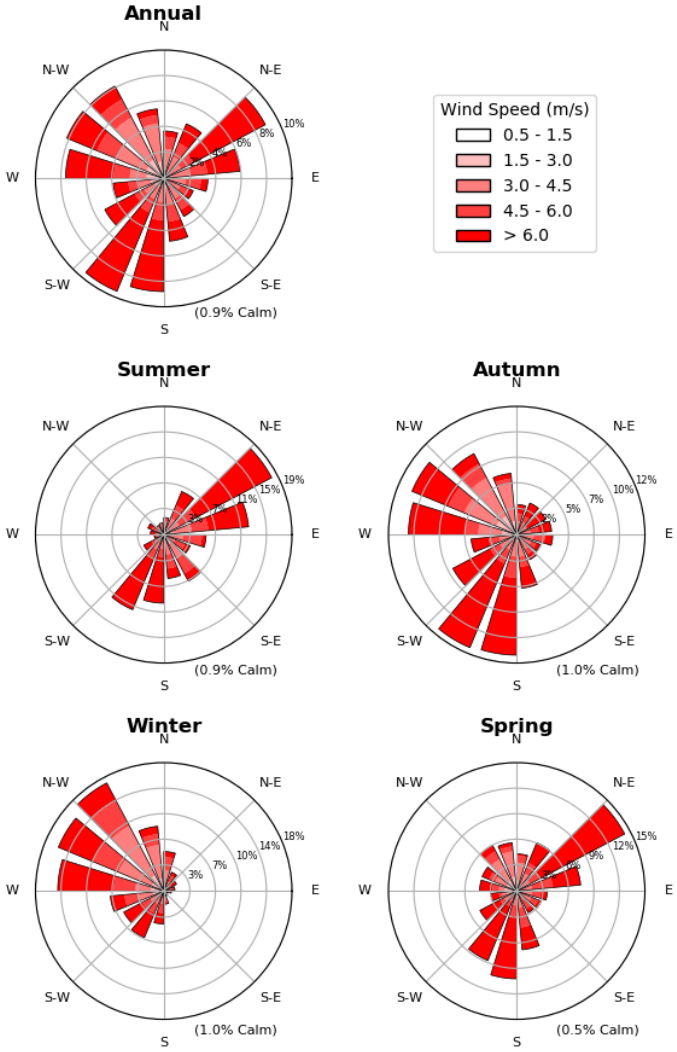

Figure 3-2 Kurnell BoM Station Wind Roses, 2015

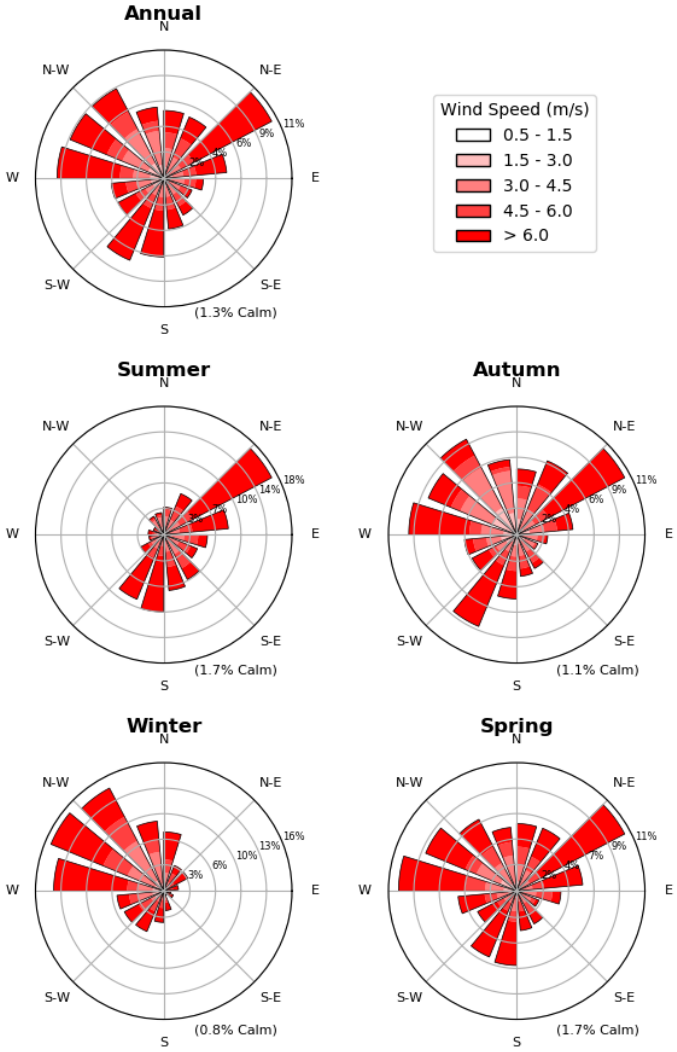

Figure 3-3 Kurnell BoM Station Wind Roses, 2016

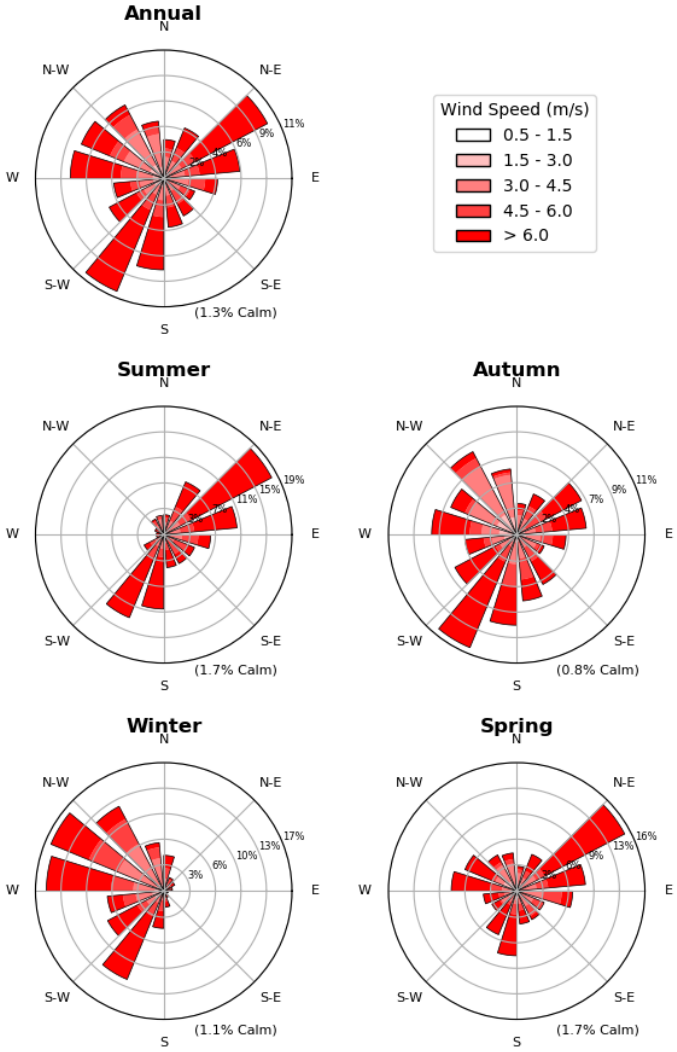

Figure 3-4 Kurnell BoM Station Wind Roses, 2017

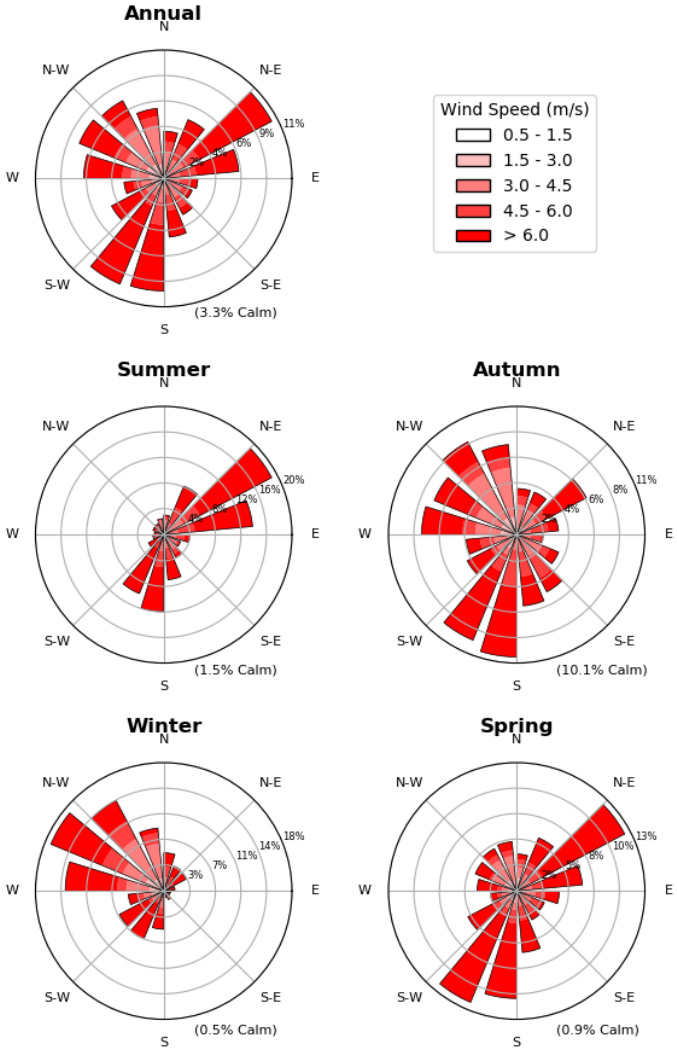

Figure 3-5 Kurnell BoM Station Wind Roses, 2018

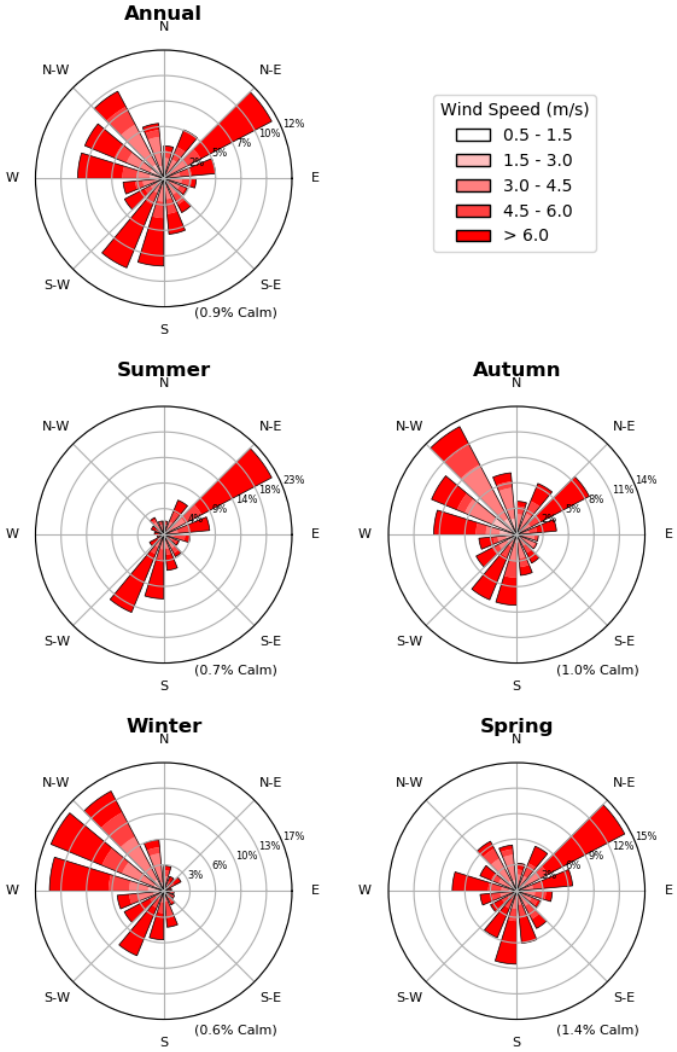

Figure 3-6 Kurnell BoM Station Wind Roses, 2019

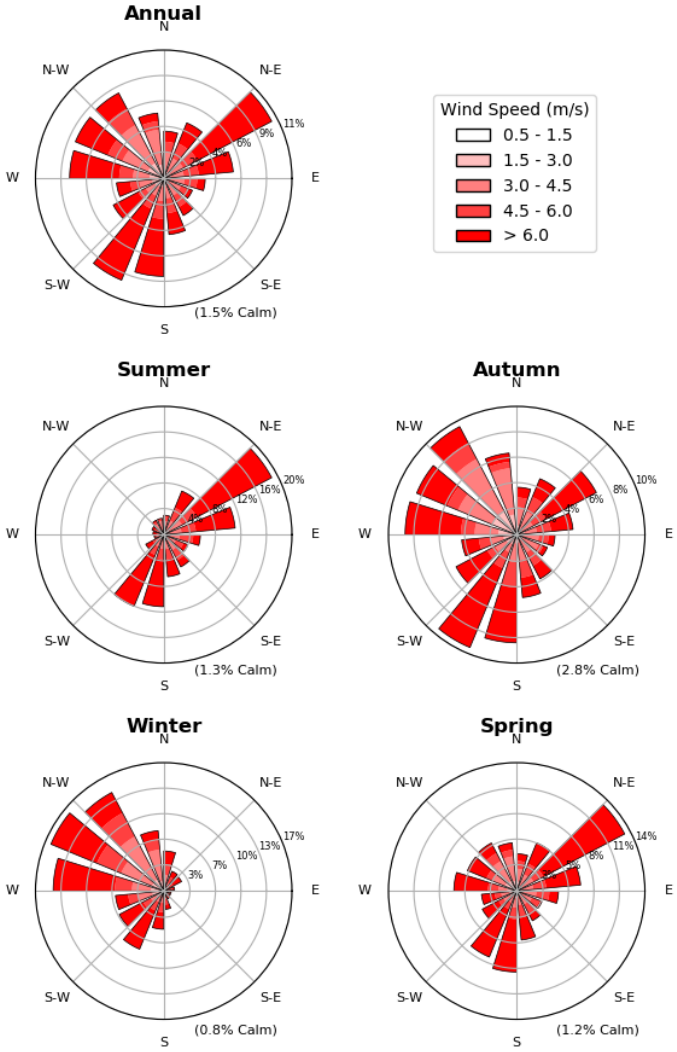

Figure 3-7 Kurnell BoM Station Wind Roses, 2015-2019

3.2.2 Temperature humidity and rainfall

Long-term climate statistics are presented in **Table 3-2**. Temperature data recorded at the Sydney Airport BoM station indicates that January is the hottest month of the year, with a mean daily maximum temperature of 26.7°C. July is the coolest month with a mean daily minimum temperature of 7.3°C. June is the wettest month with an average rainfall of 125 mm falling over 9 days. There are, on average, 96 rain days per year, delivering 1,077mm of rain.

Table 3-2 - Climate Averages for Sydney Airport BoM Station

Obs.	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year
9am Mean Observations													
Temp (°C)	22.4	22.3	21.1	18.2	14.6	11.9	10.8	12.5	15.7	18.4	19.9	21.6	17.4
Hum (%)	70	73	73	71	73	74	71	65	62	61	64	66	69
3pm Mean Observations													
Temp (°C)	24.8	24.8	23.9	21.7	19.0	16.6	16.1	17.2	19.0	20.7	22.1	23.9	20.8
Hum (%)	60	63	61	59	58	57	52	49	51	54	56	58	57
Daily Minimum & Maximum Temperatures													
Min (°C)	19.0	19.1	17.6	14.3	11.0	8.8	7.3	8.2	10.6	13.3	15.5	17.6	13.5
Max (°C)	26.7	26.5	25.4	23.0	20.2	17.7	17.2	18.4	20.7	22.7	24.2	25.9	22.4
Rainfall													
Rain (mm)	94.1	114.2	118.1	106.0	95.3	124.8	69.2	75.7	60.0	70.1	79.9	72.8	1077.4
Rain (days)	8.1	8.6	9.4	8.4	8.3	8.9	6.6	6.8	6.8	7.8	8.3	7.7	95.7

3.3 Local Ambient Air Quality

No site-specific data are available to determine the existing concentrations of air pollutants at sensitive receptors near the Proposal. The NSW Department of Planning, Industry and Environment (DPIE) operates a network of air quality monitoring stations (AQMS) across NSW. The nearest DPIE monitoring station is located approximately 12 kilometres north of the Proposal site, at Earlwood. The Earlwood AQMS does not record observations of carbon monoxide or sulfur dioxide. Accordingly, observations of ambient carbon monoxide and sulfur dioxide have been taken from the AQMS located at Rozelle and Randwick, respectively.

A summary of the relevant ambient air quality monitoring data collected at the Earlwood, Rozelle and Randwick AQMS site during the modelling year (2019) is presented in

Table 3-3.

Table 3-3 - Ambient Air Quality Monitoring Results, 2019

Pollutant	AQMS	Averaging Period	Concentration (µg/m³)
PM_{10}	Earlwood	Maximum 24-hours	129.4
		Annual Average	23.0
$PM_{2.5}$	Earlwood	Maximum 24-hours	86.2
		Annual Average	10.5
NO_2	Earlwood	1-hour	114.7
		Annual	19.3
CO	Rozelle	1-hour	5,980
		8-hours	2,530
SO_2	Randwick	1-hour	76.0
		24-hours	13.1
		Annual	2.6

Figure 3-8 and **Figure 3-9** show the 24-hour average PM_{10} and $PM_{2.5}$ data for the Earlwood site for 2019. It can be seen that concentrations are nominally highest in the spring and summer months with the warmer weather raising the potential for drier ground elevating the windblown dust, the occurrence of bushfires and pollen levels.

The data from **Table 3-3**, **Figure 3-8** and **Figure 3-9** show that ambient 24-hour average $PM_{2.5}$ and PM_{10} concentrations at the Earlwood AQMS exceeded the goals of 25 µg/m³ and 50 µg/m³ on a number of occasions. These exceedances of the goals were due to extreme events such as bushfires, dust storms and hazard reduction burns.

Since the background $PM_{2.5}$ and PM_{10} are already high for 24-hour average $PM_{2.5}$ and PM_{10}, a detailed Level 2 contemporaneous assessment has been conducted whereby the measured ambient concentrations at the Earlwood AQMS are added to the dispersion model results for each day of the simulation.

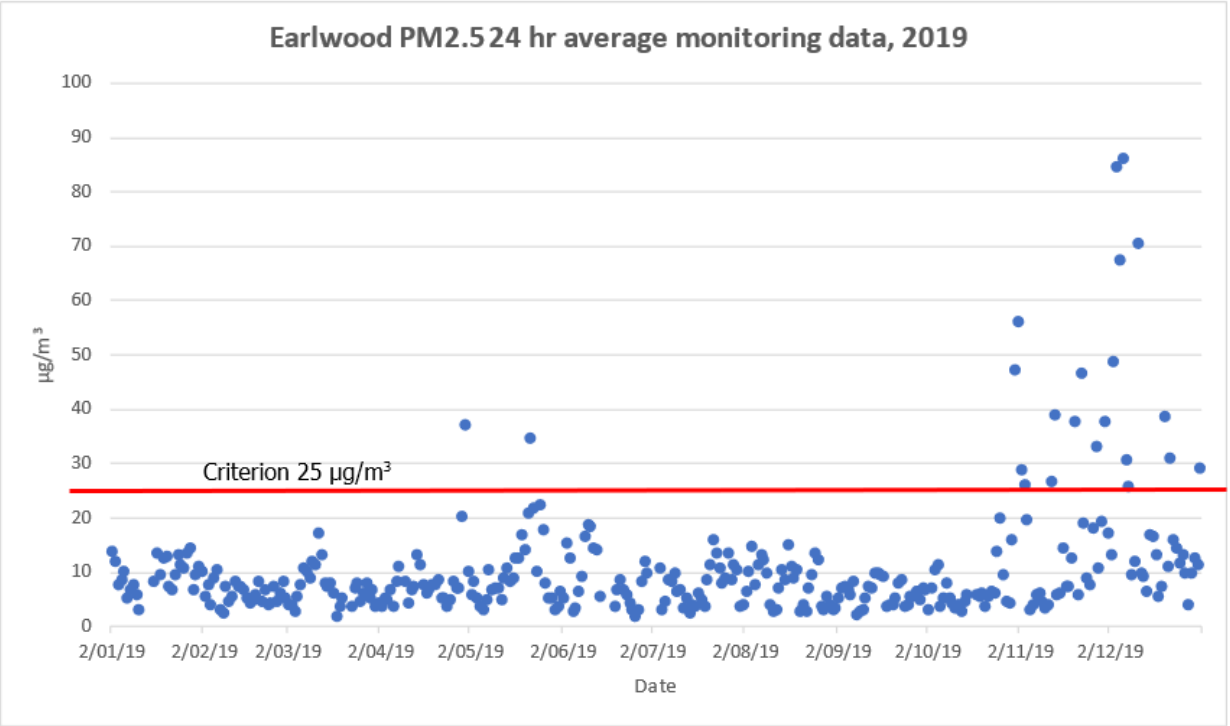

Figure 3-8 - Earlwood PM2.5 24-hour Average Monitoring Data, 2019

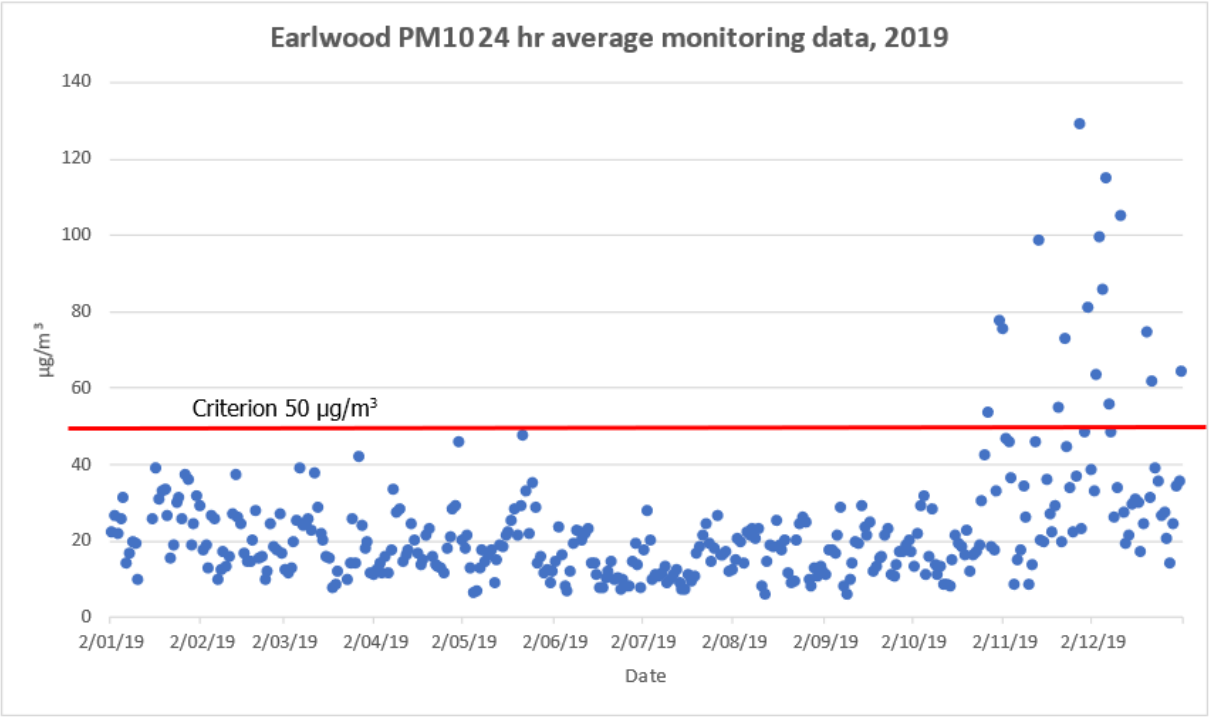

Figure 3-9 - Earlwood PM10 24-hour Average Monitoring Data, 2019

4 DISPERSION MODELLING

4.1 Meteorological Modelling

4.1.1 TAPM

No meteorological observation data is available for the site. Therefore, site-specific meteorological data was generated through the use of a prognostic model. The prognostic model used was The Air Pollution Model (TAPM), developed and distributed by the Commonwealth Scientific and industrial Research Organisation (CSIRO).

TAPM is an incompressible, non-hydrostatic, primitive equations prognostic model with a terrain-following vertical coordinate for three-dimensional simulations. It predicts the flows important to local scale air pollution, such as sea breezes and terrain induced flows, against a background of large-scale meteorology provided by synoptic analyses. TAPM benefits from having access to databases of terrain, vegetation and soil type, leaf area index, sea-surface temperature, and synoptic scale meteorological analyses for various regions around the world.

The prognostic modelling domain was centred at 34.03° S, 151.13° E and involved four nesting grids of 30km, 10km, 3km and 1km with 41 grids in the lateral dimensions and 25 vertical levels.

The TAPM model included assimilation of wind data collected at the Kurnell BoM Station during 2019.

4.1.2 AERMET

The TAPM results, including predictions of wind speed, wind direction, temperature, humidity, cloud cover, solar radiation, and rainfall, were used as inputs to AERMET – AERMOD's meteorological pre-processor. AERMET uses the TAPM data, along with land use data, to calculate mixing heights and velocity scaling parameters.

4.2 Dispersion Modelling

4.2.1 AERMOD

The dispersion model chosen for this assessment was AERMOD – the US EPA regulatory Gaussian plume air dispersion model. AERMOD is accepted by NSW EPA for use in air quality impact assessments.

AERMOD is a steady state plume model that incorporates air dispersion based on planetary boundary layer turbulence structure and scaling concepts. It includes treatment of both surface and elevated sources, and both simple and complex terrain.

4.2.2 NO_X transformation

In most combustion sources, high-temperature chemical processes cause the nitrogen in the fuel air mixture to oxidise, creating various 'oxides of nitrogen' or NO_X. Nitric oxide (NO) makes up the majority of NO_X emissions from engines, with NO_2 typically making up 5-10% of the NOX percentage.

When NO enters the plume, it reacts with atmospheric ozone (O_3) and is converted to NO_2. There is a number of accepted methods to model the transformation of NO_X to NO_2, ranging from very simple to rather complex.

This assessment makes use of the US EPA's Ozone Limiting Method (OLM) to predict ground level concentration of NO_2. The OLM assumes that all the available atmospheric O_3 will react with NO in the plume until either all of the O_3 or all the NO is used up.

Hourly background concentrations of O_3 and NO_2 are used to implement the OLM for each hour of the modelling run according to the following equation:

$$NO_{2,total} = 0.1 \times NO_{X,predicted} + MIN\left\{0.9 \times NO_{X,predicted}\ OR\ \left(\frac{46}{48}\right) \times O_{3,background}\right\} + NO_{2,background}$$

4.2.3 Sub 1-hour concentration

Dispersion models typically predict ground level concentrations at time intervals of one hour or more. To predict sub 1-hour pollutant concentrations, the following power-law, recommended by EPA Victoria (EPA Victoria, 1986), has been used:

$$C_{\tau_2} = C_{\tau_1}\left(\frac{\tau_1}{\tau_2}\right)^{0.2}$$

Where:

C_{τ_2} = concentration for averaging period 2

C_{τ_1} = concentration for averaging period 1

τ_1 = averaging period 1 (minutes)

τ_2 = averaging period 2 (minutes)

5 EMISSIONS TO AIR

The following section presents the estimated emissions of air pollutants associated with the operation of the Proposal.

5.1 Operational Air Emissions

During the operation of the Proposal, diesel exhaust emissions and haulage along paved roads would be the primary sources of air pollutants. Within the facility, several items of mobile plant would be operating in addition to trucks associated with the transfer of material to and from the site. Operating details for mobile plant and trucks are presented in **Table 5-1**.

Table 5-1 - Sources of Diesel Emissions

Source	Quantity	Details
Truck	Maximum of 74 per day Average of 61 per day Up to 10 in busiest hour	Up to 3 min on site, mostly idling fuel consumption 4.0 L/h
Loader	1	Model: JCB 436 Power = 129 kW Usage: 16 hours/day (very light usage only)
4t Forklift	2	Model: Linde H45D Power = 55 kW Usage: 16 hours/day

Any truck expecting to be stationary beyond a couple of minutes and/or mobile plant not undertaking operational activities would be instructed to turn off their engines. This should be incorporated in the site's operational management plan.

Pollutant emissions for the plant items in **Table 5-1** have been estimated from emission factors in the National Pollutant Inventory (NPI) *Emission estimate technique manual for combustion engines* (NPI, 2008) and are summarised in **Table 5-2**. These emission rates incorporate default "load factors" for mobile plant, except in the case of the loader, whose load factor has been reduced by 50% to reflect the very light usage of this plant item in moving light weight recyclable materials.

Particulate emissions from haulage within the site have been estimated using the "paved roads" emissions factors in Chapter 13.2.1 of the US EPA AP42 emissions factors.

Table 5-2 - Combustion Emission Rates – Per Item

Plant Item	Emission Rate (Per Item) (kg/hr)				
	PM_{10}	$PM_{2.5}$	NO_X	CO	SO_2
Truck	0.0083	0.0077	0.1364	0.0583	0.0001
Loader	0.0387	0.035475	0.48375	0.19995	0.000258
Forklift	0.0132	0.0121	0.1650	0.0682	0.0001

5.1.1 Worst-case hourly emissions

To assess air quality impacts against criteria with averaging periods of 1-hour, worst-case hourly emissions have been estimated on the basis that all mobile plant is operating continuously and that 10 trucks would access the site over the hour.

The estimated worst-case hourly emissions are summarised in **Table 5-3**.

Table 5-3 - Worst-case hourly emissions

Source	Emission Rate (g/s)				
	PM_{10}	$PM_{2.5}$	NO_X	CO	SO_2
Haulage	0.0085	0.0021	-	-	-
Combustion – Trucks	0.0012	0.0011	0.0189	0.0081	0.0000
Combustion – Loader	0.0108	0.0099	0.1344	0.0555	0.0001
Combustion – Forklift	0.0073	0.0067	0.0917	0.0379	0.0000
Total	**0.0277**	**0.0197**	**0.2450**	**0.1015**	**0.0001**

5.1.2 Typical worst-case daily emissions

To assess air quality impacts against 24-hour and annual average criteria, worst-case hourly emission rates for mobile plant have been scaled to account for the hours per day that the plant items are used. Additionally, paved road and exhaust emissions from trucks are calculated on the basis that a maximum 74 trucks access the site per day. The estimated daily emissions are summarised in **Table 5-4**.

Table 5-4 - Typical Daily Emissions

Source	Emission Rate (g/s)				
	PM_{10}	$PM_{2.5}$	NO_X	CO	SO_2
Haulage	0.0026	0.0006			
Combustion – Trucks	0.0004	0.0003	0.0058	0.0025	0.0000
Combustion – Loader	0.0054	0.0049	0.0672	0.0278	0.0000
Combustion – Forklift	0.0049	0.0045	0.0611	0.0253	0.0000
Total	**0.0132**	**0.0104**	**0.1341**	**0.0555**	**0.0001**

6 ASSESSMENT OF IMPACTS

This section presents the dispersion modelling results and discusses the likely off-site air quality impacts associated with the operation of the Proposal.

6.1 Particulate Matter (PM_{10} & $PM_{2.5}$)

The predicted ground level concentrations of PM_{10} and $PM_{2.5}$ associated with the operation of the proposal are presented in Table 6 1 and Table 6-2, respectively. Contour plots of incremental 24-hour average PM_{10} and $PM_{2.5}$ are presented in **Appendix A**.

The results show that:

- The operation of the Proposal is not predicted to result in any additional exceedances of 24-hour criteria compared to the existing ambient concentrations. The contemporaneous assessment (Level 2) for R2, where the highest increment was calculated, is presented in **Appendix B**.
- Annual average PM_{10} concentrations associated with the operation of the Proposal and the existing ambient concentrations comply with the impact assessment criterion.
- The incremental annual average $PM_{2.5}$ concentrations due to the operation of the Proposal are in the order of 1% of the existing ambient concentrations. This indicates that the Proposal would have a small contribution to ambient air quality at nearby receptors.

Table 6-1 - Predicted Ground Level Concentrations – PM_{10}

Receptor	24-hour Average				Annual Average		
	Maximum Increment	Maximum Background	Maximum Total	Additional exceedances due to Proposal	Incremental	Maximum Background	Maximum Total
R1	1.6	129.4	131.0	0	0.1	23.0	23.1
R2	1.9		131.3	0	0.2		23.2
R3	1.0		130.4	0	0.1		23.1
R4	1.1		130.5	0	0.1		23.1
R5	0.7		130.1	0	0.0		23.0
Criteria[1]	**-**		**50**	**0**	**-**		**25**

Note 1: Impact assessment criteria, is presented in Table 2-1.

Table 6-2 - Predicted Ground Level Concentrations – $PM_{2.5}$

Receptor	24-hour Average				Annual Average		
	Maximum Increment	Maximum Background	Maximum Total	Additional exceedances due to Proposal	Incremental	Maximum Background	Maximum Total
R1	1.2	86.2	87.4	0	0.1	10.5	10.6
R2	1.4		87.6	0	0.1		10.6
R3	0.7		86.9	0	0.1		10.6
R4	0.8		87.0	0	0.1		10.6
R5	0.5		86.8	0	0.0		10.5
Criteria[1]	-		**25**	**0**	-		**8**

Note 1: Impact assessment criteria, is presented in Table 2-1.

6.2 NO_2, SO_2 & CO

The predicted ground level concentrations of NO_2, SO_2 associated with the operation of the Proposal are presented in **Table 6-3**. The results demonstrate compliance with the impact assessment criteria at all receptors.

A contour plot of incremental 1-hour average NO_2 is presented in **Appendix A**.

6.3 Mitigation & Management

During the operation of the Proposal, all storage and processing of materials will occur within the building. Additionally, the haulage route will be sealed.

Dispersion modelling results indicate that the Proposal will have a minimal impact on local air quality, and that no additional mitigation is required.

Nevertheless, all reasonable and feasible measures to reduce air emissions would be included in the Operational Environmental Management Plan for the Proposal. Such measures may include:

- engines of vehicles and plant to be switched off when not it use;
- vehicles and plant to be fitted with pollution reduction devices where practicable;
- vehicles and plant to be maintained in accordance with manufacturer's specifications;
- trafficable areas to be swept/cleaned regularly;
- vehicles restricted to designated routes; and
- on-site speed limits enforced.

Table 6-3 - Predicted Ground Level Concentrations – NO_2, SO_2, CO

Receptor	NO_2				SO_2								CO					
	1-hour		Annual		10-minute		1-hour		24-hour		Annual		15-minute		1-hour		8-hour	
	Inc	Tot	Inc	Tot	Inc	Tot	Inc	Tot	Inc	Tot	Inc	Tot	Inc	Tot	Inc	Tot	Inc	Tot
R1	59.8	174.5	1.4	20.7	0.077	108.831	0.054	76.054	0.01	13.11	0.001	2.601	52	7,943	40	6,020	23	2,553
R2	61.6	176.3	1.5	20.8	0.095	108.849	0.067	76.067	0.02	13.12	0.002	2.602	64	7,955	49	6,029	30	30
R3	54.7	169.4	1.5	20.8	0.054	108.808	0.038	76.038	0.01	13.11	0.002	2.602	37	7,928	28	6,008	17	17
R4	56.3	171.0	0.8	20.1	0.126	108.880	0.088	76.088	0.01	13.11	0.001	2.601	85	7,975	64	6,044	22	22
R5	71.0	185.7	0.5	19.8	0.075	108.829	0.053	76.053	0.01	13.11	0.000	2.600	51	7,942	39	6,019	16	16
Criteria1	**-**	**246**	**-**	**62**	**-**	**712**	**-**	**570**	**-**	**228**	**-**	**60**	**-**	**100,000**	**-**	**30,000**	**-**	**10,000**

Note 1: Impact assessment criteria, see Table 2-1.

7 GREENHOUSE GAS ASSESSMENT

This section presents a greenhouse gas (GHG) assessment of the operation of the Proposal. This GHG assessment has been conducted in general accordance with:

- *National Greenhouse and Energy Reporting (Measurement) Technical Guidelines*; and
- *National Greenhouse Accounts Factors* (DoE, 2020).

The following greenhouse gases have been identified as significant contributors to global warming:

- Carbon dioxide (CO2);
- Methane (CH4);
- Nitrous oxide (N2O);
- Synthetic gases; and
- Hydro fluorocarbons HFCs, SF6, CF4, C2F6.

No significant emissions of HFCs and synthetic gases are likely to occur as a result of the operation of the Proposal and have therefore been omitted from the remainder of the assessment.

GHG emissions are categorized as Scope 1, Scope 2 and Scope 3 emissions, which are defined as follows:

- **Scope 1 – Direct (or point-source) emissions** – emissions from sources owned or operated by the facility.
- **Scope 2 – Indirect emissions** – emissions released as a result of the generation of electricity, or the production of heat, cooling or steam purchased by the facility.
- **Scope 3 – Various emissions** – all other GHG emissions that are not covered under Scope1 or Scope 2. Scope 3 emissions. These can include activities such as employees commuting to work; extraction, production and transport of fuels, materials and other goods; and use of products manufactured and sold.

This GHG assessment considers the following GHG emissions and energy consumption activities associated with the project:

Scope 1 – Direct Emissions:

- Combustion of fuel in facility owned stationary and mobile plant and equipment.

Scope 2 – Indirect Emissions:

- Electricity generated off-site of that is consumed on the site.

Reporting of Scope 3 emissions is optional since these emissions are reported as either Scope 1 or Scope 2 emissions from other activities. Accordingly, Scope 3 emissions are not discussed further in this assessment.

7.1 Emission Factors

Based on the identified sources of GHG emissions from the Project, relevant emission factors have been adopted from the National Greenhouse Accounts Factors, September 2020.

Table 7-1 presents the Scope 1 emissions factors used in this assessment.

Table 7-1 - Scope 1 Emission Factors (Transport Fuels)

Fuel Type	Energy Content (GJ/kL)	Emission Factor (kg CO_{2-e}/GJ)		
		CO_2	CH_4	N_2O
Diesel Oil	38.6	69.9	0.1	0.4

Scope 2 emissions have been calculated using an emission factor of 0.81 (kg CO_2-e/kWh), applicable to electricity produced in New South Wales.

7.2 Operational Greenhouse Gas Emissions

Greenhouse gas emissions associated with the operation of the Proposal will result from fuel combusted in mobile plant, and electricity used to power the processing equipment, and in offices. The following section presents an estimation of greenhouse gas emissions associated with the operation of the Proposal.

7.2.1 Fuel Consumption

The estimated annual fuel consumption in facility-owned plant would be 40,000 L. The CO_2-e emissions associated with fuel consumed in facility owned plant are 109 tonnes per annum.

7.2.2 Electricity Use

The estimated annual electricity usage is 40 MWh. The CO_2-e emissions associated with electricity use are 389 tonnes per annum.

7.2.3 Overall Emissions

The total estimated annual operational GHG emissions for the Proposal are 3,300 tCO_2-e and are summarised in **Table 7-2**.

Table 7-2 - Summary of Estimated Operational CO_2-e Emissions

Source	CO_2-e emissions (tonnes)
Diesel	109
Electricity	389
Total	**498**

Australia's total greenhouse gas emissions in 2017 amounted to 554.1 million tonnes of carbon dioxide equivalent (MtCO2-e) (reference: Quarterly Update of Australia's National Greenhouse Gas Inventory: December 2017), whilst New South Wales, in 2017, accounted for 128.87 Mt of the total. Therefore, operation of the Proposal will account for approximately 0.0004% of current NSW emissions.

8 CONCLUSION

RWDI Australia Pty Ltd (incorporating Wilkinson Murray Pty Limited) has been engaged by Visy to provide an air quality impact assessment for a Development Application of an existing Resource Management Facility in Taren Point. Visy operates a recyclable material transfer facility (TRF) and Materials Recyclable Facility (MRF) at 43 Bay Road, Taren Point (the site). The maximum annual throughput of the MRF is 30,000 tonnes. Visy is seeking development consent to operate the TRF and MRF with a maximum annual throughput of 60,000 tonnes.

Potential off-site air quality impacts associated with the operation of the Proposal have been assessed in general accordance with the Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales (EPA, 2016).

Quantitative assessments of potential air quality impacts from the operation of the Proposal have been conducted, based on TAPM meteorological simulations and the AERMOD dispersion modelling system.

The modelling results generally demonstrate compliance with the applicable impact assessment criteria. Due to high existing ambient $PM_{2.5}$ concentrations, the predicted total annual average $PM_{2.5}$ concentrations at nearby receptors exceed the impact assessment criterion. However, the operation of the Proposal has a very small contribution to total $PM_{2.5}$ concentrations at nearby sensitive receptors.

Air quality mitigation and management methods have been identified to reduce air quality impacts associated with the operation of the Proposal and are presented in Section 6.3.

This study has identified sources of greenhouse gas (GHG) emissions associated with the Proposal.

Estimates of equivalent carbon dioxide have been predicted and it has been determined that the operation of the project will account for approximately 0.0004% of current NSW emissions.

It is noted that the Proposal's business activity of resource recovery would potentially have a positive effect on overall carbon emissions by diverting waste from landfill and reducing the need for new raw material generation.

APPENDIX A

CONTOUR PLOTS

Figure A-1 - Contour Plot: Incremental 24-hour PM_{10}

Figure A-2 - Contour Plot: Incremental 24-hour $PM_{2.5}$

Figure A-3 - Contour Plot: Incremental 1-hour NO_2

APPENDIX B

CONTEMPORANEOUS RESULTS (R2)

PM2.5-24-hour average (Highest Background)				PM2.5-24-hour average (Highest Predicted Increment)			
Date	Predicted Increment	Background PM2.5	Total	Date	Predicted Increment	Background PM2.5	Total
6/12/2019	0.028632	86.2	86.22863	21/03/2019	1.444076	12.7	14.19908
4/12/2019	0.019176	84.8	84.81918	17/05/2019	1.206252	12.7	13.90625
11/12/2019	0.042624	70.7	70.74262	19/03/2019	1.205208	4	5.205208
5/12/2019	0.056988	67.8	67.85699	21/04/2019	0.906684	8.7	9.606684
1/11/2019	0.10338	56.4	56.50338	23/03/2019	0.896688	4	4.896688
3/12/2019	0.011352	49.1	49.11135	1/10/2019	0.855408	6.9	7.755408
31/10/2019	0.040392	47.4	47.44039	17/04/2019	0.841608	6.5	7.341608
22/11/2019	0.017316	46.8	46.81732	16/05/2019	0.835092	9.1	9.935092
13/11/2019	0.026688	39.2	39.22669	28/06/2019	0.826752	8.4	9.226752
20/12/2019	0.0867	38.9	38.9867	20/04/2019	0.774708	7.9	8.674708
20/11/2019	0.08322	37.9	37.98322	18/12/2019	0.724884	5.7	6.424884
30/11/2019	0.023292	37.8	37.82329	21/06/2019	0.720072	8.8	9.520072
30/04/2019	0.273048	37.4	37.67305	29/10/2019	0.633792	4.4	5.033792
22/05/2019	0.066432	34.9	34.96643	24/05/2019	0.62844	10.4	11.02844
27/11/2019	0.031392	33.2	33.23139	28/08/2019	0.61686	3.4	4.01686
7/12/2019	0.245484	31	31.24548	27/03/2019	0.5913	6.5	7.0913
22/12/2019	0.05394	31.1	31.15394	18/03/2019	0.580224	2	2.580224
2/11/2019	0.008772	29	29.00877	5/04/2019	0.57582	6.9	7.47582
12/11/2019	0.02664	27	27.02664	19/04/2019	0.55632	7.8	8.35632
3/11/2019	0.006876	26.3	26.30688	16/02/2019	0.54648	5.3	5.84648
8/12/2019	0.069624	26.1	26.16962	28/07/2019	0.538104	8.8	9.338104
25/05/2019	0.049224	22.7	22.74922	9/10/2019	0.522804	5.4	5.922804

PM10-24-hour average (Highest Background)				PM10-24-hour average (Highest Predicted increment)			
Date	Predicted Increment	Background PM10	Total	Date	Predicted Increment	Background PM10	Total
27/11/2019	0.038028	129.4	129.438	21/03/2019	1.909824	10.3	12.20982
6/12/2019	0.03564	115.5	115.5356	19/03/2019	1.516944	8.9	10.41694
11/12/2019	0.054036	105.6	105.654	17/05/2019	1.499076	22.5	23.99908
4/12/2019	0.023844	99.7	99.72384	21/04/2019	1.1313	16.3	17.4313
13/11/2019	0.031968	99.1	99.13197	23/03/2019	1.124172	10.3	11.42417
5/12/2019	0.070596	86.2	86.2706	1/10/2019	1.0782	17.4	18.4782
30/11/2019	0.0291	81.4	81.4291	16/05/2019	1.03878	21.8	22.83878
31/10/2019	0.050616	78.2	78.25062	17/04/2019	1.03596	14.1	15.13596
1/11/2019	0.129024	75.7	75.82902	28/06/2019	1.01706	15	16.01706
20/12/2019	0.110568	75	75.11057	20/04/2019	0.957864	23.7	24.65786
22/11/2019	0.021636	73.2	73.22164	18/12/2019	0.925584	17.7	18.62558
1/01/2020	0.10686	64.7	64.80686	21/06/2019	0.89526	14.9	15.79526
3/12/2019	0.014076	64	64.01408	29/10/2019	0.809916	17.8	18.60992
22/12/2019	0.068136	62.1	62.16814	24/05/2019	0.783132	22.3	23.08313
7/12/2019	0.303432	55.9	56.20343	28/08/2019	0.775572	8.3	9.075572
20/11/2019	0.105996	55.3	55.406	27/03/2019	0.751608	42.5	43.25161
27/10/2019	0.052908	54	54.05291	18/03/2019	0.732924	8.1	8.832924
29/11/2019	0.064344	49	49.06434	5/04/2019	0.728784	16.1	16.82878
8/12/2019	0.086808	48.7	48.78681	17/06/2019	0.714816	8.2	8.914816
22/05/2019	0.083028	47.9	47.98303	19/04/2019	0.705408	21.6	22.30541

TRAFFIC IMPACT ASSESSMENT

Waste Transfer Station and Materials Recovery Facility
43 Bay Road, Taren Point

Reference: 20.225r01v06
Date: May 2022

TRAFFIX
TRAFFIC & TRANSPORT PLANNERS

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DOCUMENT VERIFICATION

Job Number	20.225			
Project	43 Bay Road, Taren Point			
Client	Visy Industries Australia Pty Ltd			
Revision	Date	Prepared By	Checked By	Signed
v06	30/05/2022	Shenara Wanigasekera	Ben Liddell	

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Appendices

Appendix A: Photographic Record

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1. INTRODUCTION

1.1 Overview

TRAFFIX has been commissioned by Visy Industries Australia Pty Ltd to undertake a traffic impact assessment (TIA) in support of a development application (DA) relating to the expansion of a Materials Recovery Facility (MRF) and Transfer Recycling Facility (TRF) located at 43 Bay Road, Taren Point. The following previous Development applications are relevant to the subject site:

- The development is currently approved (under DA01/1268) to process 30,000 tonnes per annum (tpa) of material;
- In 2004, the development was approved (under DA03/1999) to increase throughput from 30,000 tpa to 45,000 tpa. However, no construction certificate/occupation certificate was issued and the DA lapsed; and
- A fire in July 2019 damaged the walls and roof of the development and a DA (DA19/0921) to repair the damage and upgrade the fire management system was approved in February 2020.

The development is located within the Sutherland Shire Council Local Government Area and has been assessed under that Council's controls. This report documents the findings of our investigations and should be read in the context of the Environmental Impact Statement (EIS) prepared separately. The Department of Planning, Industry and Environment has consulted with the Transport for NSW as required by Schedule 3 of the State Environment Planning Policy (Infrastructure) 2007 and their requests have been addressed in Section 9.

The report is structured as follows:

- Section 2: Describes the site and its location
- Section 3: Documents existing traffic conditions
- Section 4: Describes the proposed development
- Section 5: Assesses the parking requirements
- Section 6: Assesses traffic impacts
- Section 7: Discusses Sustainable Travel Plans

- Section 8: Discusses access and internal design aspects
- Section 9: Responds to Stakeholder Input
- Section 10: Presents the overall study conclusions

1.2 SEARs Requirements

This report specifically addresses the technical requirements of the Secretary's Environmental Assessment Requirements (SEARs), which have been reproduced below:

SEARs	Report Reference
Traffic and Transport	
• Details of road transport routes and access to the site	Section 6.3
• Road traffic predictions for the development during operation	Section 6
• Swept path diagrams depicting vehicles entering, exiting and manoeuvring throughout the site	Appendix D
• An assessment of impacts to the safety and function of the road network and the details of any road upgrades required for the development	Section 6

2. LOCATION AND SITE

The subject site is known as 43 Bay Road, Taren Point (Lot 123 of DP815747) and is located on the northern side of Bay Road, northeast of the intersection with Alexander Avenue. It is also located about 2.1 kilometres north of Caringbah Railway Station and approximately 18.8 kilometres southwest of Sydney Central Business District.

The site has a total site area of approximately 6,800m^2 and comprises three (3) buildings (units 1,2 and 3), with Visy occupying units 1, 1A and 2 for their operations. The existing development is comprised of approximately 3,200m^2 GFA of factory uses, 200m^2 GFA of ancillary offices and amenity, 175m^2 of ancillary structures in the southern astern corner and hardstand. It has a frontage to Bay Road measuring 63m and a frontage to Alexander Avenue measuring approximately 114m. It is bounded to the north and east by neighbouring industrial developments for 121.9 metres and 175.7 metres, respectively.

Four (4) access driveways are provided via Bay Road and two (2) vehicular access driveways are provided from Alexander Avenue. It is noted that three (3) southern accesses located on Bay Road are used for customer parking by other tenants on-site. The eastern Bay Road access is utilised by staff and articulated vehicles whilst the Alexander Avenue northern access is utilised by Council's refuse vehicles only.

A Location Plan is presented in **Figure 1**, with a Site Plan presented in **Figure 2**. Reference should also be made to the Photographic Record presented in **Appendix A** which provides an appreciation of the general character of roads and other key attributes in proximity to the site.

Figure 1: Location Plan

Figure 2: Site Plan

3. EXISTING TRAFFIC CONDITIONS

3.1 Road Network

The road hierarchy in the vicinity of the site is shown in **Figure 3** with the following roads of particular interest:

- Taren Point Road: part of a TfNSW Main Road (MR 199) that generally traverses north to south between Rocky Point Road in the north and Kingsway in the south. Taren Point Road is subject to a 70km/h speed zoning and accommodates three (3) lanes of traffic in either direction, separated by a concrete median. The kerbside lanes are subject to clearway restrictions between 6:00am-7:00pm on weekdays and 9:00am-6:00pm on weekends and public holidays.
- Alexander Avenue: a local road that traverses north to south between Smith Street in the north and Bay Road in the south. It is subject to a 50km/h speed zoning and accommodates a single lane of traffic in either direction. Unrestricted kerbside parking is permitted along either side of the road.
- Bay Road: a local road that traverses east to west between Atkinson Road in the east and Taren Point Road in the west. It is subject to a 50km/h speed zoning and accommodates a single lane of traffic in either direction. Unrestricted kerbside parking is permitted along either side of the road.
- Toorak Avenue: a local road that traverses east to west between Alexander Avenue in the east and Taren Point Road in the west. It is subject to a 50km/h speed zoning and a 40km/h school zone operates west of Woodlands Road between 8am-9:30am and 2:30pm-4pm on School Days. Toorak Avenue accommodates a single lane of traffic in either direction and accommodates a combination of unrestricted and restricted kerbside parking.

It can be seen from **Figure 3** that the site is conveniently located to arterial and collector road systems serving the region, with convenient connections to the north and south along Taren Point Road (via Bay Road/Toorak Avenue).

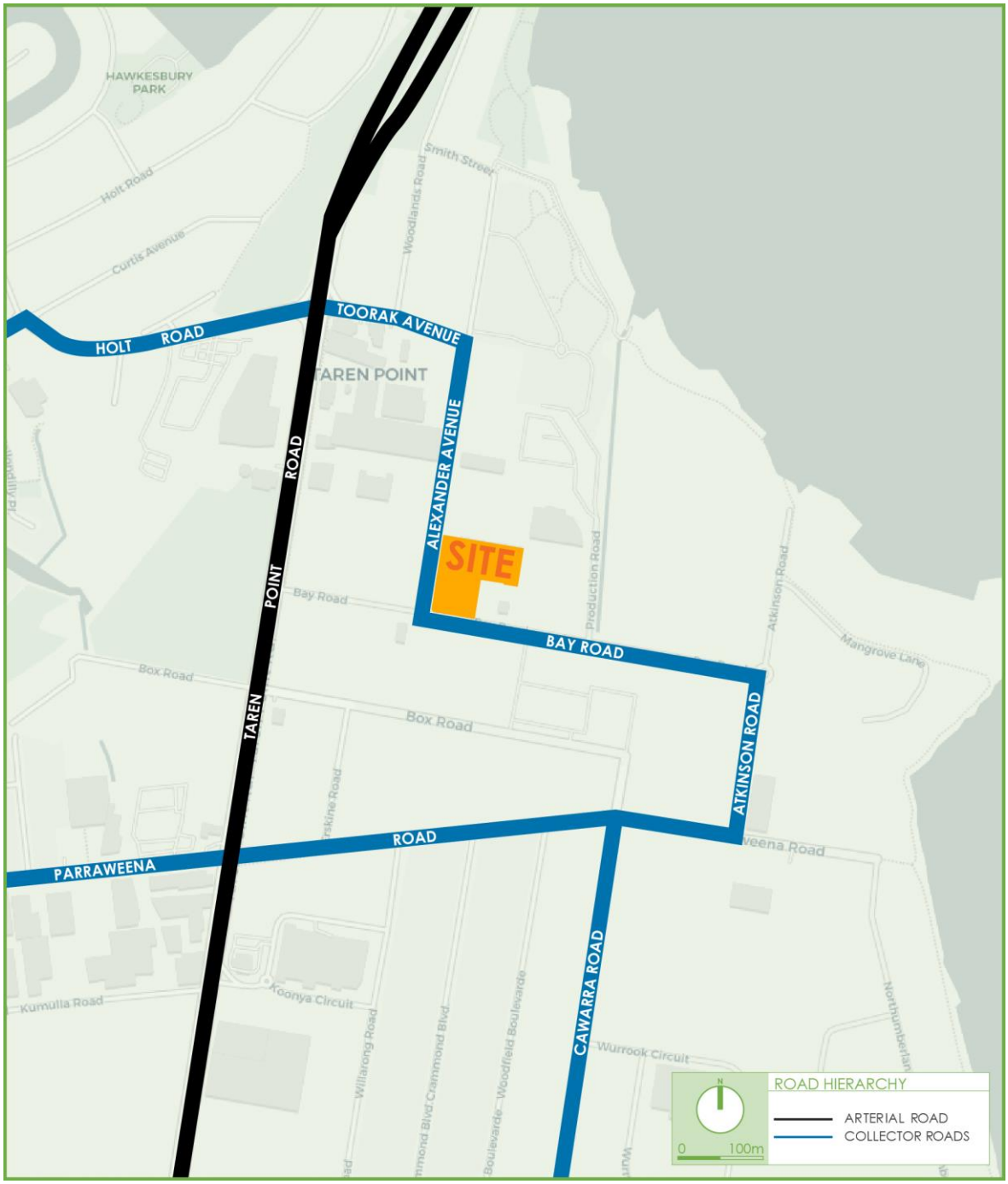


Figure 3: Road Hierarchy

3.2 Public Transport

The subject site is in optimal walking distance of several bus services operating in the locality. These bus services are presented in **Figure 4** and are summarised as follows:

- 477 – Miranda to Rockdale
- 478 – Miranda to Rockdale via Ramsgate

The above services provide connections to centres/railway stations at Miranda and Rockdale which in-turn provide connections to the wider transport network.

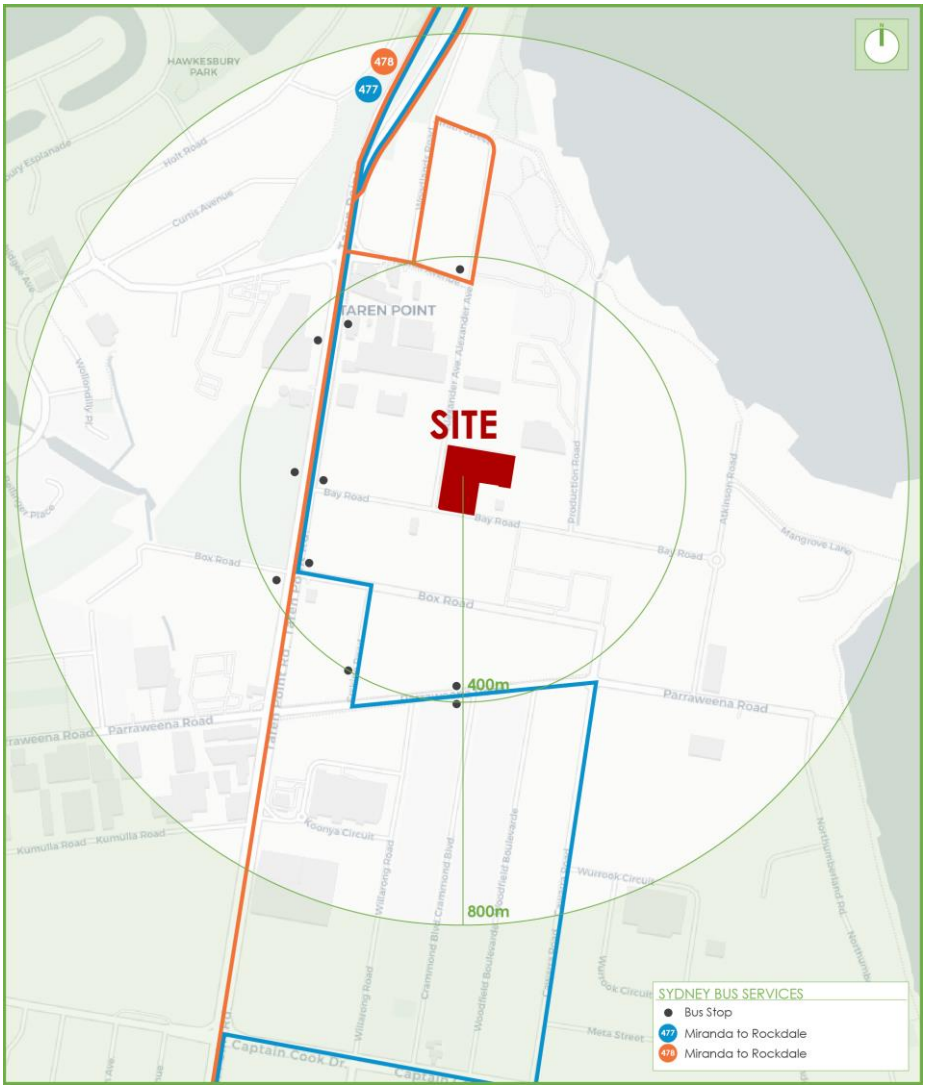


Figure 4: Public Transport

4. DESCRIPTION OF PROPOSED DEVELOPMENT

A detailed description of the proposed development is provided in the Environmental Impact Statement prepared separately. In summary, the development application seeks the following changes to the existing Materials Recovery Facility (MRF) and Transfer Recycling Facility (TRF) at the site:

- Increasing maximum annual throughput from 30,000 tpa to 60,000 tpa. The facility may operate in three (3) different ways:
  - Wholly as a MRF – up to 60,000 tpa
  - Partly as a MRF and partly as a TRF – up to 60,000 tpa. This would occur if the onsite MRF has insufficient capacity to process all the Fully Commingled Recyclable Materials (FCM) received; or
  - Wholly as a TRF – up to 60,000 tpa. This would likely occur if the MRF is not in operation due to repairs / maintenance, or if Visy decides that it is more appropriate for the FCM to be transferred to Visy's network of MRFs rather than being processed on site.
- No expansion to the facility's buildings/machinery as detailed under DA01/1268 or DA19/0921.
- No increase in the number of staff on-site at any one time, except during staff changeover, from the numbers using the site prior to the fire in 2019 under the existing consent as demonstrated in Table 1 in section 6.1.1 and Table 2 in section 6.2.1 below.
- No changes to existing access and carparking arrangements.

The parking and traffic impacts arising from the development are discussed in **Section 5** and **Section 6**. Reference should be made to the plans submitted separately to Council which are presented at reduced scale in **Appendix B**.

5. PARKING REQUIREMENTS

5.1 Car Parking

The site provides a total of 25 car parking spaces as approved under DA01/1268. It should be noted that neither the GFA nor the number of staff onsite at any one time will be increased from the numbers using the site prior to the fire in 2019 under the existing consent as demonstrated in Table 1 in Section 6.1.1 and Table 2 in Section 6.2.1 below. Therefore, reliance will be made on the existing and adequate parking provision.

Whilst the number of staff on-site at any one time will not be altered, the number of shifts is proposed to increase, and this may result in an increased parking demand over short periods of time during changeover. To mitigate this, it is proposed that the end and beginning of the shifts be staggered.

In addition, no changes are made to the accessible parking arrangements.

5.2 Bicycle and Motorcycle Parking

As above, no changes are proposed to the existing parking arrangements. The previously approved DA took into consideration the bicycle and motorcycle parking demands for the proposed number of staff members that will be on-site at any one time. Therefore, the existing arrangements are considered adequate to cater to the site.

5.3 Refuse Collection

This application does not propose an increase to the servicing demands, as such, the existing servicing arrangements shall continue to be sufficient for the development moving forward.

6. TRAFFIC AND TRANSPORT IMPACTS

6.1 Existing Site Generation

6.1.1 Operational Information

Visy Industries Australia has provided the existing operational information which is presented in **Table 1** below:

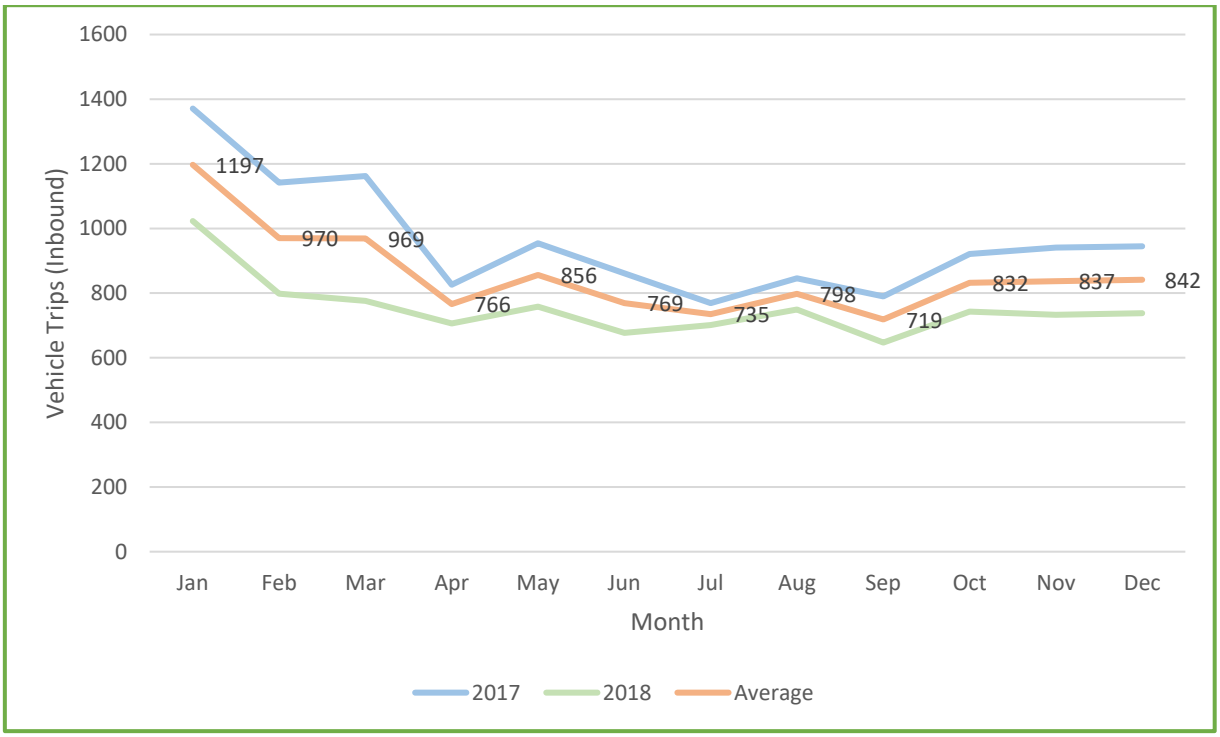
Table 1: Existing Operational Information

Weekday	Shift	Operation Times	Staff Requirements
Monday to Friday	Operational Shift 1	4am – 11am (MRF) 11am – 12pm (Cleaning)	14
	Operational Shift 2	8am – 4pm (Cleaning, loading out material & maintenance)	2
	Office	6am – 5pm	1-3
Saturday	Operational Shift	NA	NA
	Maintenance Shift	6am – 2pm (Maintenance & loading out material)	3
Sunday	NA	NA	NA

6.1.2 MRF Truck Movements

Visy Industries Australia has provided data of the monthly vehicle movements to and from the site between 2017-2019. This data is presented in Chart 1 below, noting that the 2019 data has been omitted due to the July fire, which significantly impacted the site's operation.

Chart 1: Monthly Vehicle Movements (2017-2018)



It can be seen from Chart 1 above that the month of January experiences the highest number of truck movements with an average of 1,197 inbound truck movements per month or 46 inbound trucks per day (averaged over six operating days per week). Truck movements steadily decline throughout the year to an average low of 719 inbound trucks per month or 28 inbound trucks per day in September.

Throughout a typical year there is an average of 10,290 inbound truck movements into the site. The 85th percentile design volume equates to the 10th highest month or 969 inbound trucks per month. This equates to the following truck movements, noting the daily weekday and weekend movements have been rounded down to the nearest whole number.

- 1,938 trucks per month (969 in, 969 out)
- 447.6 trucks per week (223.8 in, 223.8 out)
- 87.1 trucks per weekday (43.6 in, 43.6 out) → 88 trucks per weekday (44 in, 44 out)
- 11.4 trucks per Saturday (5.7 in, 5.7 out) → 12 trucks per Saturday (6 in, 6 out)

Using the typical day vehicle profile provided by Visy Industries Australia, the following peak truck movements (rounded to nearest whole number) are noteworthy:

Weekday Site Peak

- 14 truck movements per hour between 8am-9am (7 in, 7 out); and
- 14 truck movements per hour between 12pm-1pm (7 in, 7 out).

Weekend Site Peak

- 2 truck movements per hour between 9am-10am (1 in, 1 out).

Critical Weekday Network Peak

- 14 truck movements per hour during the AM peak (7 in, 7 out); and
- 2 truck movement per hour during the PM peak (1 in, 1 out).

The facility generally accommodates truck movements between 4am and 4pm on weekdays, 6am to 2pm on Saturdays and is closed for operations on Sundays.

Before the July 2019 fire, the subject facility could receive up to 35 trucks of FCM per day, of which 77%-90% were Sutherland Shire Council vehicles. The site accommodated 100% of Sutherland Shire Council's recycling throughput and accepted FCM from Randwick Council. The current and proposed development clearly provide a vital service for Council's current and future recycling needs.

6.1.3 Staff Movements

As shown in Table 1 above, there is currently up to 19 staff members on-site during a typical weekday and three (3) staff on weekends. The majority of staff arrivals and departures occur outside of the weekday AM and PM network peak periods, thus the existing traffic impacts associated with staff arrivals/departures are minimal.

6.2 Development Trip Generation

6.2.1 Proposed Operational Information

Visy Industries Australia has provided the proposed operational information which is presented in **Table 2** below:

Table 2: Proposed Operational Information

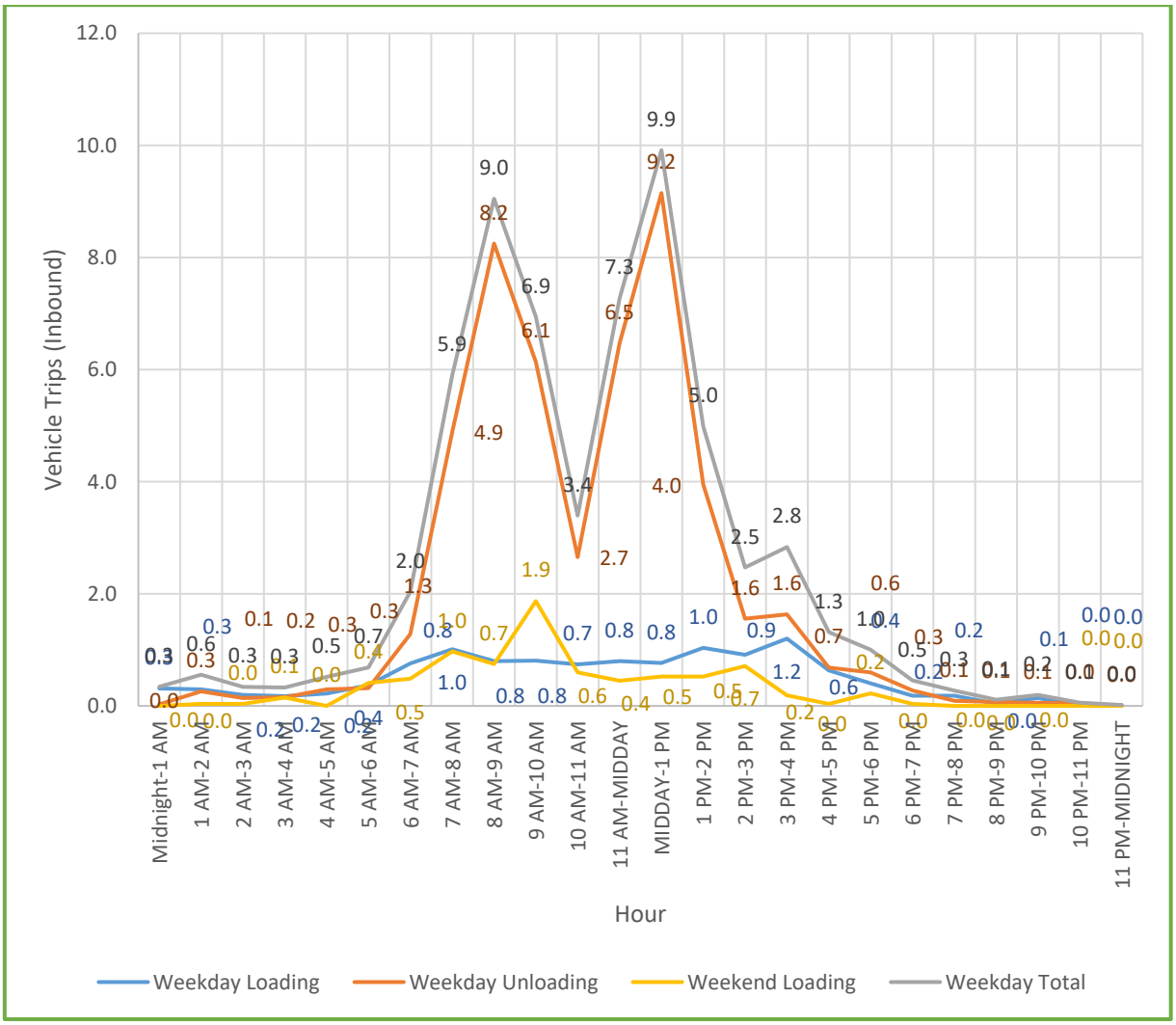
Weekday	Shift	MRF Operation Times	TRF Operation Times	Max. Total Staff No.
Monday to Friday	Operational Shift 1	4am – 5am (Cleaning) 5am – 11am (MRF) 11am – 12pm (Cleaning & maintenance) 14 Staff	4am – 12pm (Receiving and Loading Out) 1-2 Staff	14
	Operational Shift 2	12pm – 1pm (Cleaning & maintenance) 1pm – 8pm (MRF) 14 Staff	12pm – 8pm (Receiving and Loading Out) 1-2 Staff	14
	Operational Shift 3	9pm – 4am (MRF) 14 Staff	NA	14
	Office	6am – 5pm 1-3 Staff	6am – 5pm 1-3 Staff	3
Weekends and Public Holidays	Operational Shift	6am – 2pm (MRF) 2pm – 4pm (Cleaning) 14 Staff	6am – 2pm (Loading out material) 1-2 Staff	14
	Maintenance Shift	6am – 4pm (Maintenance & loading out material) 3 Staff	NA	

6.2.2 MRF & TRF Truck Movements

The proposed development application seeks to double the annual throughput of the facility from 30,000 tpa to 60,000 tpa. This tonnage increase is facilitated by extending MRF/TRF operations and in turn increasing truck movements to/from the site. Truck movements will increase from the 85th percentile volume of 88 vehicles per weekday (44 in, 44 out) and 12 vehicles per Saturday (6 in, 6 out) to an average of 122 vehicles per day (61 in, 61 out) on weekdays and an average of 16 trucks per day (8 in, 8 out) on weekends. The proposal will result in an average net increase of 34 trucks per day (17 in, 17 out) on a typical weekday which is considered the critical assessment.

Visy Industries Australia has provided a typical daily truck movement profile which is presented in **Chart 2** below. This data utilises existing truck movement data which has been normalised to the proposed 60,000 tpa or 61 inbound trucks per weekday and 8 inbound trucks per Saturday.

Chart 2: Expected Average Daily Vehicle Movements



It can be seen from Chart 2 above that the following peak truck movements are noteworthy:

Weekday Site Peak

- 18 truck movements per hour between 8am-9am (9 in, 9 out); and
- 20 truck movements per hour between 12pm-1pm (10 in, 10 out).

Weekend Site Peak

- 4 truck movements per hour between 9am-10am (2 in, 2 out).

Critical Weekday Network Peak

- 18 truck movements per hour during the AM peak (9 in, 9 out); and
- 2 truck movements per hour during the PM peak (1 in, 1 out).

Net Traffic Increase during Weekday Site Peak

- +4 truck movements per hour between 8am-9am (+2 in, +2 out); and
- +6 truck movements per hour between 12pm-1pm (+3 in, +3 out).

Net Traffic Increase during Critical Weekday Network Peak

- +4 truck movements per hour during the AM peak (+2 in, +2 out); and
- ±0 truck movement per hour during the PM peak (±0 in, ±0 out).

6.2.3 Staff Movements

As shown in Table 2, the proposed site operations are separated into three (3) shifts, ensuring that the number of staff on-site does not increase from current numbers. The shift change occurs at 4am (Shift 3 to Shift 1) and will see 14 staff leaving the site and 14 staff arriving to the site. Visy will manage this short-term parking change over period accordingly and could introduce staggered start/finish times should any adverse impacts occur. As with the existing operations, the majority of staff arrivals and departures will continue to occur outside of the weekday AM and PM network peak periods. As such, the proposed staffing arrangements will have minimal impacts to the surrounding road network during critical peak periods and no further assessment is considered necessary.

6.2.4 Overview of Changes

A summary of the changed traffic movements to/from the site is presented in **Table 3** below:

Table 3: Overall Changes Proposed under DA

Existing Operations	Proposed Operations
30,000 tpa	60,000 tpa
Monday – Saturday	Monday - Sunday
Operating 68 hrs/week for MRF/TRF/loading out operations	Operating 140 hrs/week for MRF/TRF/loading out operations
1,938 veh/month (85th %ile)	2,710 veh/month
Average 88 veh/weekday	Average 122 veh/weekday
Average of 12 veh/Saturday	Average of 16 veh/Saturday
14 vehicles (7 in, 7 out) during AM peak	18 vehicles (9 in, 9 out) during AM peak
2 vehicles (1 in, 1 out) during PM peak	2 vehicles (1 in, 1 out) during PM peak
Weekday Staff Requirements 14 Operations 2 Maintenance 3 Office	Weekday Staff Requirements 42 Operations (over 3 x shifts & includes maintenance) 3 Office
Weekend Staff Requirements 0 Operations 3 Maintenance 0 Office	Weekend Staff Requirements 14 Operations 3 Maintenance 0 Office

It is clear from the above traffic volumes that the proposed development will only generate an additional four (4) truck movements during the critical AM peak period and no additional truck movement during the critical PM peak period. This equates to an additional vehicle every 15 minutes during the AM peak.

In addition to the above, it should be noted that the proposed operational hours for the MRF/TRF excluding the office are extending from 68 hrs/week to 140 hrs/week, representing a 105% increase in operational hours over a 7-day week. It is expected that typical daily vehicle movement profile presented in Chart 2 would be "flatter" in reality, noting vehicle movements are likely to be distributed across the entire day from 4am to 4am on weekdays and 6am to 4pm on Saturdays and Sundays. Furthermore, in 2004, the site was approved to accommodate

up to 45,000 tpa, thus the current proposal for 60,000 tpa is only a moderate increase to what has historically been approved.

As such the proposed changes are considered supportable from a traffic planning perspective with no external improvements to the network required.

6.3 Transport Routes

The main entry heavy vehicle entry driveway is located via Bay Road, as per existing operations. Trucks will utilise the intersection of Bay Road and Taren Point Road and on leaving, will either travel north towards Ramsgate or south towards Caringbah. Truck routes to/from the site are presented in **Figure 5** below:

Figure 5: Truck Access Route

6.4 Site Operations – Truck Movements

An Operational Management Plan (OMP) for the site was developed by Visy in November 2019 and is presented in **Appendix C** for ease of reference. In summary, all trucks enter the site via the southern driveway off Bay Road, with the majority of trucks exiting onto Bay Road and some trucks exiting via the Northern-most driveway onto Alexander Avenue. The site permits public access to the community cardboard bin area off Alexander Avenue only.

A truck movement diagram is presented in the OMP which demonstrates how trucks manoeuvre into each loading/unloading area. It is emphasised that this DA is only in relation to the total throughput permitted each year, and that no changes to the location of critical equipment or unloading/loading procedures are proposed. Truck arrivals will continue to be managed by Visy staff to ensure the vehicle queues do not impact Bay Road. Furthermore, the developments peak operating times of 8-9am and 12-1pm will only experience a minor increase of four (4) and six (6) vehicle movements, respectively. This equates to an additional truck every 10-15 minutes, which can be easily managed by Visy staff.

Figure 6 below illustrates the site layout and various materials areas within the site.

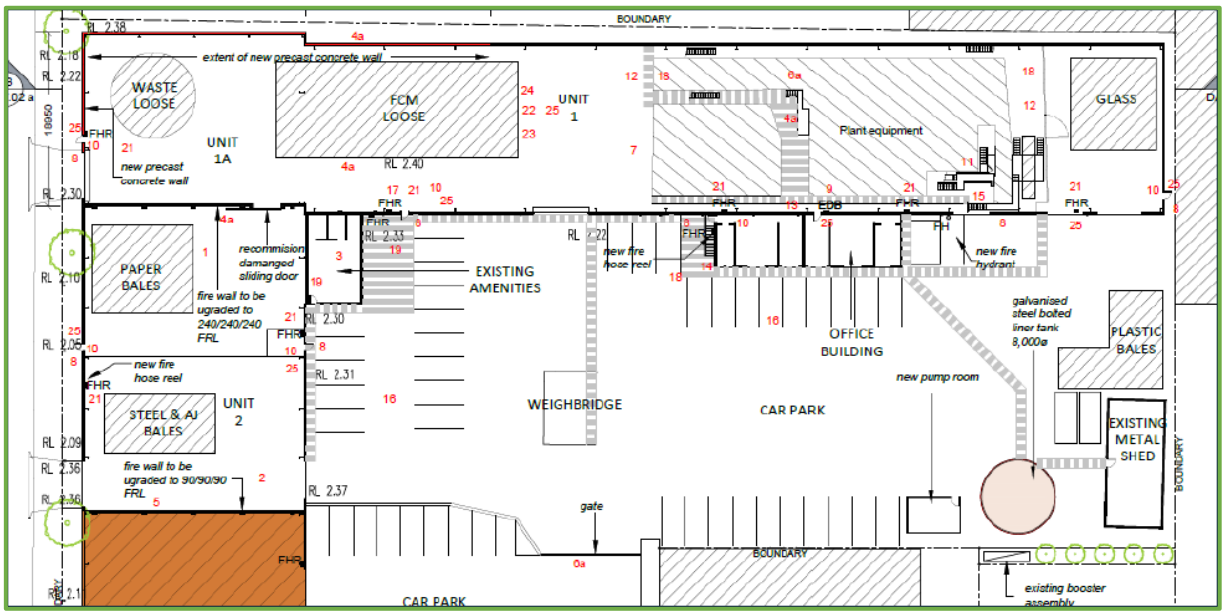


Figure 6: Site Operation Layout

6.5 Driver Facilities

The site provides the typical driver facilities for a Materials Recovery Facility. This includes toilets and tea/coffee facilities. It is noted that drivers rarely make use of these facilities due to the short-term nature of the work undertaken by drivers and the limited space available on-site to accommodate parked trucks for periods of time. In this respect, the existing driver facilities are considered sufficient for this development.

6.6 Dangerous Goods

Visy Industries Australia have advised that the site does not accept dangerous goods. In the rare occurrence that the development receives a gas bottle, battery etc. staff will store these items in a designated isolated area to be picked up and disposed of by a contractor licenced to do so. Additional information to the development hazardous material procedures are presented in the Visy Operational Management Plan.

7. SUSTAINABLE TRAVEL PLANS

7.1 Workplace Travel Plans

A comprehensive Workplace Travel Plan (WTP) can be developed for Visy staff in response to a suitable condition of consent. This plan would encourage the use of public transport and alternative modes of transportation, with the primary objectives outlined as follows:

- Promote the use of sustainable transport methods, thus reducing congestion and pollution in the local area;
- Promote Visy as an innovative and environmentally aware organisation; and
- Provide an active environment by encouraging healthier travel options for staff, such as walking and cycling.

A comprehensive WTP is considered to be an important part of managing the transport demand generated by the development. These plans would provide relevant transport and access information, including:

- Local bus facilities and network maps; and
- Local walking and cycling routes.

Accordingly, the development of a WTP is encouraged to promote alternative modes of transport, noting that these plans are generally more effective for new developments, prior to the establishment of regular travel habits. The main objective of a WTP is to reduce private vehicle usage, consequently the travel targets must be uniquely tailored to encourage alternative modes of transport and carpool schemes.

In this regard, a formal carpool scheme for staff should be considered to reduce the impact of private vehicle usage. The development of such a scheme would assist in actively reducing the reliance on private vehicle usage of the development. It is considered appropriate that a WTP could be prepared in response to a suitable condition of consent, prior to occupation certificate.

7.2 Travel Demand Management

It is envisaged that the reduction in car-based travel modes to achieve any future nominated targets could be facilitated by the following travel demand management measures:

- A Transport Access Guide (TAG) is considered to be a useful travel tool to encourage travel by alternative means other than private cars. This TAG would illustrate the public transport routes operating in the locality and is envisaged to be distributed to all staff. Typically, the TAG forms part of the Workplace Travel Plan developed for the site; and
- Car sharing schemes can be encouraged for staff, reducing the reliance on private vehicles.

8. ACCESS AND INTERNAL DESIGN ASPECTS

8.1 Site Vehicular Access

The development proposes to maintain the existing access arrangements operating under the previously approved DA for the site. As there is no change to vehicle types entering/exiting the site or the number of parking spaces on-site, it is considered appropriate to maintain the accesses as per the existing conditions.

Swept path analysis of the largest design vehicles entering and exiting the site has been included in **Appendix D**, demonstrating satisfactory operation of the existing driveway crossing to Bay Road.

8.2 Internal Design

No changes are proposed to the existing (approved) car parking and loading areas which are expected to be in compliance with the relevant standards at time of approval. As such, no further analysis or assessment is considered warranted.

9. RESPONSES TO STAKEHOLDERS

9.1 Transport for New South Wales

Transport for New South Wales (TfNSW) issued a 'SEARs Request for Input' letter (Ref SYD20/00526/01) in relation to the subject development and provided the below comments. A copy of this correspondence is presented in **Appendix E**. TRAFFIX has provided a response to each comment as shown below.

1) Daily and peak traffic movements likely to be generated by the proposed redevelopment (including vehicle type and the likely arrival and departure times) and volumes likely to be generated during construction and operation, including a description of haul route origins and destinations, including;

(a) An inbound and outbound vehicle profile by time of day and day of week (if travel patterns differ across the week);

(b) Site plan and operating plan to demonstrate that the site will be managed such that queues do not develop on Bay Road;

(c) Site plan showing the proposed layout of the processing plant, storage and handling facilities and truck circulation layout that demonstrates the site will accommodate the most productive vehicle types (noting that the surrounding road network accommodates 25/26 metre B-doubles);

(d) Site layout that illustrates how loading and unloading (including waiting areas) will occur in relation to covered and uncovered areas for the different material types;

(e) Map the catchment for this processing centre to demonstrate that it is located in a suitable location to serve the construction industry from the perspective of not generating additional trips over long distances between construction sites, batching plants, this facility and land fill locations;

(f) Details of the driver facilities provided on site;

(g) Details of the origin/destination of dangerous goods movements to/from the site; and

(h) Swept path diagrams depicting vehicles entering, exiting and manoeuvring throughout the site for both light and heavy vehicles.

TRAFFIX Response

(a) Visy Industries Australia has provided a typical daily vehicle movement profile, and this is provided in Section 6.2.2.

(b) An Operational Management Plan has been prepared by Visy Industries Australia and is presented in **Appendix C**. As discussed in Section 6.4, truck arrivals will continue to be managed by Visy staff to ensure the vehicle queues do not impact Bay Road. Furthermore, the developments peak operating times of 8-9am and 12-1pm will only experience a minor increase of four (4) and six (6) vehicle movements, respectively. This equates to an additional truck every 10-15 minutes, which can be easily managed by Visy staff.

(c) No changes are proposed to the internal layout or operational procedures. The facility will continue to accommodate a variety of truck sizes operated by contractors and local governments.

(d) Loading and unloading areas are outlined in the Operational Management Plan has been prepared by Visy Industries Australia.

(e) The site does not service the construction industry and the focus of the recycling plant is to avoid materials going to landfill. Further, the subject development has been operating for 19 years as a MRF and TRF and has demonstrated that the site is suitably located to facilitate recycling operations. In addition, Visy Industries Australia operates a number of facilities in Sydney, providing alternative, and possibly closer sites, for Visy customers.

(f) Driver facilities are discussed in Section 6.5.

(g) This Visy facility does not accommodate hazardous or dangerous goods as discussed in Section 6.6 and within the OMP provided in **Appendix C**.

(h) Swept path analysis of 20m articulated vehicles entering and exiting the existing driveway are presented in **Appendix D**. As mentioned above, no changes to the location of critical equipment or unloading/loading procedures are proposed, thus the existing site layout will continue to operate satisfactory.

2) The impact of trips generated by the development on nearby intersections, with consideration of the cumulative impacts from other approved developments in the vicinity, and the need/associated funding for, and details of, upgrades or road improvement works, if required (Traffic modelling is to be undertaken using SIDRA network modelling for current and future years). The key intersections to be examined/modelled include:

- *Taren Point Road/Bay Road*
- *Bay Road/ Alexander Road*
- *Bay Road/ Production Road*
- *Bay Road/ Atkinson Road*

TRAFFIX Response

As discussed in Section 6.2.2, the proposal will result in an additional four (4) truck movements in the AM peak period and no additional truck movements in the PM peak period. These trips would be distributed across the surrounding intersections and would have minimal impacts to the level of service, noting that the SIDRA modelling software program is not particularly sensitive to changes of this order and existing levels of service are expected to be maintained.

3) Details of the proposed accesses and the parking provisions associated with the proposed redevelopment including compliance with the requirements of the relevant Australian Standards (ie: turn paths, sight distance requirements, aisle widths, etc).

TRAFFIX Response

No changes are proposed to the parking and access arrangements as detailed in Section 5. The existing facility and internal components are considered acceptable, noting the proposal relates to an increase in truck movements per day and subsequent increase in yearly throughput.

4) Proposed number of car parking spaces and compliance with the appropriate parking codes.

TRAFFIX Response

As discussed in Section 5, the proposal does not seek to increase the number of staff on-site at any one time. This is managed through the implementation three (3) shifts. As such, reliance will be made on the existing approved car parking arrangement.

5) To ensure that the above requirements are fully addressed, the traffic impact assessment must properly ascertain the cumulative study area traffic impacts associated with the redevelopment (and any other known proposed developments in the area). This process provides an opportunity to identify a package of traffic and transport infrastructure measures required to support future development. Regional and local intersection and road improvements, vehicular access options for adjoining sites, public transport needs, the timing and cost of infrastructure works and the identification of funding responsibilities associated with the development should be identified.

TRAFFIX Response

As discussed above, the proposal will result in a negligible change in traffic conditions near the site, noting the SIDRA modelling software program is not particularly sensitive to changes of this magnitude. Whilst TRAFFIX can appreciate the request from TfNSW to ensure nearby intersections (regional and local) continue to operate satisfactorily, the request for the applicant to undertake a cumulative traffic impact study identifying intersection upgrades, vehicle access options for adjoining sites, public transport needs, timings/costings, and funding responsibilities is an abrogation of Council and TfNSW's responsibilities to undertake these strategic planning functions. This obligation is considered unnecessary in the circumstances for the following reasons:

i. Taren Point Road is a strategic road corridor that is undergoing extensive studies in response to State Government initiatives, such as the F6 Section B Motorway Extension. These impacts are of a strategic nature and fundamentally supersede any cumulative impact assessment that may be undertaken.

ii. The anticipated net increase in traffic generation (4 vehicles during the morning peak) equates to a single vehicle every 15 minutes which will be distributed across two (2) approaches at the Taren Point Road/Bay Road intersection. In this regard,

the expected net traffic generation would represent a negligible proportion of total traffic throughput along Taren Point Road during the morning peak period. In addition, SIDRA Modelling program is not particularly sensitive to changes of this order and existing levels of service are expected to be maintained.

iii. It is noted that the EP&A Act and TfSNW Guidelines require a nexus to be established between a development's impacts and any infrastructure improvements that may be required. The subject development generates negligible impacts on the road network and proportionally would contribute negligibly to external network improvements. Hence, any impacts associated with the suggested cumulative impact assessment would not, with respect, advance the assessment process and this aspect has been tested in previous Court proceedings. In particular, the need to include developments that have been submitted and not determined is quite concerning, as development impacts can only be based on what can be termed 'planning certainty' as generally held by the NSW Land and Environment Court.

iv. Even if this requirement were to be undertaken, though this is strongly opposed for the above reasons, it would require a detailed Peer Review of traffic impact assessment reports undertaken for all candidate sites and these would need to be specifically nominated by TfNSW. These reports will all need to include trip generations, traffic generations, trip distributions and proposed improvements for the same time-periods. TfNSW would presumably also provide this same information to all developments that qualify for a 'cumulative assessment', noting that there appears to be no criteria that identifies the 'threshold level' of traffic generation or development intensity that triggers this requirement.

Taking into consideration the above points, the request to undertaken a cumulative traffic study is not considered necessary or warranted in this situation.

6) TfNSW requires the Environmental Assessment report to address the implications of the proposed development for non-car travel modes (including public transport use, walking and cycling); the potential for implementing a location-specific sustainable travel plan (eg 'Travelsmart' or other travel behaviour change initiative); and the provision of facilities to increase the non-car mode share for travel to and from the site. This will entail an assessment of the accessibility of the development site by public transport.

TRAFFIX Response

Section 7 discusses Workplace Travel Plans principles for workers attending the subject site. The applicant welcomes a suitable condition of consent to require a Workplace Travel Plan to be prepared prior to occupation certificate. A Workplace Travel Plan would encourage the use of alternative means of travel to decrease private vehicle trips to and from the site.

7) The detailed traffic impact assessment should address the relevant planning provisions, goals and strategic planning objectives in the following:

- *Future Transport 2056 and supporting documents*
- *Draft NSW Freight and Ports Plans;*
- *Guide to Traffic Generating Developments 2002 (RTA);*
- *TDT 2013/04a Guide to Traffic Generating Developments, and;*
- *Austroads Guide to Traffic Management Part 12: Traffic Impacts of Development.*

TRAFFIX Response

The Traffic Impact Assessment (TIA) takes into consideration the TfNSW Guide to Traffic Generating Developments 2002, TDT 2013/04a Guide to Traffic Generating Developments and Austroads Guide to Traffic Management Part 12: Traffic Impacts of Development in relation to the traffic generation of the development. Consideration has also been given to the NSW Freight and Ports Plan and Future Transport 2056 and supporting documents in relation to overall planning strategy.

10. CONCLUSIONS

The following is noteworthy:

- The proposal seeks approval to expand the materials recovery facility (MRF) and transfer recycling facility (TRF) located at 43 Bay Road, Taren Point. Approval is sought to increase the maximum annual throughput of the site from 30,000 tpa (operating wholly as an MRF) to 60,000 tpa. The facility may operate in the following ways, depending on the demands for each service:
  - Wholly an MRF;
  - Partly an MRF and partly a TRF; or
  - Wholly a TRF.
- The subject site has good connections to bus services that operate along Taren Point Road. These services provide a good opportunity to encourage staff to use sustainable transport modes to/from the site.
- The development provides 25 car parking spaces under the existing approval. This quantum of parking is to remain unchanged and will accommodate all parking demands of the proposed development. No changes are proposed to the existing servicing arrangements of the development.
- Historic and projected truck volume data has been provided to TRAFFIX for assessment. This data was utilised to determine the potential traffic impacts associated with the proposal.
- The traffic generation arising from the development has been assessed as a net change over existing conditions and equates to an additional four (4) vehicle trips per hour during the AM peak and no additional vehicle trip per hour during the PM peak period. This is clearly a negligible increase during the weekday peak periods with no external road improvements required.
- TRAFFIX has responded to TfNSW's Request for Input letter in Section 9.

This traffic impact assessment therefore demonstrates that the subject application is supportable on traffic planning grounds. TRAFFIX anticipates an ongoing involvement during the development approval process.

APPENDIX A

Photographic Record

View looking northeast towards subject site.

View looking north towards Bay Road Access.

View looking east towards intersection of Bay Road and Alexander Avenue.

View looking north along Alexander Avenue.

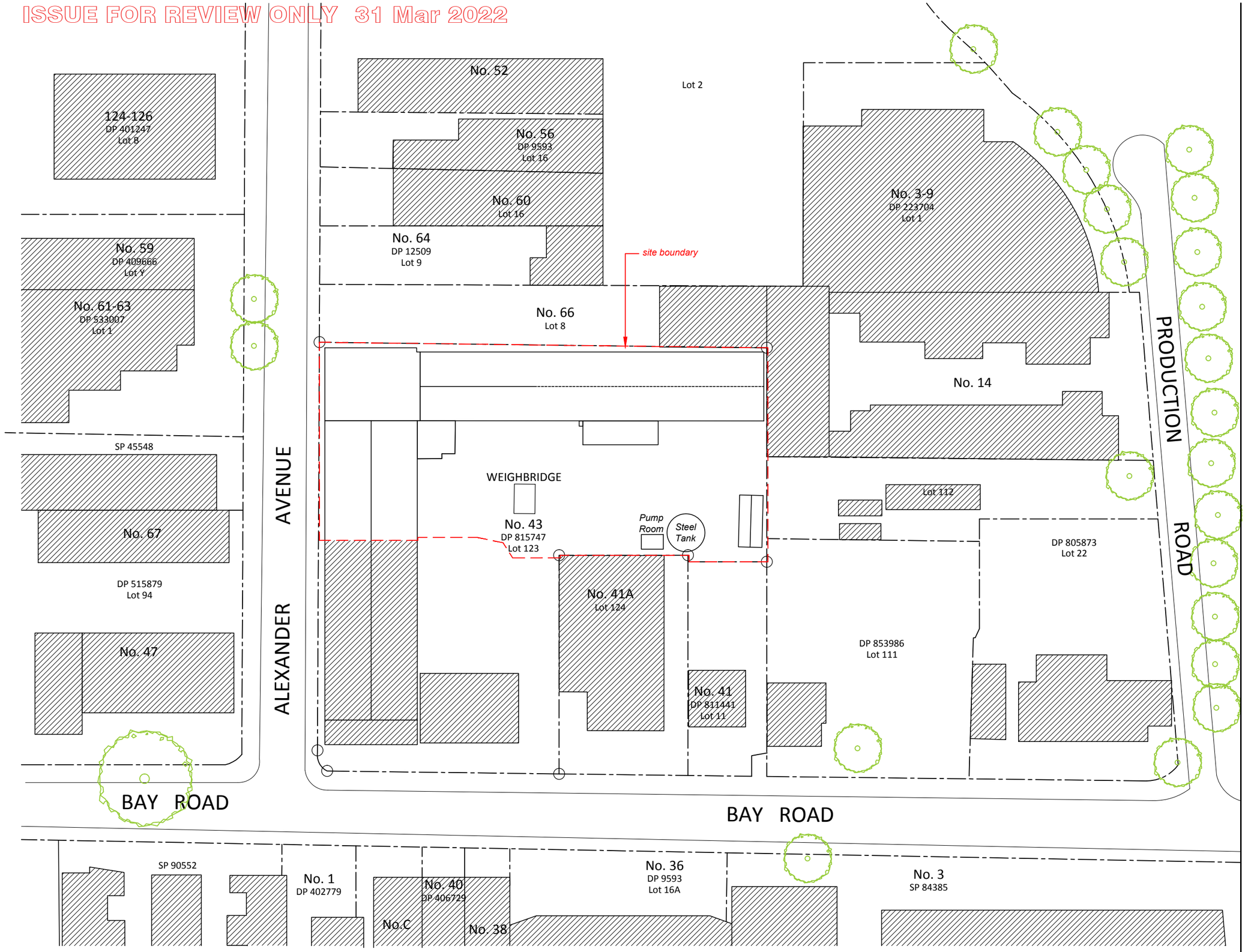
View looking east towards subject site from Alexander Avenue.

View looking east towards subject site from Alexander Avenue.

APPENDIX B

Site Plans

ISSUE FOR REVIEW ONLY 31 Mar 2022



SITE ANALYSIS PLAN
SCALE: 1:1000

TN MN NORTH

N/A N/A PRELIMINARY - FOR REVIEW ONLY

ISSUE DATE DESCRIPTION

ARCHISPECTRUM
Nominated Architect: Martin Bednarczyk | NSW ARB #8912
Suite C5, 8 Allen St, Waterloo NSW 2017 | A.B.N. 40 966 067 144
m: 0419 670 108 | ph: (02) 8399 2807 | e: office@archispectrum.com.au

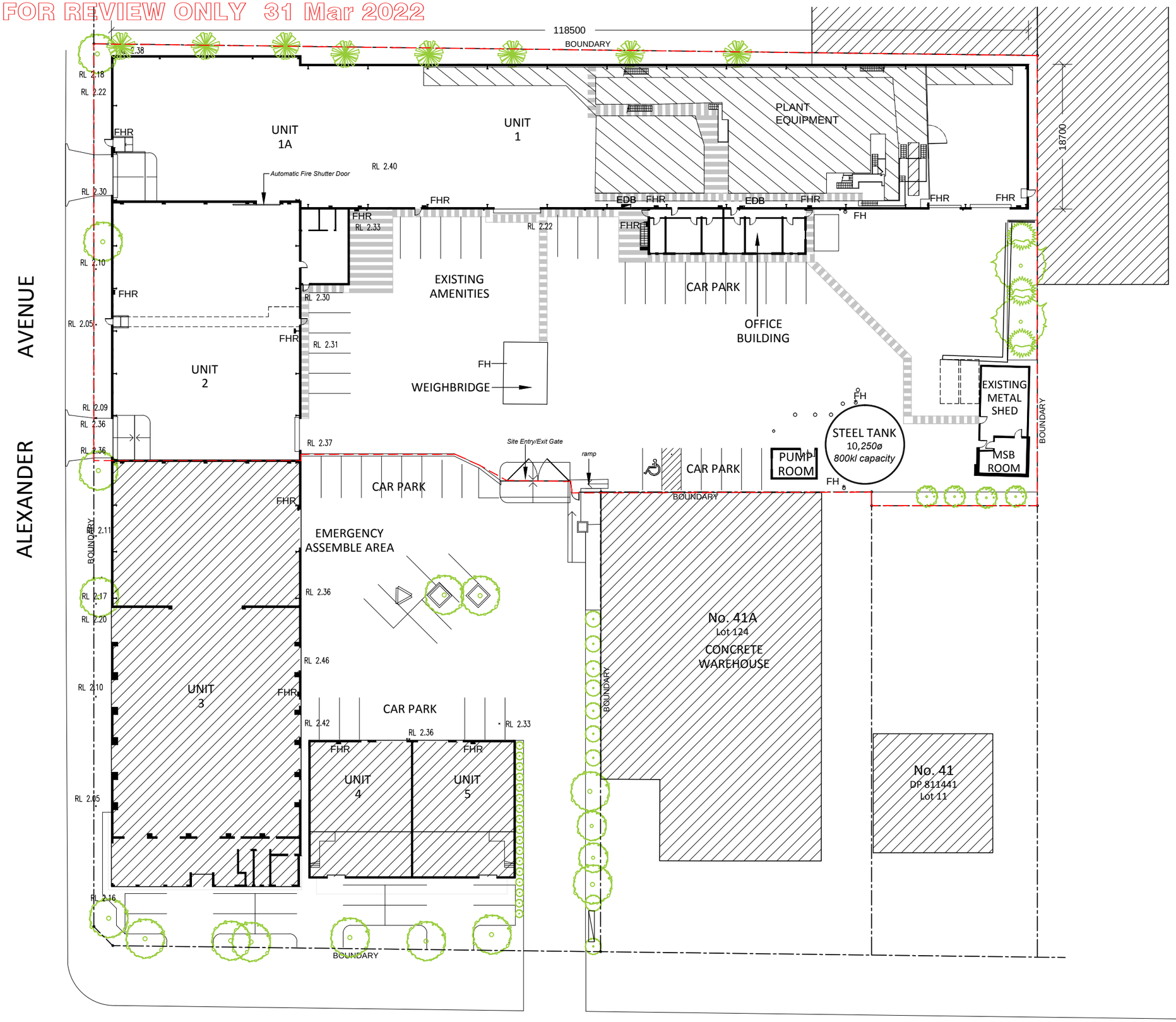
PROJECT:
Resource Management Facility
43 Bay Rd, Taren Point

CLIENT:
VISY Industries
43 Bay Rd, Taren Point

SHEET TITLE:
Site Analysis Plan

SCALE: 1:1000 @ A3 SHEET SIZE: A3 DWG NO: DA01 REVISION: n/a
DRAWN: Peter S

ISSUE FOR REVIEW ONLY 31 Mar 2022



EXISTING GROUND FLOOR PLAN

SCALE: 1:500

LEGEND

FHR	fire hose reel
FH	fire hydrant
EDB	electrical distribution board
	site boundary
	trees
	access footpaths

TN MN NORTH

N/A N/A PRELIMINARY - FOR REVIEW ONLY

ISSUE DATE DESCRIPTION

ARCHISPECTRUM

Nominated Architect: Martin Bednarczyk | NSW ARB #8912
Suite C5, 8 Allen St, Waterloo NSW 2017 | A.B.N. 40 966 067 144
m: 0419 670 108 | ph: (02) 8399 2807 | e: office@archispectrum.com.au

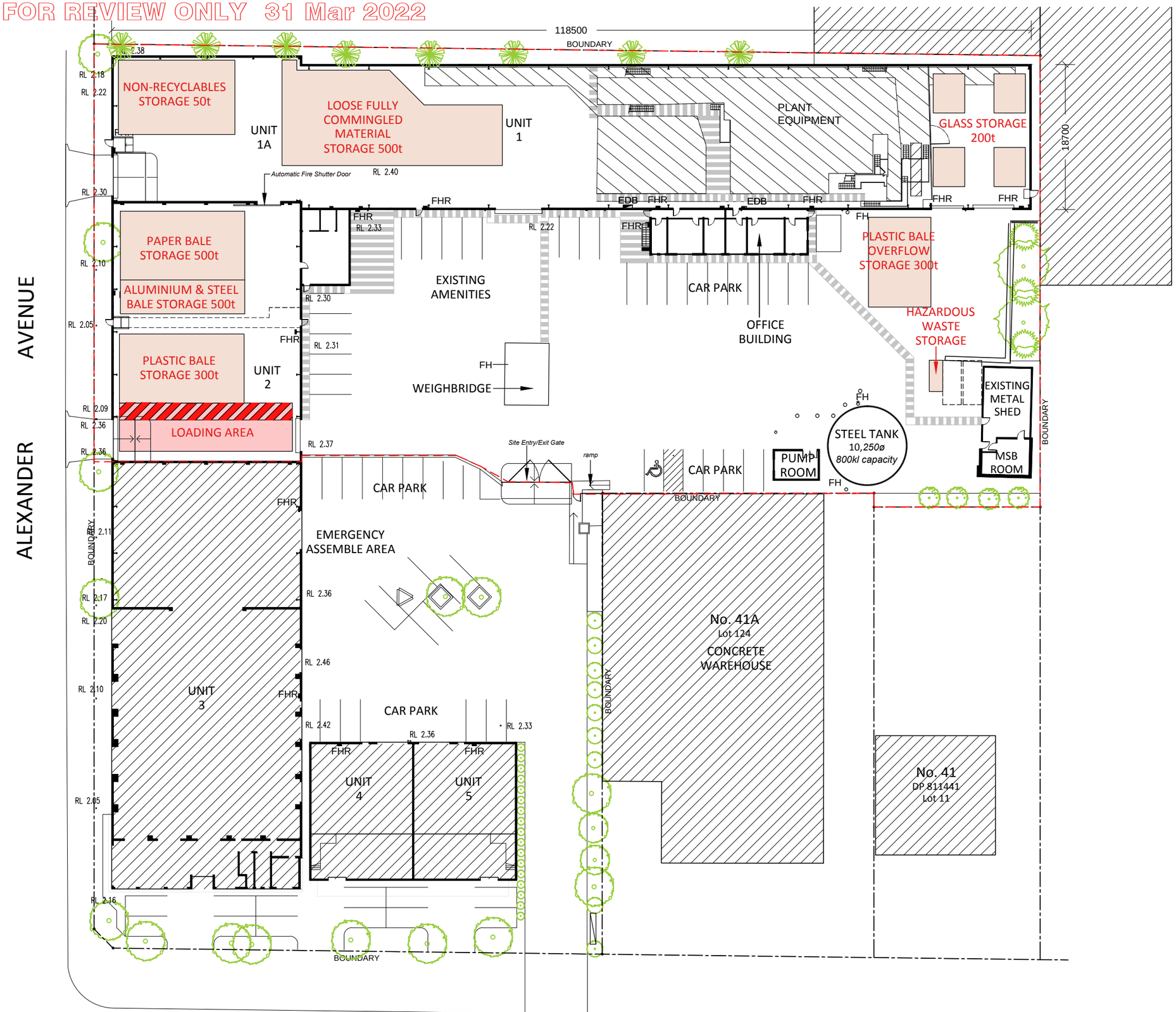
PROJECT:
Resource Management Facility
43 Bay Rd, Taren Point

CLIENT:
VISY Industries
43 Bay Rd, Taren Point

SHEET TITLE:
Existing Ground Floor Plan

SCALE: 1:500 @ A3 SHEET SIZE: A3 DWG NO: DA02 REVISION: n/a
DRAWN: Peter S

ISSUE FOR REVIEW ONLY 31 Mar 2022



STOCKPILE PLAN
SCALE: 1:500

	LEGEND
FHR	fire hose reel
FH	fire hydrant
	site boundary
	access footpaths

TN MN NORTH

N/A N/A PRELIMINARY - FOR REVIEW ONLY

ISSUE DATE DESCRIPTION

ARCHISPECTRUM
Nominated Architect: Martin Bednarczyk | NSW ARB #8912
Suite C5, 8 Allen St, Waterloo NSW 2017 | A.B.N. 40 966 067 144
m: 0419 670 108 | ph: (02) 8399 2807 | e: office@archispectrum.com.au

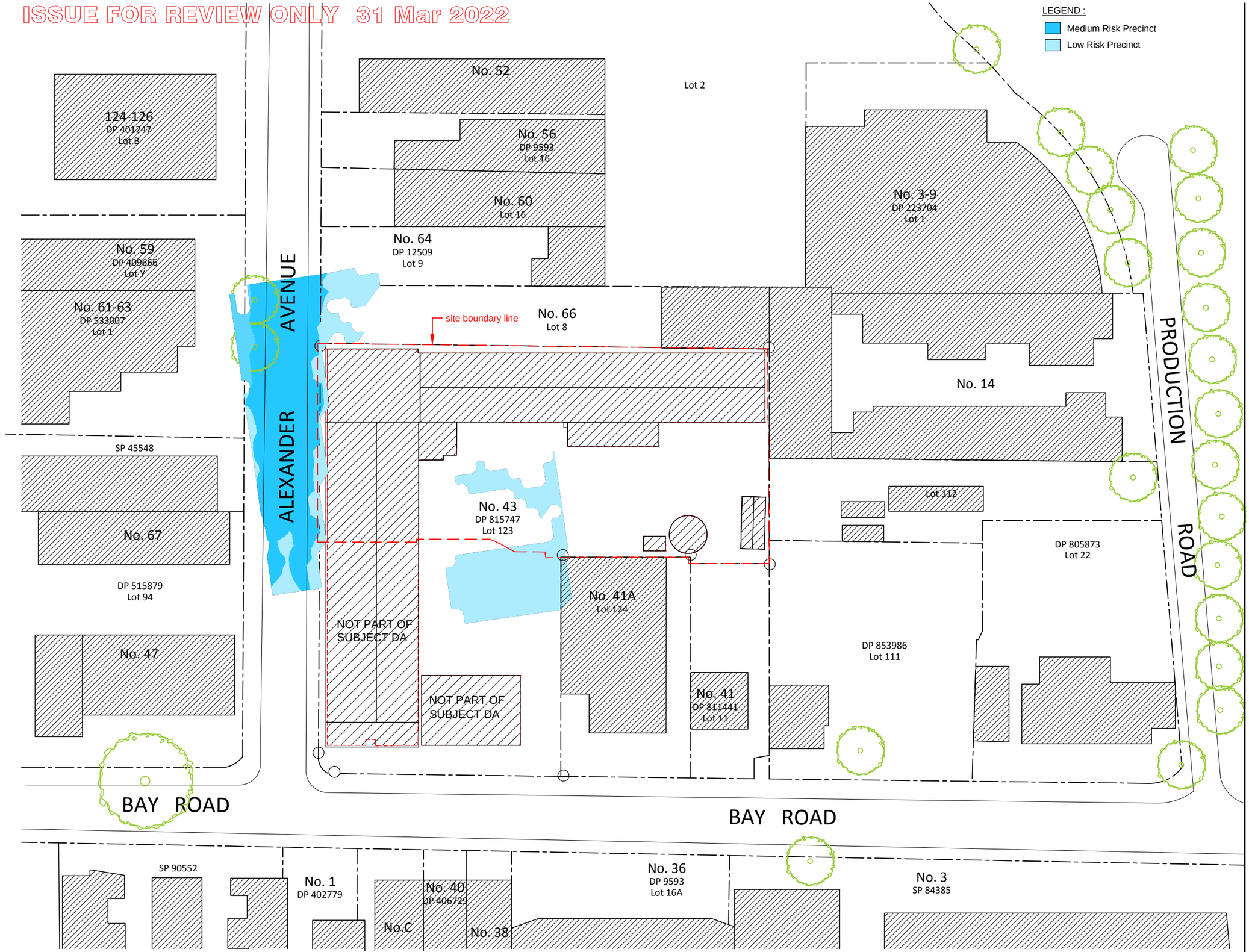
PROJECT:
Resource Management Facility
43 Bay Rd, Taren Point

CLIENT:
VISY Industries
43 Bay Rd, Taren Point

SHEET TITLE:
Stockpile Plan

SCALE: 1:500 @ A3 SHEET SIZE: A3 DWG NO: DA03 REVISION: n/a
DRAWN: Peter S

ISSUE FOR REVIEW ONLY 31 Mar 2022



FLOOD RISK MAP
SCALE: 1:1000

N/A N/A PRELIMINARY - FOR REVIEW ONLY

ISSUE DATE DESCRIPTION

ARCHISPECTRUM
Nominated Architect: Martin Bednarczyk | NSW ARB #8912
Suite C5, 8 Allen St, Waterloo NSW 2017 | A.B.N. 40 966 067 144
m: 0419 670 108 | ph: (02) 8399 2807 | e: office@archispectrum.com.au

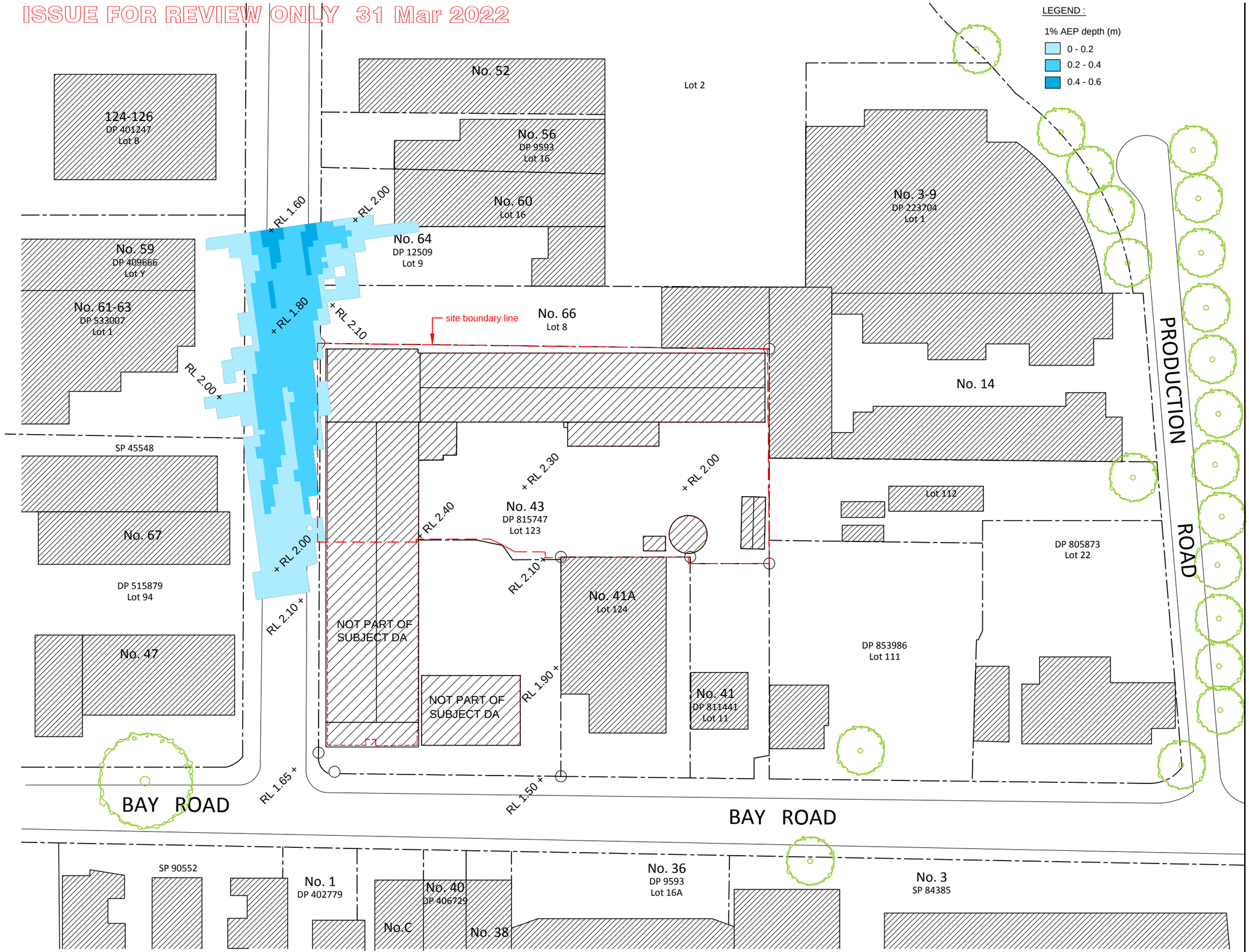
PROJECT:
Resource Management Facility
43 Bay Rd, Taren Point

CLIENT:
VISY Industries
43 Bay Rd, Taren Point

SHEET TITLE:
Flood Risk Management Plan - Flood Risk Map

SCALE: 1:1000 @ A3 SHEET SIZE: A3 DWG NO: DA04 REVISION: n/a
DRAWN: Peter S

ISSUE FOR REVIEW ONLY 31 Mar 2022



1% AEP FLOOD DEPTH

SCALE: 1:1000

N/A N/A PRELIMINARY - FOR REVIEW ONLY

ISSUE DATE DESCRIPTION

ARCHISPECTRUM

Nominated Architect: Martin Bednarczyk | NSW ARB #8912
Suite C5, 8 Allen St, Waterloo NSW 2017 | A.B.N. 40 966 067 144
m: 0419 670 108 | ph: (02) 8399 2807 | e: office@archispectrum.com.au

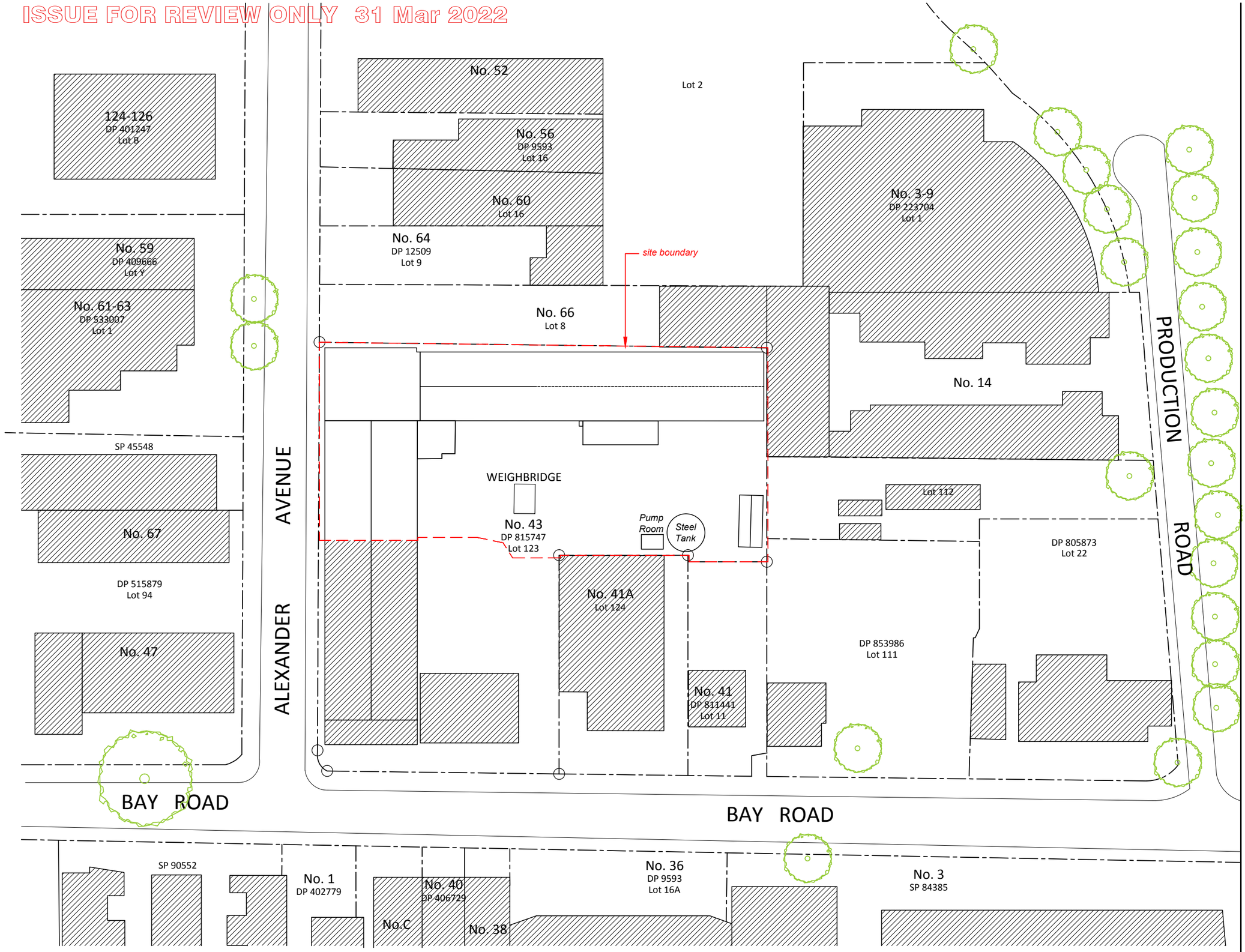
PROJECT:
Resource Management Facility
43 Bay Rd, Taren Point

CLIENT:
VISY Industries
43 Bay Rd, Taren Point

SHEET TITLE:
Flood Risk Management Plan - 1% AEP Flood Depth

SCALE: 1:1000 @ A3 SHEET SIZE: A3 DWG NO: DA05 REVISION: n/a
DRAWN: Peter S

ISSUE FOR REVIEW ONLY 31 Mar 2022



SITE PLAN
SCALE: 1:1000

TN MN NORTH

N/A N/A PRELIMINARY - FOR REVIEW ONLY

ISSUE DATE DESCRIPTION

ARCHISPECTRUM
Nominated Architect: Martin Bednarczyk | NSW ARB #8912
Suite C5, 8 Allen St, Waterloo NSW 2017 | A.B.N. 40 966 067 144
m: 0419 670 108 | ph: (02) 8399 2807 | e: office@archispectrum.com.au

PROJECT:
Resource Management Facility
43 Bay Rd, Taren Point

CLIENT:
VISY Industries
43 Bay Rd, Taren Point

SHEET TITLE:
Notification plan

SCALE: 1:1000 @ A3 SHEET SIZE: DWG NO: REVISION:
DRAWN: Peter S
A3 N01 a n/a

APPENDIX C

Operational Management Plan

Site Specific - Operation Management Plan

(To be used in conjunction with the Visy Management System)

TPMRF

Taren Point Material Recovery Facility

Nov 2019

TABLE OF CONTENTS

1 GENERAL

1.1 Purpose

This Operation Management Plan provides an outline of the operational procedures that are applied to this site to meet operational (quality), safety, and environmental requirements. This document should be used in conjunction with the Visy Management System (VMS).

1.2 Document Control

Document Designation: ***OMP-TPMRF-Rev. 0.1 (JL)***

Date	Revision	No. Pages	Description	Author	Approver	Approval Date
18/11/2019	0.1	?	Draft	Jake Luschwitz		

1.3 Visy Management System

The Visy Management System (VMS) describes the systems and processes to manage our core business activities, risks, opportunities and customer and stakeholder expectations.

VMS sets a minimum standard to achieve sustainability, enhance customer satisfaction, continual improvement and certification to International Standards Organisation (ISO) standards.

The VMS is an integrated business management system based on the quality system structure of ISO standards to enable business units to certify to relevant standards as required to meet business and customer needs. VMS is a compilation and update of existing management systems and improves rather than replaces them. Therefore, any documents created for a specific purpose under previous versions of Visy management systems remain valid under VMS, unless stated otherwise.

We have adopted a process approach for our management system which identifies the top-level processes within Visy (see the list above right), and then we manage each of these. By doing this it reduces the potential for nonconformities and risks are identified in real time.

1.4 Definitions

Term	Definition
Barriers	A barrier is intended to prevent a person walking into the path of the machine – not to restrain the machine. Note: Pedestrian crossings are considered to be unprotected unless there is a physical barrier or pedestrian traffic lights or similar
Competent Person	A person who has acquired through training, qualification, experience or a combination of these, the knowledge and skill enabling that person to correctly perform the required task
Designated Pedestrian Only Walkways	A defined pathway that is in a location that is not process hazardous. Pedestrians shall be segregated from any PME interaction via a barricade or wall, so no PME interaction can occur.
Elevated Work Platform (EWP)	An aerial work platform, also known as an aerial device, elevating work platform, or mobile elevating work platform is a mechanical device used

	to provide temporary access for people or equipment to inaccessible areas, usually at height
FCM	Fully Commingled Recycling -
Forklift / Grab	A Forklift is a powered industrial lift truck equipped with lifting media made up of a mast and elevating load carriage with a pair of fork arms, grab or other load holding devices attached. This includes any type of load carrying counterbalance truck including: Ram trucks, fork-hoists and traditional Forklift.
Front End Loader (FEL)	A machine with a bucket fixed to its front end, having a lift-arm assembly that raises and lowers the bucket. A front-end loader is used in earth moving and loading operations and in rehandling stockpiled materials.
OCC	
PME	Powered Mobile Plant – Any moving vehicle or equipment (I.e. trucks, front end loaders, forklifts, hire equipment, etc.)
Product	Any recyclable or non-recyclable material that is brought in, processed or removed from site as part of the site's main function.
Shared Walkways	A defined pathway that is in a location that is process hazardous. Pedestrians are not able to be segregated from any PME interaction. This pathway is painted with Red and White Stripes.
Site Manager	The manager in charge of an individual business unit at a given location
Skid Steer / Bobcat	A Skid loader, Skid-steer loader, or Skid-steer, is a small rigid frame, engine powered machine with lift arms used to attach a wide variety of labour saving tools and attachments
Visy Management System (VMS)	These are the Visy minimum requirements if the site can not physically meet these requirements then the following process needs to take place. Full risk assessment needs to be undertaken with competent person(s). Consultation with State HSE manger. Consultation with PME Project team.

2 RESPONSIBILITY AND ACCOUNTABILITY

2.1 Site Manager

Management of Taren Point MRF falls under the responsibility of the NSW Eastern Area Operations Manager (the Site Manager).

Manager Title	Name	Phone	Email
NSW Eastern Area Operations Manager	Jake Luschwitz	0499 986 272	jake.luschwitz@visy.com.au

The Site Manager is responsible for daily management of site operations, HSE, supervision, administration and profitability of the facilities, monitoring of production costs and the management of plant maintenance.

2.2 Site Personnel

All site personnel have the responsibility to:

- Apply safety and environmental principles to all daily activities.
- Adhere to all procedures provided and referenced to in this OMP.
- Report accidents or incidents to the Site Manager without delay.

All site personnel will be held accountable for compliance of safety and environmental management in their activities.

2.3 Contractors

All contractors operating on the site must comply with requirements of this OMP, including:

- Making their personnel available for induction and familiarisation with the site.
- Complying with work methods/procedures stipulated for their particular work tasks.
- Ensuring that plant and equipment conforms to the requirements stipulated for the site.
- Meeting regularly with Site Management to discuss operational, safety and environmental management issues.
- Contractor's activities will be inspected from time to time to ensure compliance.

2.4 Visitors

All visitors attending site must comply with requirements of this OMP, including:

- Making themselves available for induction and familiarisation with the site.
- Complying with site personnel's instructions at all times.

3 OPERATIONS

3.1 Site Overview

Site Address: 43 Bay Road Taren Point NSW 2229

The Visy Recycling site at Taren Point is a recyclable material recovery facility (MRF) that performs 2 main roles:

- It is a local kerbside FCM drop-off point for councils in South Eastern Sydney
- It contains a sorting plant that separates paper and cardboard, glass, plastics, aluminium and steel from non-recyclable materials.

3.1.1 Facility Layout

Everyone who is to work at or visit Taren Point MRF is to be inducted or supervised.

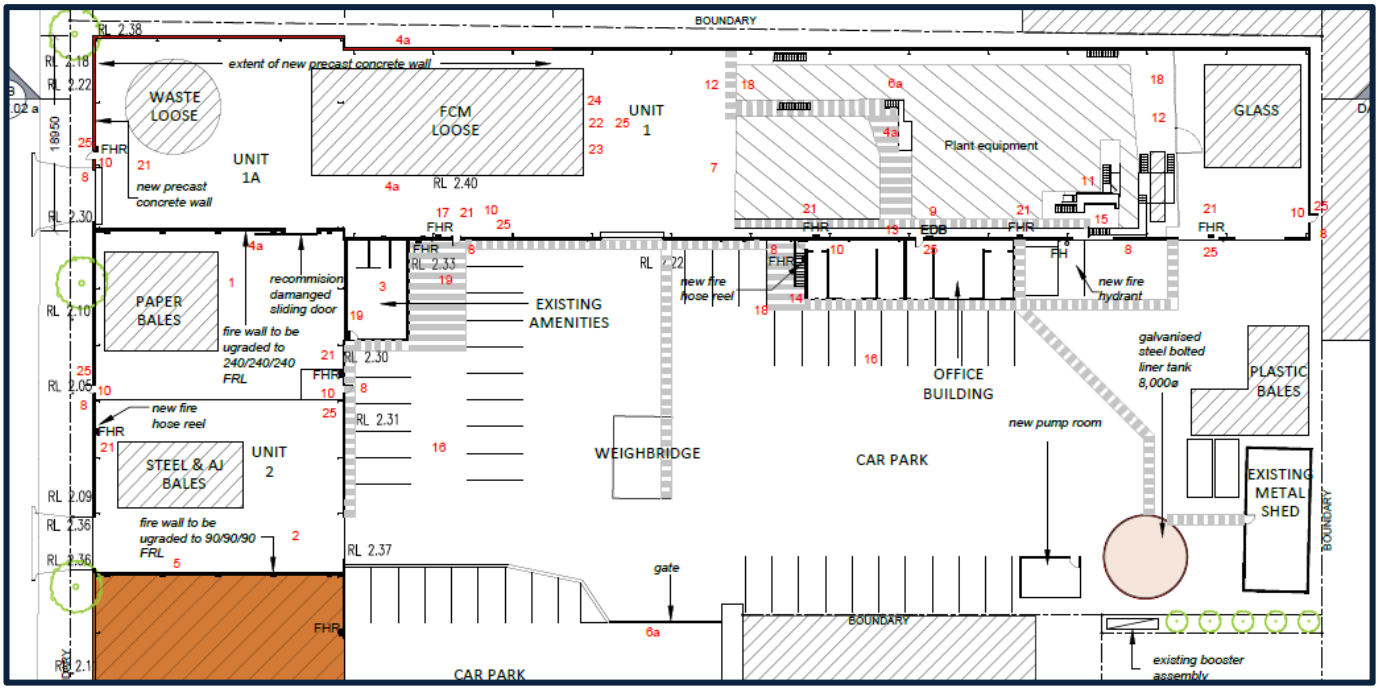


Figure 1 - Operation layout showing stockpile zones.

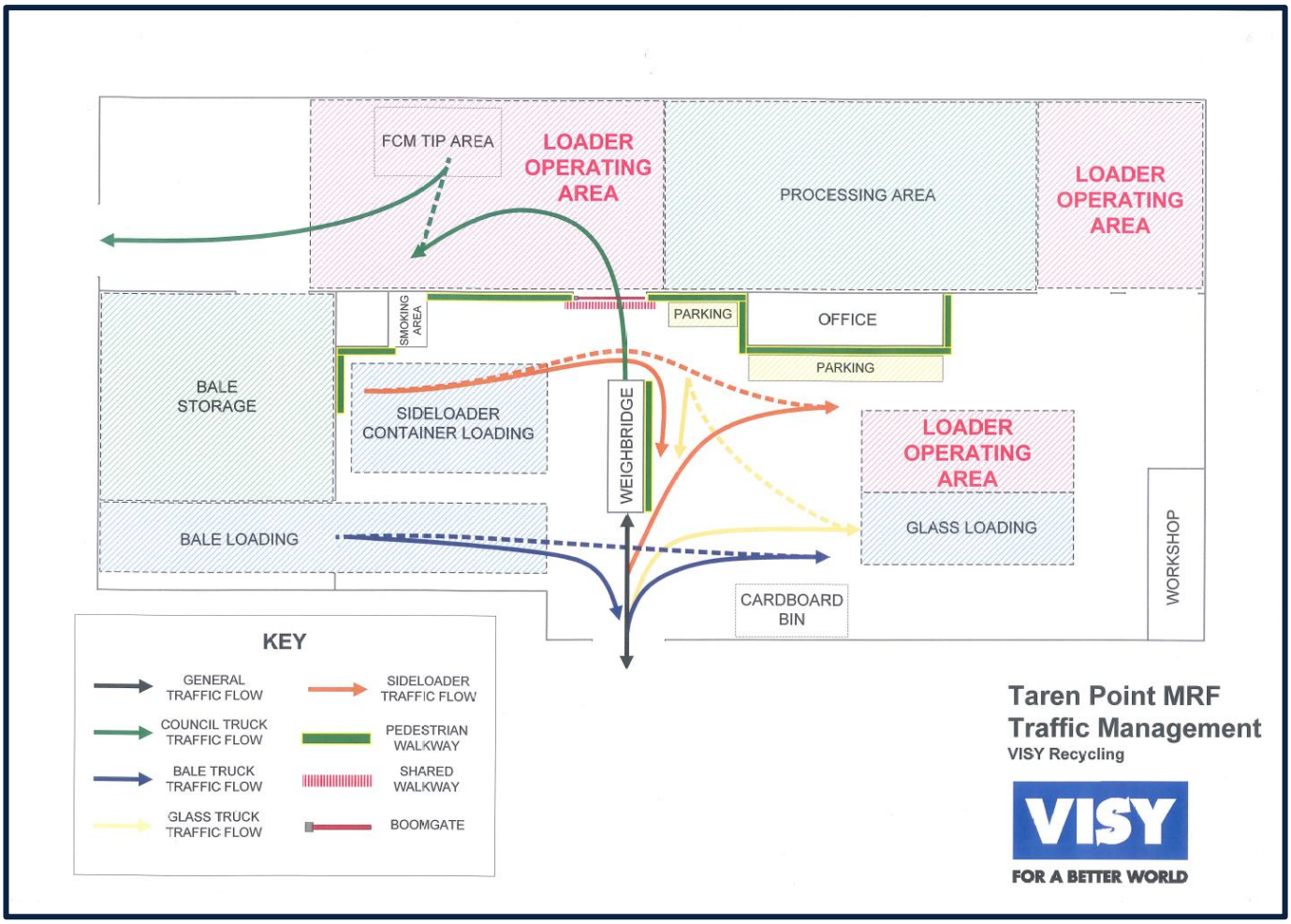


Figure 2 – Traffic Management Diagram.

3.1.2 Nature of On-Site Activities

Public Access & Community Cardboard Bins

The public are not permitted on-site with the exception of accessing the community cardboard bins on Alexander Ave. These large, steel bins are contained within a steel gated area that prevents access to the rest of the site. The bins are emptied using a forklift multiple times per day when full.

Pedestrian Access

A designated pedestrian walkway (shown in Figure 1 as a grey/white zebra pattern) provides access to personnel areas and incorporates barriers for physical separation from PME in line with the *Visy Minimum Standards for Powered Mobile Equipment (PME)* (Part of the VMS).

Weighbridge

Prior to trucks arriving on-site, the customer or vendor will provide vehicle registrations and GVMs and each vehicle will be allocated its own unique scancard.

All trucks must travel over the inbound weighbridge, council trucks use an auto-tare function that replaces the need to weigh out whilst trucks leaving with material weigh as they leave the site also.

The Weighbridge is to be calibrated regularly and the calibration certificates are to be kept on file.

Using the Weighbridge

To utilise a weighbridge, the driver scans their issued scancard across the electronic reader. Once scanned, the weighbridge will issue a receipt, confirming vehicle details and current weight.

If the scancard reader is out of service or the truck's scancard has been misplaced, the truck driver should use the weighbridge phone to contact the Visy weighbridge team and provide their scancard number or registration. The weighbridge team will manually enter information into the system and issue a receipt.

Manual Dockets are to be issued when the weighbridge PC or communications are out of service. These manual dockets should be scanned, the information tabulated sent to the weighbridge team for entry into SAP.

Weighbridge Receipts

Using information gathered at both weighbridges, the weighbridge recording system will automatically log the following information for each truck in Visy's SAP system:

- Site designation & name
- Date and time
- Carrier
- Customer (Source or Destination)
- Purpose of entry (transaction type)
- Vehicle registration number
- Weight of vehicle (Tare)
- Amount of material (Gross - Tare)
- Material type

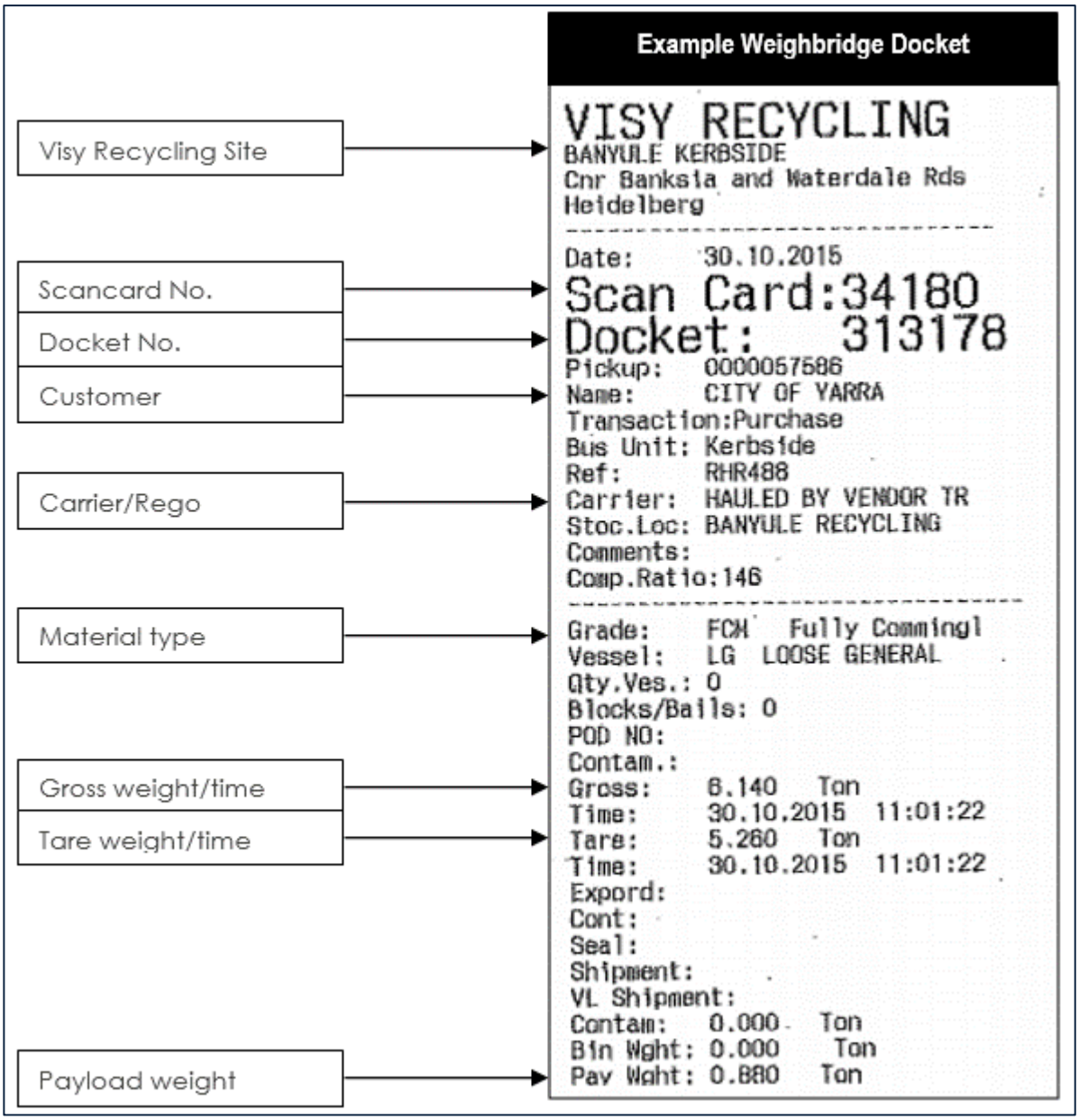


Figure 3 – Example Weighbridge Receipt

Traffic Flow

Access to the site is via a driveway on Bay Road with some trucks exiting the way they came in and some exiting via the Northern-most Alexander Avenue driveway. The South Alexander Avenue driveway allows public access to the community cardboard bins during operational hours.

Vehicle Movements

Unloading FCM

Compactor Trucks unloading FCM can do so one at a time in the FCM AAA. Trucks should drive into the bay, reverse up to the pile, unload, brush off and then leave via the Alexander Ave exit. Trucks should not dally in the FCM AAA. While trucks are in the AAA, the FEL should be parked out of the way with the handbrake on, the bucket on the ground and the ignition off. The loader should not be started up again until it is the only thing in the AAA.

Loading Semi-Trailers

The loading of semi-trailers should occur only in the designated loading area in the bale shed or outside once a loading area has been barricaded from other mobile plant and pedestrians. Forklifts, trucks and personnel in the bale shed should remain 3m from the truck and forklift during loading. Drivers are to remain in the vehicle or in a pedestrian only zone (walkway or office) while loading.

> Trucks should be loaded evenly and not overloaded. See VMS documentation on safe loading of trucks and CoR

Loading Containers

Containers will be unloaded and loaded using a side-loader truck. Forklifts, trucks and personnel in the bale shed should remain 3m from the forklift during loading. Photos should be taken of the bales throughout loading and, once the container has been loaded, the container should be sealed.

Loading Glass

The loading of glass truck and dogs should only be done in the glass bay once the area is barricaded from other mobile plant and pedestrians. A temporary AAA must be set-up as per the *Visy Minimum Standards for Powered Mobile Equipment (PME)* (Part of the VMS). Drivers are to remain in the vehicle or in a pedestrian only zone (walkway or office) while loading.

Loading Non-Recyclables

The loading of walking floor trucks should only be done when the FCM AAA is free of all other vehicles. Forklifts, trucks and personnel in the P&C stockpile bay should remain 10m from the walking floor and loader during loading. Drivers are to remain in the vehicle or in a pedestrian only zone (walkway or office) while loading.

Refuelling PME

A self-contained bunded diesel storage tank (2000 L) is on-site for refuelling PME. Spill kits are nearby for use in the event of any minor spill.

3.2 Product On Site

3.2.1 Handling and Storage

Materials are to be stored in their designated areas as per Figure 1.

Bales

Bales should be transported using the grab forklift and stacked no more than 4 bales high. Paper bales must be stored inside the bale shed.

3.2.2 Accepted Recyclable Materials

The proposed facility will accept fully commingled recyclable material (FCM, up to 30,000 tpa) from municipal kerbside ‘yellow’ bins delivered via kerbside collection trucks. FCM is specified to include:

Paper (such as newspapers, magazines, stationery, office paper);

Cardboard (except waxed cardboard);

Glass bottles and jars (such as beverage bottles, glass condiment jars);

Aluminium (such as cans and foil balls);

Steel and aerosol cans (such as food tins, aerosol cans); and

Rigid plastic packaging including numbered 1 to 7 (not Polystyrene foam).

3.2.3 Contamination (Unaccepted Materials)

In the case of FCM, *contamination* includes but is not limited to garden waste, food scraps, metals other than domestic containers, timber, polystyrene, foam, asphalt, old clothes and cleaning rags, facial tissues and other personal hygiene products, garbage bags and contents and other materials not specifically requested for separation from the domestic waste stream for recycling under the Contract.

With respect to P&C, *contamination* is anything that is not paper or cardboard as defined in each individual supply contract.

Hazardous Materials

“Hazardous Materials” includes but is not limited to free flowing liquids, viscous materials, explosive or materials likely to explode, radioactive material, prescribed wastes (those wastes which are designated by law to be disposed of and not recycled), contaminated or infectious substances (i.e. Hospital wastes) material which is in the process of combustion or likely to combust (i.e. shock absorbers, gas bottles), medical waste and any other like material.

No Hazardous Materials will be accepted by Visy.

Unacceptable items have a range of potential impacts to the MRF operation, including: soft plastic packaging and clothing becoming entangled in rotating equipment causing fouling (operational blocking) and impacting performance; and gas bottles or fibre cement sheeting being potentially hazardous items that pose health and safety issues.

As loads of recyclable materials are unloaded into the FCM receival areas, the loader operator visually inspects each load for large items or large quantities of items of unacceptable waste, such as electronic equipment, and fibre cement sheeting. Unacceptable items not removed during unloading will be removed at the pre-sort station of the MRF. Such items will be removed directly to waste and managed as appropriate for the material.

An FCM load identified as having a large amount of unacceptable material (i.e. >15% of the load) such as concrete, soil, or garden waste will be isolated in the FCM receival bay. The load will be photographed, its origin identified, and a process for its removal and appropriate disposal implemented. Typically, the waste owner (i.e. Council of origin) will be contacted to advise of the contamination and may be required to contribute to removal and disposal costs.

Small items of unacceptable material such as soft plastics and crockery are removed through the MRF process as shown in Figure 4.

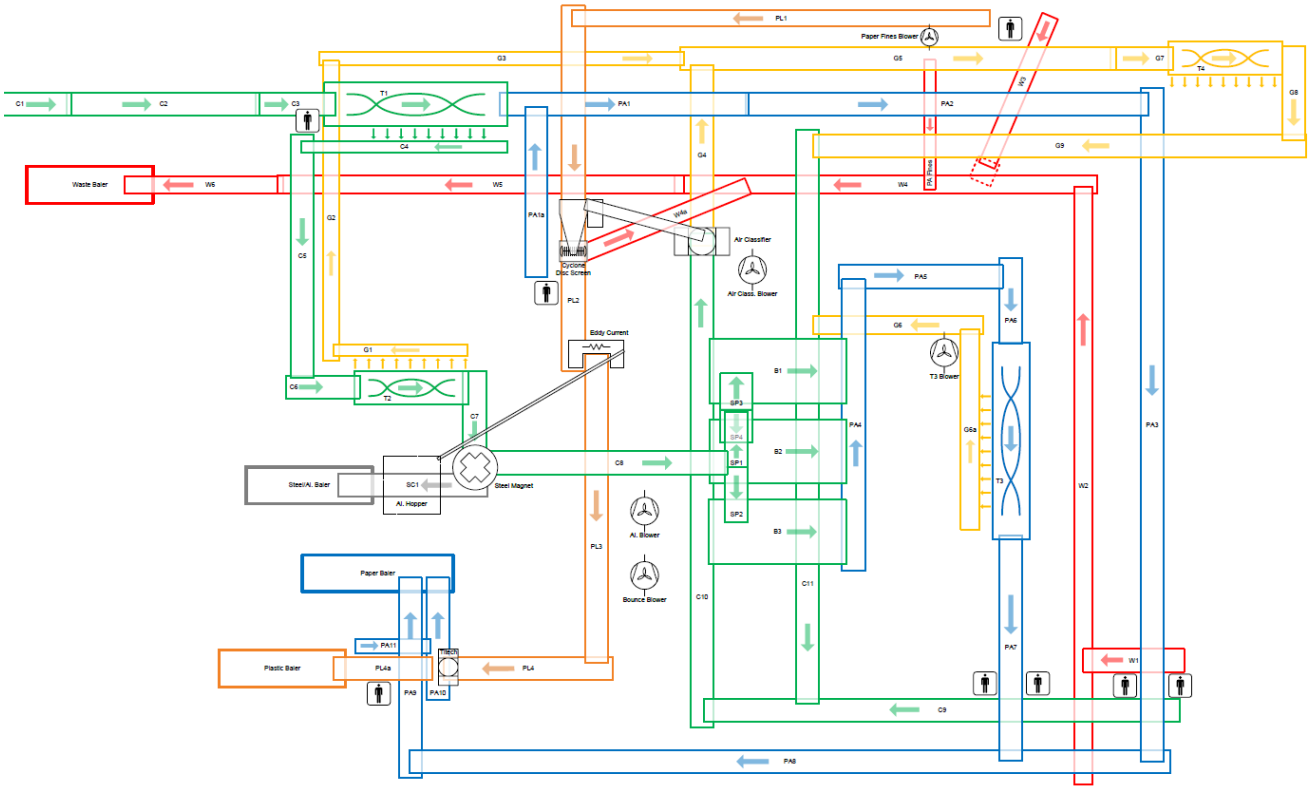


Figure 4 - MRF Equipment Layout

3.2.4 Hazardous Materials

Hazardous waste management comes under the Visy HSE system requirement for each site to have a site and operation specific risk register which identifies safety and environmental hazards and management controls. These include design, procedural and training controls. Key hazardous waste management controls for the facility include:

- Public information about what can and cannot be placed into recyclables bins
- Contracts that identify hazardous waste and that it is not accepted at Visy facilities
- Operation procedures to identify and remove hazardous waste at the receival bay or pre-sort stations
- Designated hazardous waste storage area elevated above 1% AEP flood level and with appropriate containment for the waste type
- Management procedures to dispose of hazardous waste offsite as appropriate for the waste material
- Staff training and awareness about hazardous waste identification, removal, handling and storage.

Storage & Disposal

Hazardous materials are separated from the other material streams and stored safely away from the MRF and stockpiles before being removed from site and disposed of responsibly.

3.3 Fitness for Work

3.3.1 Drug and Alcohol Policy and Testing

See *Alcohol and Other Drugs Policy and Procedure*. The policy covers the activities of all Workers of Visy Recycling NSW (VR-NSW). If a Worker refuses to abide by this policy prior to entry to a VR-NSW site, then that Worker must be refused entry.

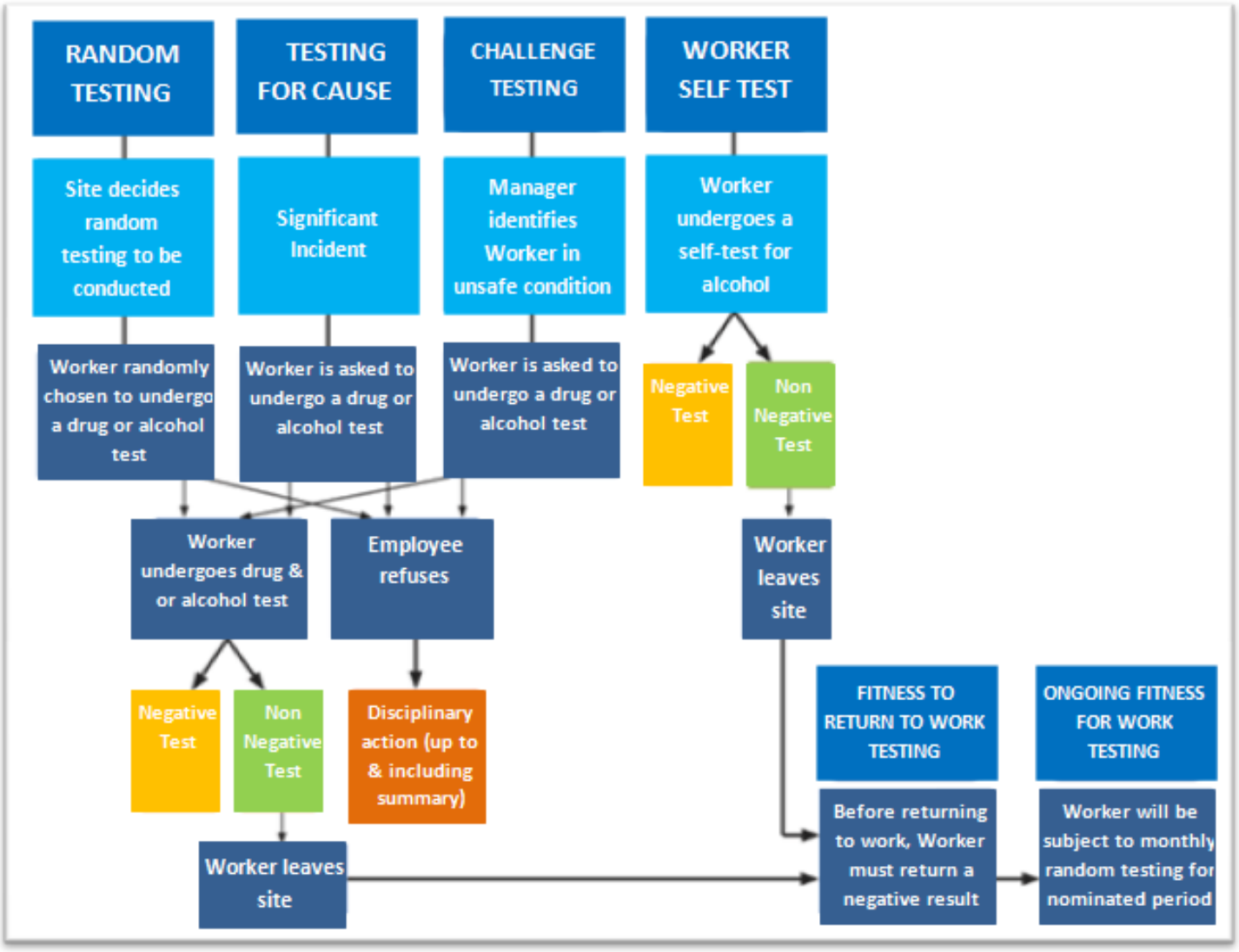


Figure 5 - Summary of D&A testing process

4 ENVIRONMENT

4.1 Identification of Issues

Each activity that has an impact on the environment will be planned at the earliest possible stage to ensure that it can be managed effectively and will be monitored and reviewed for environmental effects during operations. This will be achieved through:

- Identification of environmental aspects as applicable to our activities and contract specifications.
- Determination of legal and other requirements.
- Development of procedures to provide measures that will be incorporated into the activities to ensure that they are controlled.

4.1.1 Identification of Aspects and Potential Impacts (A & I Register)

The site's Aspects and Impacts Register (*HSE 304 Environmental Aspects and Impacts Register (Risk Assessment) Environmental*) provides a detailed assessment of the activities, issues and impacts of operations at the site.

4.1.2 Litter Management

The VMS includes an *Environment Best Practice Guideline* (*Procedure 1205: Stormwater and Litter Management Guideline*) that outlines the minimum standards and provides a framework from which sites can develop a stormwater management plan.

Litter management is required under Visy's HSE system across all sites. Litter is managed at the Taren Point facility by:

- High-risk litter materials are stored within building (Paper and FCM)
- Recovered product stored in designated material storage area/s only
- Routine housekeeping to ensure loose items of any waste are collected and contained
- Daily site inspection checklist including maintaining housekeeping standards
- Brush-down of trucks before leaving AAA

Litter Patrols

To prevent litter nuisance with neighbours as a result of operations, litter patrols are conducted throughout the day.

4.2 Noise Management

Noise is to be managed to ensure neighbours are not adversely affected by MRF operations.

4.3 Odour Control

Glass, non-recyclables and FCM are to be kept indoors and removed from site at a high-rate to prevent unnecessary odours.

4.4 Dust Management

To prevent personnel health issues and an adverse effect on the site's immediate surroundings, as well as provide a nice and presentable workplace, it is important to manage the dust generated from the site's operations. Dust can be brought in on the trucks moving through the

site and in the product. A small amount can also be generated by PME movement as part of the site's normal operation. This dust can then accumulate and be stirred up by site movements.

Routine housekeeping practices are the best method of reducing the amount of dust on floors in traffic areas, and the exhaust extraction ventilation system should help with keeping airborne dust under control.

Daily housekeeping procedures will include the monitoring of dust throughout the site and annual air-quality testing will be performed by an external contractor.

If complaints are received from adjacent neighbours in relation to this environmental concern, we have failed to manage this environmental risk. On receipt of a complaint an 'Environmental Complaints Report' shall be completed in conjunction with an online incident report notification.

The Site Manager is responsible for ensuring implementation of control measures, recording of observations, complaints follow up and implementation of monitoring and corrective actions where applicable.

4.5 Flies and Vermin

To prevent health concerns for personnel and neighbours, it is important to reduce the presence and breeding of vermin. Categories of vermin typically found at waste facilities include:

- Flies & Maggots
- Rats
- Birds (Pigeons, Ibis and Seagulls)
- Feral Cats

The risk can be mitigated by:

- Quick turnover of product
- Effective regular housekeeping practices (I.e. keeping the site clean)
- Targeted fumigation
- Properly maintained rodent bait stations
- Occasional bird control measures

All staff are encouraged to report any observed increase in vermin population to their supervisors or management

If complaints are received from adjacent neighbours in relation to this environmental concern, we have failed to manage this environmental risk. On receipt of a complaint an 'Environmental Complaints Report' shall be completed in conjunction with an online incident report notification.

The Site Manager is responsible for ensuring implementation of control measures, recording of observations, complaints follow up and implementation of monitoring and corrective actions where applicable.

4.6 Stormwater and Leachate

Key Message: Only clean stormwater can be discharged from Visy sites

At Taren Point MRF, leachate is not a problem as glass, waste and FCM are stored indoors.

4.7 Emergency Response

Taren Point has an Emergency Response Plan. The purpose of this Plan is to document procedures for responding to the potential emergency situations that can occur at the site. The procedures should not be considered rigid but rather as flexible guidelines to be adapted to respond to any foreseeable emergency situation and their impact.

5 SAFETY

5.1 Site Inductions & Site Familiarity

To attend site, whether visiting or performing work as a contractor or Visy employee, everybody is required to be inducted, otherwise, they must be escorted at all times by trained site personnel.

If any assistance is required to complete the inductions, please contact the system administrator at learning.development@visy.com.au

5.1.1 The Induction Process

All contractor/visitor inductions expire after 12 months and must be valid when attending site. If your induction is expired, you must be inducted again.

There are 4 induction requirements at Taren Point MRF:

- Visy - HSE - Induction (100-001)
- Visy Recycling - NSW - State Specific Induction (600-002)
- Site Sign-In
- Site tour

Visy and Visy contracted truck drivers are also required to complete the following online induction:

- Visy - Driver - Generic Induction with COR Awareness (103-001)

5.1.2 Online Inductions

The instructions to register in the system and complete the online inductions will be provided by the site manager or procurement manager. These will include a web address and the following details required for registration:

- Vendor Number/Site Authorisation
- Vendor Name
- Site Name
- Visy Person Reporting To

Visy - HSE - Induction (100-001)

Contractor inductions for all Visy sites must be completed every 12 months and before attending site.

Visy Recycling - NSW - State Specific Induction (600-002)

Contractor inductions for all VR NSW sites must be completed every 12 months and before attending site.

5.1.3 On-Site Procedures

Site Sign-In

If you have not visited site before, you must report to the office where you will be directed to sign in.

Site Tour

If working or inspecting production area, a site tour will be provided by a supervisor or manager familiar with the site.

5.2 Personal Protective Equipment (PPE)

The list of minimum PPE mandatory for inside the Production Shed is:

- High Visibility (Hi-Vis) Clothing
- Fully enclosed shoes (if staying on walkways)
- Long pants
- Safety glasses
- Hearing protection

Extra PPE may be required to complete some tasks:

- Safety capped boots are required to leave marked walkways.
- Gloves and long sleeves may be required for some tasks
- A face mask may be recommended for work in some areas

5.3 Training Procedures

Site training is completed in-line with VMS requirements to mitigate risk to HSE and provide the tools and skills to site personnel.

5.4 Identifying and Managing Risks

The VMS uses various tools to identify and manage risks across all Visy sites:

1. Lifesaving Rules
2. Behavioural Audits
3. Observational Hazards
4. Risk Analysis
5. Stop & Think

5.5 PME & Pedestrian Separation

With so much movement of PME on site, it is important to manage the risk. PME at [SITE NAME] is operated by both site personnel and persons external to the business, therefore it is everybody's responsibility to ensure there are no PME related incidents. At Taren Point MRF, it is important to ensure:

6. Only people trained and deemed competent operate PME.
7. Pre-start checks are completed at the start of each shift and equipment is maintained and fit for purpose.
8. a) Seat belts are worn where fitted.
   b) Driving practices are adjusted for conditions, vehicle stability, and compliance limits.
9. Exclusion zones are maintained (i.e. 3m for forklift, 10m for loaders). Walkways and loading areas are defined and AAA controls are followed.

Typical PME on site:

- Council & Contractor Trucks

- Visy or Visy Contractor Trucks
- Forklifts
- Front End Loaders
- EWPs and Hire Equipment

5.5.1 Visy Minimum Standards for Powered Mobile Equipment (PME)

Powered Mobile Equipment (PME) can be some of the most dangerous pieces of equipment in the workplace. The *Visy Minimum Standards for Powered Mobile Equipment (PME)* explains the minimum safety requirements for safe use of PME within Visy. The aim is to reduce the hazard and control the risk associated with PME and their operations.

5.5.2 Exclusion Zones

Pedestrians are required to maintain a separation distance from all operating PME. The distance is 10m for FELs and 3m for all other PME.

PME Category	Exclusion Zone Radius
Front End Loaders	10m
Forklifts	3m
Trucks	3m
EWPs	3m

5.6 Chain of Responsibility

To ensure the risk associated with the hundreds of truck movements each day across Visy is managed, all personnel involved in transport activities, should:

1. Verify a Pre-Departure Declaration is completed prior to any heavy vehicle leaving site with a payload.
2. Ensure vehicles only depart site if safe and compliant with:
    a) Load Restraint Requirements.
    b) Mass and Dimension Requirements.
    c) and the driver has work hours available to complete the task, and the driver appears fit for duty.
3. Verify transport activities allow time for delays (i.e. do not encourage, provide incentive or pressure drivers to speed).
4. Visually check the vehicle appears fit for service and meets maintenance requirements.

5.7 Fixed Plant

5.7.1 Lock Out Tag Out (LOTO)

LOTO is how we ensure that a piece of equipment is isolated from all energy sources (electrical, hydraulic, etc.) prior to being worked on. As part of the VMS, Visy includes the following training documentation on LOTO:

- Level 1 Isolation Training
- Level 2 Isolation Training
- [SWP###] Safe Working on Energised Plant

The LOTO process (Energy source identification, isolation and verification steps) should be included in the SWP for maintenance of each piece of equipment.

NOTE:

Repairs must not be undertaken on energised equipment.

Repairs may only be carried out by competent maintenance team members.

Regardless of the energy type the 3-step lockout procedure consists of:

- STOP the equipment or plant
- LOCK & TAG the equipment or plant
- TEST & TRY the equipment or plant

5.8 Stored Material Collapse

The risk of stored material collapse or fire shall be managed. As Leaders we shall verify:

1. Access in and around storage areas are controlled (i.e. traffic management plans).
2. a) Condition of racking and other storage is regularly inspected for damage.
   b) The racking safe working limit (SWL) is clearly marked on the racking.
   c) Storage is not overloaded, and no loose objects are stored at height.
3. Pyramid stacking, barriers or other controls are used where there is the potential for product to fall.
4. Space and access between bale storage areas are assessed to reduce the risk of fire spreading.

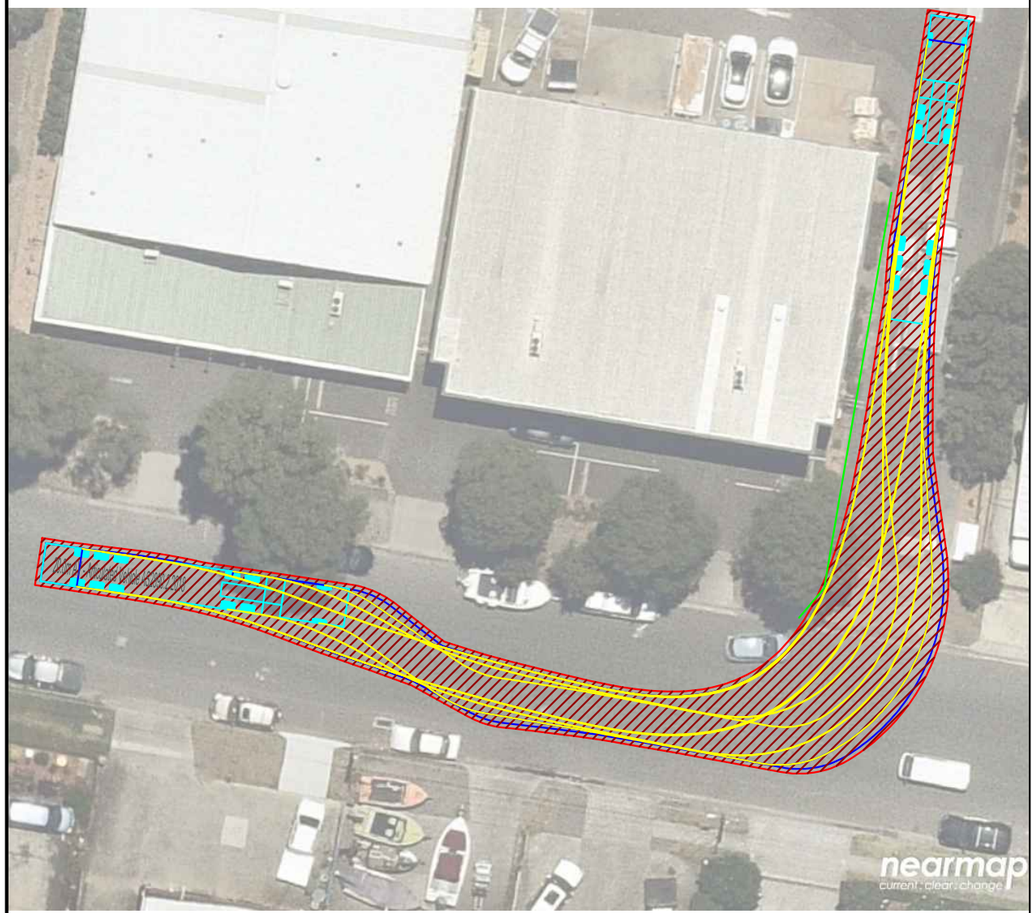
5.9 Manual Handling

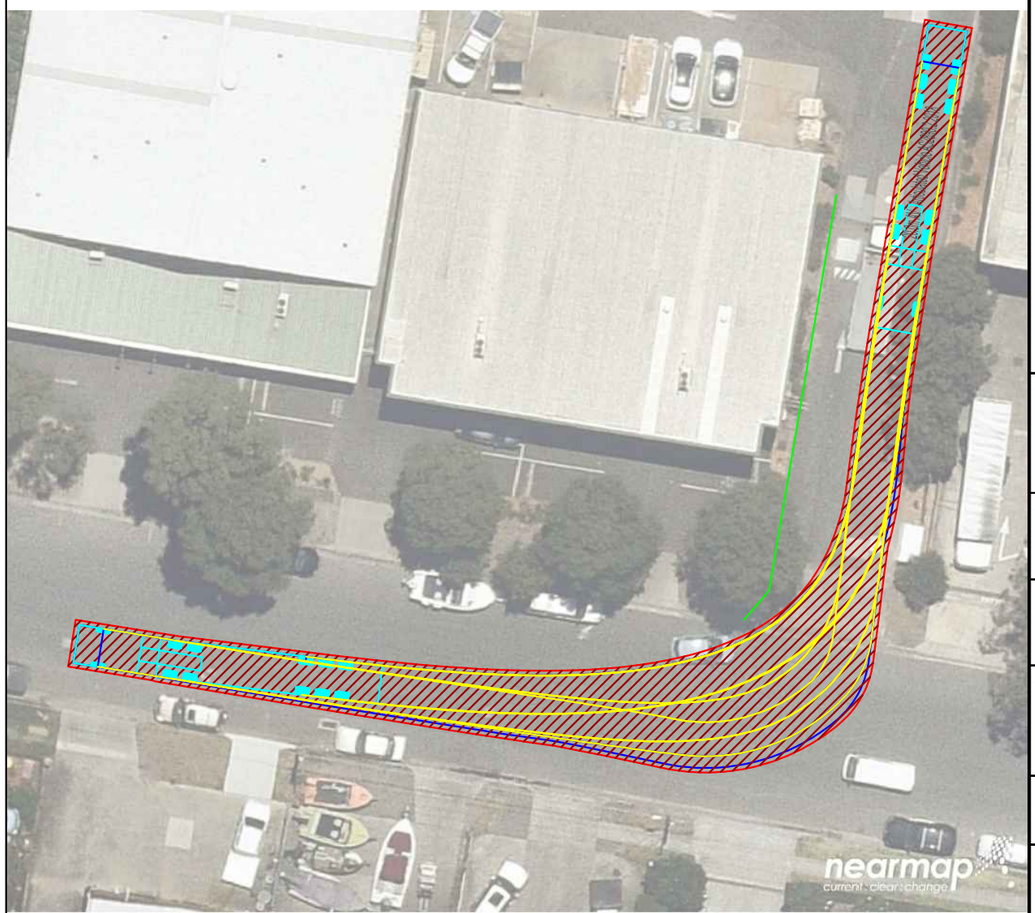
Injuries from manual handling are one of the most common injury types in our business. At Taren Point MRF, it is important to ensure:

1. All personnel are trained and follow correct manual handling techniques.
2. Lifting aids are provided where possible.
3. Rotations are in place for highly repetitive tasks.
4. Work areas are clear of hazards that impact on manual handling tasks.

APPENDIX D

Swept Path Analysis





Notes:

This drawing is prepared for information purposes only. It is not to be used for construction.

TRAFFIX is responsible for vehicle swept path diagrams and/or drawing mark-ups only. Base drawing prepared by others.

Vehicle swept path diagrams prepared using computer generated turning path software and associated CAD drawing platforms. Vehicle data based upon relevant Australian Standards (*AS/NZS 2890.1:2004 Parking facilities - Off-street car parking*, and/or *AS2890.2:2002 Parking facilities - Off-street commercial vehicle facilities*). These standards embody a degree of tolerance, however the vehicle characteristics in these standards represent a suitable design vehicle and do not account for all variations in vehicle dimensions / specifications and/or driver ability or behaviour.

Rev.	Revision Note	By.	Date
A	Swept Path Analysis	SW	09-08-21

Swept Path Legend

- Wheel Path
- Vehicle Body Envelope
- Clearance Envelope (300mm)

Architect

Client
VISY Recycling

Scale / Plan Orientation

0 4 8 12 16m
1:400 @ A3

Project Description
43 Bay Road
TAREN POINT NSW 2229

Drawing Prepared By

TRAFFIX
TRAFFIC & TRANSPORT PLANNERS

Suite 2.08, 50 Holt Street
Surry Hills, NSW 2010
PO Box 1124
Strawberry Hills, NSW 2012

t: +61 2 8324 8700
f: +61 2 9830 4481
w: www.traffix.com.au

Drawing Title
Swept Path Analysis
Truck and Dog
Ground Floor
Left: Entry Movement Right: Exit Movement

Drawn:	Checked:	Date:
SW	BL	09-08-21

20.225d01v01 TRAFFIX [2108XX Plans] Design Review.dwg

Project No.	Drawing Phase	Drawing No.	Rev.
20.225	DA	TX.01	A

APPENDIX E

SEARs and TfNSW Requirements

12 June 2020

Mr Stuart Wilmot
Principal
Urban Perspectives
GPO Box 4507
SYDNEY NSW 2001

File Number: EF20/22317
SEAR 1463

Dear Mr Wilmot,

Waste Management Facilities or Works
43 Bay Road, Taren Point (Lot 123 DP815747)
Planning Secretary's Environmental Assessment Requirements (SEAR) 1463

Thank you for your request for the Planning Secretary's Environmental Assessment Requirements (SEARs) for the preparation of an Environmental Impact Statement (EIS) for the above development proposal. I have attached a copy of these requirements.

In support of your application, you indicated that your proposal is designated development under Part 4 of the *Environmental Planning and Assessment Act 1979.* In preparing the SEARs, the Department of Planning, Industry and Environment (the Department) has consulted with the Environment Protection Authority. Unfortunately, the Environment Protection Authority was unable to respond in time. You must undertake direct consultation with them and address their requirements in the EIS.

The Department has also consulted with the Transport for NSW as required by Schedule 3 of State Environmental Planning Policy (Infrastructure) 2007. A copy of their requirements is attached.

If any integrated approvals are identified before the Development Application (DA) is lodged, you must undertake direct consultation with the relevant agencies, and address their requirements in the EIS.

If your proposal contains any actions that could have a significant impact on matters of National Environmental Significance, then it will require an additional approval under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). This approval is in addition to any approvals required under NSW legislation. If you have any questions about the application of the EPBC Act to your proposal, you should contact the Commonwealth Department of Agriculture, Water and the Environment on (02) 6274 1111.

Should you have any further enquiries, please contact Mary Ellen Trimble, Planning and Assessment, at the Department on (02) 9274 6213 or via maryellen.trimble@planning.nsw.gov.au.

Yours sincerely

Chris Ritchie
Director
Industry Assessments
as delegate of the Planning Secretary

Planning Secretary's Environmental Assessment Requirements

Section 4.12(8) of the *Environmental Planning and Assessment Act 1979*. Schedule 3 of the Environmental Planning and Assessment Regulation 2000.

Designated Development

SEAR Number	1463
Proposal	To increase the processing limit of the recycling and transfer facility up to 60,000 tonnes per annum.
Location	43 Bay Road, Taren Point (Lot 123 DP815747) in the Sutherland local government area.
Applicant	Visy Industries Australia Pty Ltd
Date of Issue	2 June 2020
General Requirements	The Environmental Impact Statement (EIS) must meet the minimum form and content requirements in clauses 6 and 7 of Schedule 2 of the Environmental Planning and Assessment Regulation 2000.
Key Issues	The EIS must include an assessment of all potential impacts of the proposed development on the existing environment (including cumulative impacts if necessary) and develop appropriate measures to avoid, minimise, mitigate and/or manage these potential impacts. As part of the EIS assessment, the following matters must also be addressed: • **strategic and statutory context** – including: - a detailed justification for the proposal and suitability of the site for the development - a demonstration that the proposal is consistent with all relevant planning strategies, environmental planning instruments, development control plans (DCPs), or justification for any inconsistencies – a list of any approvals that must be obtained under any other Act or law before the development may lawfully be carried out. – a description of how the proposed expansion integrates with existing on-site operations – a description of any amendments to and/ or additional licence(s) or approval(s) required to carry out the proposed development. • **suitability of the site** – including: - a detailed justification that the site can accommodate the proposed processing capacity, having regard to the scope of the operations and its environmental impacts and relevant mitigation measures - floor plans depicting the proposed facility layout, including the location of machinery, equipment and waste stockpile locations. • **waste management** – including: - details of the type, quantity and classification of waste to be received at the site - details of the resource outputs and any additional processes for residual waste - details of waste handling including, transport, identification, receipt, stockpiling and quality control – the measures that would be implemented to ensure that the proposed development is consistent with the aims, objectives and guidelines in the *NSW Waste Avoidance and Resource Recovery Strategy 2014-21*.

	• **hazards and risk** – including: - a preliminary risk screening completed in accordance with State Environmental Planning Policy No. 33 – Hazardous and Offensive Development and Applying SEPP 33 (DoP, 2011), with a clear indication of class, quantity and location of all dangerous goods and hazardous materials associated with the development. Should preliminary screening indicate that the project is "potentially hazardous" a Preliminary Hazard Analysis (PHA) must be prepared in accordance with Hazardous Industry Planning Advisory Paper No. 6 - Guidelines for Hazard Analysis (DoP, 2011) and Multi-Level Risk Assessment (DoP, 2011). • **fire and incident management** – including: - technical information on the environmental protection equipment to be installed on the premises such as air, water and noise controls, spill clean-up equipment, fire management (including the location of fire hydrants and water flow rates at the hydrants) and containment measures - details of the size and volume of stockpiles and their arrangements to minimise fire spread and facilitate emergency vehicle access - the measures that would be implemented to ensure that the proposed development is consistent with the aims, objectives and guidelines in the NSW Fire and Rescue guideline *Fire Safety in Waste Facilities dated 27 February 2020*. • **air quality** – including: - a description of all potential sources of air and odour emissions - an air quality impact assessment in accordance with relevant Environment Protection Authority guidelines - a description and appraisal of air quality impact mitigation and monitoring measures. • **noise and vibration** – including: - a description of all potential noise and vibration sources during operation, including road traffic noise - a noise and vibration assessment in accordance with the relevant Environment Protection Authority guidelines - a description and appraisal of noise and vibration mitigation and monitoring measures. • **traffic and transport** – including: - details of road transport routes and access to the site - road traffic predictions for the development during operation - swept path diagrams depicting vehicles entering, exiting and manoeuvring throughout the site - an assessment of impacts to the safety and function of the road network and the details of any road upgrades required for the development. • **visual** – including an impact assessment at private receptors and public vantage points. • **heritage** – including Aboriginal and non-Aboriginal cultural heritage.
Environmental Planning Instruments and other policies	The EIS must assess the proposal against the relevant environmental planning instruments, including but not limited to: • State Environmental Planning Policy (Infrastructure) 2007 • State Environmental Planning Policy (Vegetation in Non-Rural Areas) 2017 • State Environmental Planning Policy No. 19 – Bushland in Urban Areas • State Environmental Planning Policy No. 33 – Hazardous and Offensive Development • Sutherland Local Environmental Plan 2015 • relevant development control plans and section 7.11 plans.
Guidelines	During the preparation of the EIS you should consult the Department's Register of Development Assessment Guidelines which is available on the Department's website at https://www.planning.nsw.gov.au/Assess-and-Regulate/Development-Assessment/Industries. Whilst not exhaustive, this Register contains some of the guidelines, policies, and plans that must be taken into account in the environmental

	assessment of the proposed development.
Consultation	During the preparation of the EIS, you must consult the relevant local, State and Commonwealth government authorities, service providers and community groups, and address any issues they may raise in the EIS. In particular, you should consult with the: • Department of Planning, Industry and Environment, specifically the: o Environment Protection Authority • Transport for NSW • Fire & Rescue NSW • La Perouse Local Aboriginal Land Council • Sutherland Shire Council • the surrounding landowners and occupiers that are likely to be impacted by the proposal. Details of the consultation carried out and issues raised must be included in the EIS.
Further consultation after 2 years	If you do not lodge an application under Section 4.12(8) of the *Environmental Planning and Assessment Act 1979* within 2 years of the issue date of these SEARs, you must consult with the Planning Secretary in relation to any further requirements for lodgement.

Our Reference: SYD20/00526/01
DPIE Reference: SEAR 1463

22 May 2020

The Director, Industry Assessments
Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Attention: Mary Ellen Trimble

Dear Sir/Madam,

SEARS REQUEST FOR INPUT
VISY RESOURCE MANAGEMENT FACILITY
43 BAY ROAD, TAREN POINT

Reference is made to the Department of Planning, Industry, and Environment (DPIE) correspondence via email Portal dated 8 May 2020, regarding the abovementioned application which was referred to Transport for NSW (TfNSW) for comment.

TfNSW has reviewed the submitted information and request the following issues to be addressed as part of the traffic and transport impact assessment of the proposed development:

1. Daily and peak traffic movements likely to be generated by the proposed redevelopment (including vehicle type and the likely arrival and departure times) and volumes likely to be generated during construction and operation, including a description of haul route origins and destinations, including;

    a. An inbound and outbound vehicle profile by time of day and day of week (if travel patterns differ across the week);
    b. Site plan and operating plan to demonstrate that the site will be managed such that queues do not develop on Bay Road;
    c. Site plan showing the proposed layout of the processing plant, storage and handling facilities and truck circulation layout that demonstrates the site will accommodate the most productive vehicle types (noting that the surrounding road network accommodates 25/26 metre B-doubles);
    d. Site layout that illustrates how loading and unloading (including waiting areas) will occur in relation to covered and uncovered areas for the different material types;
    e. Map the catchment for this processing centre to demonstrate that it is located in a suitable location to serve the construction industry from the perspective of not generating additional trips over long distances between construction sites, batching plants, this facility and land fill locations;
    f. Details of the driver facilities provided on site;
    g. Details of the origin/destination of dangerous goods movements to/from the site; and
    h. Swept path diagrams depicting vehicles entering, exiting and manoeuvring throughout the site for both light and heavy vehicles.

2. The impact of trips generated by the development on nearby intersections, with consideration of the cumulative impacts from other approved developments in the vicinity, and the need/associated funding for, and details of, upgrades or road improvement works, if required (Traffic modelling is to be undertaken using SIDRA network modelling for current and future years). The key intersections to be examined/modelled include:

    - Taren Point Road / Bay Road

- Bay Road / Alexander Road
- Bay Road / Production Road
- Bay Road / Atkinson Road

3. Details of the proposed accesses and the parking provisions associated with the proposed redevelopment including compliance with the requirements of the relevant Australian Standards (ie: turn paths, sight distance requirements, aisle widths, etc).

4. Proposed number of car parking spaces and compliance with the appropriate parking codes.

5. To ensure that the above requirements are fully addressed, the traffic impact assessment must properly ascertain the cumulative study area traffic impacts associated with the redevelopment (and any other known proposed developments in the area). This process provides an opportunity to identify a package of traffic and transport infrastructure measures required to support future development. Regional and local intersection and road improvements, vehicular access options for adjoining sites, public transport needs, the timing and cost of infrastructure works and the identification of funding responsibilities associated with the development should be identified.

6. TfNSW requires the Environmental Assessment report to address the implications of the proposed development for non-car travel modes (including public transport use, walking and cycling); the potential for implementing a location-specific sustainable travel plan (eg 'Travelsmart' or other travel behaviour change initiative); and the provision of facilities to increase the non-car mode share for travel to and from the site. This will entail an assessment of the accessibility of the development site by public transport.

7. The detailed traffic impact assessment should address the relevant planning provisions, goals and strategic planning objectives in the following:
    - Future Transport 2056 and supporting documents;
    - Draft NSW Freight and Ports Plans;
    - Guide to Traffic Generating Developments 2002(RTA);
    - TDT 2013/04a Guide to Traffic Generating Developments, and;
    - Austroads Guide to Traffic Management Part 12: Traffic Impacts of Development.

If you have any further inquiries in relation to this development application please contact Narelle Gonzales, Development Assessment Officer, on 0409 541 879 or by email at: development.sydney@rms.nsw.gov.au.

Yours sincerely,

Brendan Pegg
Senior Land Use Planner
Planning and Programs, Greater Sydney

URBAN PERSPECTIVES

URBAN PERSPECTIVES
Suite 405, 88 Foveaux St
Surry Hills NSW 2001

Phone: (02) 8071 4590
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Email:
admin@urbanperspectives.com.au
Website:
www.urbanperspectives.com.au

Urban Perspectives
Environmental Solutions Pty Ltd
ABN: 13 095 904 224

10 November 2022
Our Ref: 321

To:

Daniel Lukic
Development Assessment Officer
Sutherland Shire Council
Locked Bag 17
Sutherland NSW 1499

Dear Daniel,

Re: Designated Development - increase operation of an existing recycling facility at 43 Bay Road, Taren Point (DA22/0632 / PAN-229412)

The following information is provided in response to your letter dated 18 October 2022.

1. Air Quality

a) Can the consultant provide the emissions generated per day in ug/m3, not g/s as they cannot be easily compared to the criteria.

No – They are (2) different metrics. The emissions rate (g/s) is input into our model which then predicts cumulative impacts in ug/m3. Please refer to Appendix A of the air quality report (Appendix H of the EIS), where predictions of PM2.5 and PM10 as incremental increase to 24-hr and annual concentrations are calculated. We can see that impacts due to proposed operations are negligible compared to the assessed air quality levels.

b) Can the consultant provide an assessment against the average background ambient emissions for 3 years as it seems they have picked a bushfire period in which to compare their data to which is not providing an accurate assessment.

The assessment has been made consistent with the Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales. Accordingly, 5-years (2015-2019) of MET data has been considered; then 2019 was selected as generally representative and used for the purpose of this assessment. It has demonstrated that the impacts associated with the proposed operations are negligible compared to the assessed air quality levels. In any given year, there will be events such as bush fires, dust storms and others, where the ambient air quality levels are high. Even if a different year is picked, the general outcome of the assessment would not change.

c) Can the plots indicate the appropriate unit of measurement e.g.: ppm for NO2. Also is Figure A-1 and A-3 measuring the same pollutant or are they labelled incorrectly? Did they do a contour plot or PM10?

RWDI (previously known as Wilkinson Murray) advise Figures A-1 and A-3 were labelled incorrectly. RWDI is currently updating their report with the correct contour plots. The updated report will be sent to Council as soon as it is complete.

d) Are the contour plot pollutant concentrations a measure of the pollutants generated from the proposal or the proposal + ambient concentrations.

The contour plot pollutant concentrations show the incremental increase of pollutants generated and are therefore only the proposal.

e) Greenhouse gas emissions. Could the consultant please clarify whether the assessment was based on full time TFS or full time MRF or combination of both. Please provide assessment of all 3 scenarios.

The assessment was based on worst case use of MRF with a yearly fuel usage of 40,000L.

f) The front-end loader appears to be a major contributor of pollutants. If the MRF runs 24 hours as proposed, then would the current 16 operational hours used in the calculations be increased to 24 hours if it is required to constantly place material on the MRF conveyor belt? If yes, please recalculate emissions. Could the consultant also assess ways that the emissions from this vehicle could be reduced.

The loader will not run non-stop for the duration of the 24hrs operation and therefore a 16-hr usage per day has been used in this assessment.

2. Clarification

a) The plan titled 'Existing Ground Floor Plans' Drawing DA02a denotes the shipping containers as being 'temporary'. Page 25 of the EIS describes the 2 containers are being used for storage. Is there a timeframe for their removal from the site and for a permanent structure to be constructed in their place? If so, what is the timeframe for their removal and will plans be submitted in response proposing a new structure? Alternatively, is consent now sought for their permanent retention?

The shipping containers are being used for storage and we will seek consent for them to remain.

b) No bicycle parking spaces are proposed as part of this application. Given the expansion of hours of operation and staffing levels, the application must be amended to comply. In this regard, an amended plan can be submitted or alternatively, a condition can be imposed requiring the provision of 3 spaces. As identified in the EIS, these spaces should be located as close as possible to the office building or the lunchroom.

Visy will provide a rack for at least 3 bicycles near the office at the Eastern end of the existing carpark spaces along the Southern side of the office building. Visy is willing to accept a condition to provide 3 bicycle spaces.

c) Despite showering facilities not being required as part of the previous application, given the expansion of hours in operation and staffing levels, showering facilities must be provided. Details must be provided on the plans.

Plans showing the location of the shower are attached (Appendix A).

d) Council does not support the storage of hazardous materials in an unroofed area. The site inspection revealed items were being stored on bunded platforms but not weather protected. These storage facilities must be weather protected at all times to ensure bunding does not overflow during sustained periods of wet weather and to prevent breeding of insects. As discussed onsite, existing bunding areas can be located under the existing rooved area adjacent to the shipping containers or a new roof be proposed to ensure weather protection. Please detail which action will be undertaken and if a new roof or storage facility is proposed, the plans must be amended.

Storage of hazardous materials and bunding has been relocated to the existing roofed area adjacent to the shipping containers.

e) DA19/0921 accepted a variation and for only 25 parking spaces to be provided. However, given the expansion of hours in operation and staffing increases, Council's Traffic Section have raised issues with possibly conflict during the changeover time when potentially 19 cars are entering the site while 19 cars are leaving the site. Page 90 of the EIS highlights staggering of start and finishing times between shifts. This is considered to be a proactive approach to ensuring minimal conflict within and external of the site. Further details are requested on how this will work particularly during the 8am to 5pm period when there is no on-street parking capacity. Consideration should be given to providing additional parking to satisfy the requirements of SSDCP2015 which may alleviate concerns of internal parking conflict.

Cleaning and maintenance periods have been arranged at the start/end of shift to allow for the staggered shift start/end between 11am and 1pm (refer to Table 3.5 of the EIS). Nine (9) staff will leave the site at approximately 11am each day and 5 staff will perform cleaning/maintenance tasks until approximately 12pm. At 1pm 9 staff will arrive to commence the next shift. Making the maximum cars on site 17 (including the 3 office staff).

Office staff (Admin, management, safety, etc.) will typically work an 8-hour day starting from 6am to 9 am and ending from 2pm to 5pm.

f) Can it be clarified if there are any truck movements proposed during the 3rd shift (i.e. between 9pm to 6am)? Page 90 of the EIS alludes to one truck/2 movements.

The 3rd shift is indicated as 9pm to 4am (refer to page 51 of the EIS) and it is proposed that there will be truck movements during this time. These movements do not occur during peak periods and therefore were not specifically outlined in the EIS. Chart 2 on page 16 of the Traffic assessment shows that, on average, the estimated truck movements would be 6 (3 trucks in, 3 trucks out) for the period of 9pm to 6am.

Page 90 of the EIS states that there will be "2 truck movements (1 in, 1 out) during the weekday PM network peak – no change." This is not in the 3rd shift, this is in the afternoon, and identifies that truck movements will not affect the afternoon peak period on local roads.

g) Staffing numbers must be confirmed during all days and shifts. Table 3.5 details a shift will comprise 14 people for the MRF but 2 will be onsite for TRF operations but the table also lists 3 office staff. Therefore, a total of 19 staff for Shifts 1 and 2. Is this correct?

No, there are 3 scenarios:

1. If the site is running any MRF operations for a shift, that shift will require 14 staff.
2. If the site is not running MRF operations for any shift (1 or 2), but is running TRF operations, it will require only 2 staff.
3. If the site is performing TRF operations concurrently with MRF operations, there is no requirement for any additional staff on site. The 14 for the MRF are sufficient to absorb the TRF workload as part of their day. The TRF tasks during MRF operation involves using the front end loader to load trucks with loose material, rather than loading the main feed conveyor and then loading a bulk haul truck with baled, finished material. One operator can perform TRF loading rather than MRF loading.

In addition to the above, regardless of the operation of the site, we have allowed for 3 office staff to be present from 6am to 5pm Mon-Fri. At any one time, there will be a maximum of 17 regular staff on site.

h) Confirmation is needed for office staffing during Shift 3, weekend and public holidays. Is it correct to assume that there will be office staff permanently onsite during all shifts? If so, how many office staff will be onsite?

No, there is no need for office staff to be present outside of the stated hours of 6am – 5pm Mon-Fri. Supervisory staff for the shifts have been included in the Staff count for the Operational Shifts 1, 2 & 3.

i) Table 3.3 sets out waste stream material limits being stored onsite. The EIS details the EPL limits a maximum 1500t of material being stored onsite at any one time "however within that limit there is flexibility between the various materials with individual limits...". Table 3.3 then details 2350t of material being potential stored onsite as part of a 'flexible' approach. Is it correct to assume that a maximum 2350t can be stored onsite at any one time? Can it be explained how a 'flexible' approach is used to depart from the EPL?

There will be no more than 1,500 tonnes stored on site at any one time. Although it is predictable when assessed across a long period of time, the make-up of the loose commingled recycling being delivered to site varies day-to-day. This means that we must set and maintain safe maximum levels of each stream of material being stored on site.

Consequently, the site will theoretically have space available to safely store a total of 2,350 tonnes of varying materials. However, Visy will, as a matter of both regulatory compliance and safety, comply with its EPA licence requirements and will not store more than 1,500 tonnes on site at any one time. This 1500 t limit is not 'flexible'.

To use a simple example, if your basket is limited to holding 10 pieces of fruit and your grocer has 8 apples and 6 oranges, the maximum amount of fruit you can carry in your basket is still 10, it's not 14. It can be 6 oranges and 4 apples or it can be 2 oranges and 8 apples, but if you want to take 8 apples and 6 oranges so the grocer is out of fruit, you need to move some to a new basket, or come back to get some more tomorrow.

j) Table 6.9 lists a number of scenarios in column 1 but does not detail the time period of when the activities (i.e. morning shoulder/daytime and evening, night time and night (sleep disturbance) are undertaken. Additional details must be provided, particularly the time period for 'night (sleep disturbance).

The morning shoulder is from 5am to 7am. The daytime and evening are from 7am to 10pm and the night period is between 10:00pm and 5:00am. The sleep disturbance scenario includes short duration activities with a high level of noise that may cause disturbance to sleep if they occur at night.

k) Table 6.9 details that 'Visy Machinery' continually operates. Details must be provided regarding what this machinery will be operating. Further, has the acoustic impact assessment report considered the potential noise impacts?

The table details that "Visy Machinery" "Operates continuously" during the "Morning shoulder/daytime and evening" scenario. This means that the machinery itself will be operating; it will be running, sorting and processing recyclable material. 'Machinery' in this context refers to the MRF sorting plant machinery consisting of conveyors, sorting machines and baling machines.

The acoustic engineering consultants have modelled the operation of Visy machinery during the Morning shoulder/daytime and evening" and included the results in their report at Appendix G in the EIS.

l) Page 96 of the EIS details 'the model assumes all roller doors to be open between 5am to 8pm'. How do open doors between 5am to 6am impact sensitive uses given that an aim of the Industrial Noise Policy is to minimise impacts to sensitive uses between 10pm-6am, daily? What will be the impact if a condition was imposed requiring the roller door to be closed until 6am?

The impact will be that the site will not be able to receive recyclable material from council trucks until 6am. This would prevent Council collection trucks from starting their pick-up runs before 5am and causing them to return to collect their second load of bins from 7 or 8am, depending on the distance of the collection area from the site. This would also prevent trucks from being able to pick-up material from the Visy site prior to 6am, increasing site congestion, further prolonging collection truck's time on site and extending drivers' working hours. The impact is more recycling trucks on the roads after 1 pm during the afternoon peak periods.

m) Regarding cleaning of the facility and hours for cleaning, please confirm what 'cleaning' activities covers and refers to. Page 51, Table 3.5 has a cleaning period nominated for the start and end of Shift 1, start of Shift 2 and nothing for Shift 3. Can this be clarified? It appears unusual for the facility to be cleaned at the end of Shift 1 and again at the end of Shift 2 but nothing proposed at the end of Shift 3.

The time indicated as 'cleaning' is dedicated maintenance cleaning time, during which the maintenance team and some other staff are retained to pick up material in the areas where it has spilled from the sorting plant or to remove material from parts of machinery where it accumulates. It can also involve washing the mobile equipment or changing tie wire in the balers or any normal housekeeping work that is not normal production operation of the plant.

Of course, general cleaning also occurs while the plant is running or during unscheduled stops or maintenance breaks. The end of shift three is the start of shift 1 or close to the start of the Saturday shift, and the sorting plant may be stopped early, especially on a Friday to ready it for the weekend.

3. SSPP Questions

a) At the 'kick off' meeting, the Panel asked a number of questions to be clarified. Comments must be provided to their issues when responding to the above. The meeting minutes can be sourced through the SSPP website.

The meeting minutes identify several key issues for consideration. No questions (other than identified issues) were set out in the minutes. Comments on those matters are set out below:

1. Increase in hours of operation to 24 hours Mon-Fri and 6am – 4pm weekends and public holidays. Current approved operating hours to be identified.

   Response:
   The 2001 consent (DA #11268 dated 22 February 2001 does not include any consent condition restricting hours of operation. However, the development is to be carried out substantially in accordance with documents provided supporting that application. The Statement of Environmental Effects by Benbow and Associates dated 6 December 2000 Ref 10124SEE) identified hours of operation of the MRF under normal conditions to be Monday to Friday 6am to 10pm with a clean up period of approximately 4 hours at the end of each day and the possibility of other maintenance work. The request was therefore for 24 hours per day seven days per week operation. The extract from the SEE is below:

   2.3.2 Hours of Operation

   The operation of the MRF under normal conditions will be from Monday to Friday 6am to 10pm. The objective will be to sort all material received in a single day. There will then be a clean up period of approximately 4 hours at the end of each day. There may also be a requirement to maintain the equipment during other periods of the week. Therefore, the development application seeks approval for operations 24 hours per day seven days per week.

   There is nothing in the Council report which indicates that 24 hours not to be approved (Appendix B). Therefore, the approved hours of operation are 24 hours 7 days a week. The requested hours of operation are therefore less than those currently approved.

2. Increase in traffic movements (4 additional truck movements during peak periods)

   Response:
   The traffic assessment has taken into account the additional 4 truck movements per day during peak periods– 2 in and 2 out – being one additional vehicle every 15 minutes during peak hour. As stated in the traffic report, this is a negligible increase during a weekday peak period and no external road improvements were considered necessary.

3. Flood prone land along western boundary (along Alexandria Ave) requires flood evacuation plan. Concrete bunding for flood retention already in place.

   Response:
   Flooding for the site was comprehensively considered in DA19/0921. Bunding was installed to ensure the retention of fire water as part of the works to rectify the fire damage. It has been installed to a height above the probable maximum flood. Flood management measures including

storage of hazardous items on a pallet and a flood evacuation plan in the site's OEMP have been set out, with the flood evacuation plan contained in Appendix J of the EIS.

4. Noise mitigation of operational noise out of normal operating hours (10pm-5am).

   Response:
   An Acoustic report was provided as part of the EIS. Noise control measures were provided in section 6.1 of the report during the operation of the site. In essence the two roller doors on the south side must be shut during night period and the front end loader should only operate inside the warehouse (not outside) during this night time period. Section 6.1 states:

   The following noise management controls are to be implemented during the operation of the site:
   - *The MRF plant can operate during all periods (day, evening, and night)*
   - *The two roller doors located on the south side, close to the eastern wall, are to be shut during night-time (i.e., 10:00 pm to 5:00 am) operation when access to the eastern door is not required.*
   - *Front end loader should only operate inside the warehouse (not outside the warehouse) during night-time (i.e., 10.00pm and 5.00am).*

5. Air quality to be confirmed by Council.

   Response:
   Council has asked for further clarification at the start of the RFI which is to be considered by the consultant.

6. Fire engineering requirements to be confirmed by Council.

   Response:
   Fire engineering matters were also canvassed wholly for the purposes of DA19/0921. A fire safety assessment was however conducted by Mobius for this EIS (Appendix I of the EIS), which set out the base building deviations from the deemed to satisfy provisions which were addressed during the earlier DA. No further fire requirements were considered necessary because the additional throughput arises from an additional shift rather than increased stockpiles.

7. Confirmation from Council that the facility cannot be used for putrescible waste, only recyclables

   Response:
   Visy is only seeking to use the site as a transfer station and/or MRF for recyclable materials. All transfer stations and MRFs do collect some materials which are unacceptable as recyclable materials. Section 3.9 of the EIS discusses such items which are subject to contamination audits and removed.

b) For your information regarding hours of operation, I have reviewed the 2001 application and the EIS proposed hours of operation between 6am to 10pm, Monday to Friday and only limited to the operation of the MRF, with clean up periods of 4 hours at the end of each day. The EIS also requested 24 hours per day seven days a week for equipment maintenance. I was unable to find any details regarding the operation or proposal to have any TRF activities onsite. If you have any additional information, please provide the details.

Re hours of operation see the comments under 3(a)(1) above.

Regarding use of the site as a transfer station, condition 8 of the 2001 consent states as follows:
"For an interim period of a maximum of six (6) months, the subject site may be used as a transfer station while the Materials Recycling Facility is being constructed. All conditions of this development consent apply to the operation of site as a transfer station."

The Council report from 2001 indicates that the use as a transfer station in this interim period was until the materials recycling facility was constructed.

However, this EIS is for a fresh DA – it is not seeking to modify the 2001 consent. Consideration of the site as a transfer station alone, a MRF alone, or a combination of the two has been made within the EIS.

Regards

Stuart Wilmot
Director

APPENDIX A – SHOWER FACILITIES

APPENDIX B – COUNCIL REPORT