5. ISSUE IDENTIFICATION AND PRIORITISATION

This section provides a summary of the key issues identified for assessment based on the Director General's Requirements and the consultation process and presents a risk assessment of the key issues for further assessment.

5.1 CONSULTATION

A consultation programme has been undertaken during the course of preparation of this EA. Bodies consulted included government departments and authorities, neighbouring landholders and representatives of the local community. Consultation was initiated with the DoP, now the Department of Planning and Infrastructure (DoPI), for the purpose of making an application to the Minister for Planning to approve of the development consent for the proposed development being treated as an approval for the purposes of Section 75W of the *EP&A Act* and to request the issue of Director-General's Requirements for the proposed development. A Planning Focus Meeting was held by the DoP on site on 18 March, 2010. The DoP issued Director-General's Requirements in respect of the environmental assessment of the proposed development on 28 April 2010. Revised requirements were issued on 5 August 2010. Table 5.1 presents a listing of the Requirements and references the section in this EA and if appropriate the Technical Report where the issue is addressed. As indicated in Table 5.1, the Director-General's Requirements stipulated that consultation must be undertaken with a number of government departments and authorities. The issues raised are included in Table 5.2.

The Director General's Requirements also stipulated that consultation be undertaken with community groups and affected landholders. Parramatta City Council included specific requirements for community and stakeholder consultation. Section 5.2 describes the approach undertaken to community consultation, the process undertaken and a summary of the outcomes.

5.2 COMMUNITY CONSULTATION

5.2.1 Background

Twyford Consulting were engaged by REMONDIS to develop the consultation programme for the project and to facilitate its implementation.

The key objective was to engage the community and stakeholders proactively, so that they find out early and directly what is being considered before exhibition of the EA and the assessment of the development application by DoPI.

It was intended that key stakeholders be involved during the process to the maximum extent possible so that they understand all the issues being considered, and have an opportunity to contribute to the assessments as appropriate, prior to any decision being made.

The key elements were:

- Confirm and clarify the interested stakeholders- Council, business, community;
- Identify and communicate initially to key stakeholders about the project, the approvals process and the opportunity to participate;
- Brief key stakeholder groups as appropriate (eg Camellia business group, local businesses, resident groups);

Table 5.1
Director General's Requirements

Application Number	**10_0028**	**Response in EA**
Project	REMONDIS Integrated Recycling Project , which includes development of: • Commercial and industrial alternative waste treatment facility with a capacity to process up to 100,000 tonnes of C&I waste per annum; • Tunnel composting facility with a capacity to process up to 50,000 tonnes of source separated food and green waste per annum; and • Ancillary infrastructure (ie weighbridge, administrative offices, truck depot, parking and workshops)	
Location	**1 Grand Avenue Camellia, Part Lot 1** **DP 226202, Lot 1 DP 5797365, Part Lot 2 DP 579735, Parramatta LGA**	
Proponent	REMONDIS Pty Ltd	
Date of Issue	April 2010	
General Requirements	The Environmental Assessment of the project must include:	
	• An executive summary	Executive Summary
	• A detailed description of the following: o Waste strategy (or strategies) that underpins the development of the project; o The past, existing and approved operations/activities on the site including existing environmental management and monitoring regime; o Existing and approved operations/facilities, including any the statutory approvals that apply to these operations and facilities; and o The existing environmental management and monitoring regime on site.	Sections 1, 2 and 4
	• A detailed description of the project including the: o Need for the project having particular regard to the NSW Waste Avoidance and Resource Recovery Strategy 2007, DECC's Guidelines for Solid Waste Landfills and Composting and Related Organics Processing Facilities; o Alternatives considered, including a justification for the	Sections 2 and 4

Application Number	10_0028	Response in EA
	proposed facility on economic, social and environmental grounds; o Likely staging of the project; and o Plans for any proposed building works.	
	• A risk assessment of the potential environmental impacts of the project, identifying the key issues for further assessment.	Sections 5 and 7
	• A detailed assessment of key issues specified below, and any other significant issues identified in the risk assessment (see above) , which includes: o A description of the existing environment using sufficient baseline data; o An assessment of the potential impacts of all stages of the project, including any cumulative impacts, taking into consideration any statutory provisions, technical or policy guidelines; and o A description of the measures that would be implemented to avoid, minimize, mitigate, rehabilitate/remediate, monitor and if necessary, offset the potential impacts of the project including detailed contingency plans for managing any significant risks to the environment.	Sections 6, 7 and 8
	• A statement of commitments, outlining the proposed environmental management and monitoring measures.	Section 8
	• A conclusion justifying the project on economic, social and environmental grounds, taking into consideration whether the project is consistent with the objects of the *Environmental Planning & Assessment Act 1979*.	Section 9
	• A signed statement from the author of the Environmental Assessment.	Certification Statement
Key Issues	• Waste Management – including: o Identify, classify and quantify the likely waste streams that would be handled/stored/disposed of at the facility; o Describe how this waste would be stored and handled on site, and transported to and from the site; o Describe the AWT technology and outputs and the quality control measures that would be implemented; and o Detail the potential impacts associated with treating, storing, using and disposing of this waste and waste product.	Section 4

Application Number	10_0028	Response in EA
	• Contamination – including: o Characterisation of the nature and extent of contaminated material on site; o Details of remediation that has occurred to date and associated management measures and plans; o Impacts of the project on the integrity of the existing capping layer; o A revised Remedial Action Plan, including management measures and a site validation plan; and o Detailed measures addressing the disposal of any contaminated material disturbed during construction.	Section 3 , Technical Report No 1 and Appendices C, D & E
	• Air Quality and Odour – including a quantitative assessment of potential air quality and odour impacts of the project on surrounding land owners.	Section 7.5 and Technical Report No 4
	• Greenhouse Gas – including: o A quantitative assessment of the potential scope 1, 2 and 3 greenhouse gas emissions of the project, and a qualitative assessment of the potential impacts of these emissions on the environment; and o A detailed description of the measures that would be implemented on site to ensure that the project is energy efficient.	Section 7.12 and Technical Report No 4
	• Traffic and Transport – including: o A detailed traffic impact study of the project on safety and performance of the surrounding road network (including impact on the nearby intersection of James Ruse Drive/Grand Avenue and the intersection of the site access road with Grand Avenue) and a description of the measures that would be implemented to upgrade and/or maintain the network over time; o A level crossing risk assessment prepared in consultation with RailCorp, council and the RTA; o An assessment of the potential parking demand of the project; and o Detailed plans of the proposed layout of the internal road network and parking on site in accordance with the relevant Australian standards.	Sections 7. 8 and 7.11 and Technical Report No 6 and No 7

Application Number	10_0028	Response in EA
	• Soil & Water including: o A detailed water balance for the project outlining the measures that would be implemented to minimize the use of water on site; o Wastewater predictions, and the measures that would be implemented to treat, reuse and/or dispose of this water; o The proposed erosion and sediment controls during construction; o Proposed stormwater management system ; o And consideration of the potential salinity, contamination, flooding and acid sulfate soil impacts of the project.	Section 4 and Sections 7.1 to 7.3
	• Noise including: o Construction, operation and traffic noise.	Section 7.6 and Technical Report No 5
	• Hazards including: o A Preliminary Hazard Analysis of the project and an assessment of the potential fire risks of the project.	Section 4 and Section 7.11
	• Visual – including o An assessment of the potential visual impacts of the project on amenity of the surrounding area; o A detailed description of the measures that would be implemented to minimize the visual impacts of the project, including the design features, landscaping and measures to minimize the lighting and signage impacts of the project.	Section 7.7 and Technical Report No 8
Other Issues	• Heritage – including o Potential Aboriginal and non-aboriginal heritage impacts of the project.	Section 7.10 and Technical Report No 11
	• Socio-Economic – including: o Comprehensive assessment of the economic and social impacts of the project, demonstrating that if would have a net benefit for the community, paying particular attention to the potential impacts of the project on waste minimisation and resource recovery in the region.	Section 7.9 and Technical Report Nos 9 and 10
References	• List provided.	Section 10
Consultation	During the preparation of the Environmental Assessment, you should consult with the relevant local, State and Commonwealth Government Authorities, service providers, community groups or affected landholders/	Section 5 and Appendix B

Application Number	10_0028	Response in EA
	In particular you must consult with the: • Department of Environment, Climate Change and Water; • NSW Department of Water; • Roads and Traffic Authority; • RailCorp; and • Parramatta Council. The consultation process, and the issues raised during this process, must be described in the EA.	

Table 5.2
Agency Issues

AGENCY	Comment	Response
DECCW (now OEH)	Waste Management	Section 4
	Stormwater and Wastewater Management	Section 4
	Odour Management	Section 4 and Technical Report No 4
	Dust Management	Section 4 and Technical Report No 4
	Noise	Section 4 and Technical Report No 5
	AWT Design including leachate management, gas management and environmental monitoring	Sections 4,6 and 8
	Contaminated Site Requirements	Section 3, Technical Report No 1 and Appendices C, D & E
	Quality and use of final output products	Section 4

	Environmental Assessment Requirements including:
	• Executive Summary
	• The Proposal
	  ○ Objectives
	  ○ Description of Proposal
	  ○ Rehabilitation
	  ○ Alternatives and Justification
	• The Location
	  ○ Exact location of dwellings, schools, shopping centres, childcare centres and hospitals
	• Identification and Prioritisation of Issues
	• Environmental Issues
	  ○ Air
	  ○ Noise and Vibration
	  ○ Water
	  ○ Soils and Contamination
	  ○ Waste and chemicals
	  ○ Cumulative impacts
	  ○ Impacts on threatened species, population, ecological communities and their habitat
	  ○ Impacts on Aboriginal cultural heritage values
	• Compilation of Mitigation Measures
		
		Executive Summary
		Section 4
		
		Sections 3 and 7
		Technical Report No 10
		
		Section 7
		Sections 4 and 7
		Technical Reports Nos 1 to 11
		
		Sections 6 and 8

AGENCY	Comment	Response

	• Justification of the Proposal
	• Site specific requirements for the proposed AWT facility
	  ○ General
	  ○ Construction
	  ○ Contaminated site issues
	  ○ C&I Resource Recovery facility
	  ○ SSOR Resource Recovery Facility
	  ○ Tunnel Hallways
	• References
		Section 9
		Section 4
		
		Section 10

Parramatta Council	• Community and Stakeholder Consultation
	  ○ Utilise a variety of engagement techniques
	  ○ Identify community and stakeholder groups
	  ○ Identify how issues raised are to be addressed
		Sections 1 and 5
		Appendix B

	• Developer Contributions ○ Need to address the payment of developer contributions or any commitment to commence negotiations with PCC for a Voluntary Planning Agreement	Section 2.3.6

	• Traffic
	  ○ Comprehensive traffic report required that analyses the impacts of the proposed facility on the already compromised intersection of James Ruse Drive and Grand avenue
	  ○ Address how trucks will leave the site (ie right turn on to Grand Avenue) without impacting on traffic flows and impacting on driver safety
	  ○ Need to address adequacy of existing vehicular crossing over the railway line (on Grand Avenue) to cater for the additional traffic in peak and non-peak periods
		Section 7.8 and Technical Report No 6

	• Draft Parramatta LEP 2010 ○ Need to address draft planning controls of Draft Parramatta LEP 2010 and associated draft DCP	Section 2

DoP Regional Team
(now DoPI)
	• Current Controls
	  ○ Parramatta LEP 2001 Current zoning is Employment – Zone 4
	  ○ Development is permissible with consent
	• SREP
	  ○ SREP 28 – Development is permissible with consent
	  ○ SREP (Sydney Harbour Catchment) – Site is located on land within the Sydney Harbour Catchment Foreshores & Waterway area
	• Future Controls
	  ○ Draft Principal LEP – proposed zoning is IN3 – Heavy Industrial
		Section 2

AGENCY	Comment	Response
	○ The proposal is not expected to be inconsistent with future zoning • Proposal for Adjacent site ○ Proposal is in close proximity to a site which has a Major Project and LEP amendment requests • Metropolitan and draft West Central Sub regional Strategies ○ Draft strategy identifies the area of the proposed development as located within Category 1 – Land to be retained for industrial purposes ○ Proposed development is generally consistent with the strategies outlines in the draft West Central SRS and Metropolitan Strategy as it will create jobs	
RTA	• Development needs to take account NSW State Plan and draft West Central Sub regional Strategy and the need to address the supply of transport services and measures to manage demand for car use. • Daily and peak traffic movements to be generated by the proposal including the impact on nearby intersections and the need /associated funding for upgrading or road improvement works if required. Key intersections to be examined/modeled include: ○ James Ruse Drive/Grand Avenue • Details of proposed access and the parking provision associated with the proposed development including the requirements of relevant Australian Standards • Proposed number of car parking spaces and compliance with the appropriate parking codes • Details of service vehicle movements (including vehicle type and likely arrival and departure times) • Traffic Management plan for all demolition/construction activities dealing with vehicle routes, number of trucks, hours of operation, access arrangement and traffic control measures.	Section 7.8 and Technical Report No 6
NOW	• Protection and Enhancement of Riparian Land	Sections 4.18 and 7.4 and Technical Report No 3
	• Surface Water and Groundwater	Sections 7.1 to 7.3 and Technical Report Nos 1 and 2
RAIL CORP	• Risk Assessment	Section 7 and Technical Report No 7

- Establish a small study group of representative stakeholders to work with project team during the assessment process to understand and contribute to the studies that make up the assessment and to act as a two way communications conduit to the broader stakeholders;

- Provide opportunities for local stakeholders to review the proposal, discuss with project team and provide comment; and

- Regular written communication to stakeholders as approvals process proceeds.

A meeting was held with officers of Parramatta Council on 7 July 2010 prior to commencment of the programme. The objectives of the meeting were to:

- Understand Council's requirements regarding engaging with the local community and the approvals process;

- Review the initial stakeholder list and identify appropriate contacts;

- Understand appropriate communication processes for Councillors and council staff;

- Confirm the suitability of the above approach in this situation; and

- Identify appropriate engagement techniques.

5.2.2 Outcomes

Stake Holder Identification

Research identified the most likely affected stakeholders as neighbouring businesses, including tenants in an adjacent office building, other businesses located along Grand Avenue and the Sydney Turf Club at Rosehill Racecourse. Others potentially interested or affected were businesses along James Ruse Drive, and residents to the west of James Ruse Drive and businesses and residents to the north across the Parramatta River.

The Camellia Business Group - a group representing the major businesses in Camellia industrial area - was also identified as potentially interested. This group has been active previously on major issues like traffic flow, but had not been active during 2010 and were not able to be used as an information conduit.

The broader Parramatta community were also identified as likely to be interested in the project.

Information Dissemination and Input

A letter was initially hand delivered to all the neighbouring businesses along Grand Avenue (approx 500m radius, including all tenants in the adjacent Tilrox/Aldi building), outlining the project, providing an opportunity for input and questions by meeting, email, phone or fax, as well as an invitation to participate in the study group process.

An initial meeting was held with the Director/Owner of the Child Care business (a major tenant in the Tilrox/Aldi building that overlooks the proposed development site). There was a high degree of concern expressed by the business owner about a range of issues regarding the development that the owner considered might adversely impact the business. The owner was invited to attend the study group to provide input to the issues to be considered during the assessment process.

Study Group Process

A couple of the Tilrox/Aldi building tenants, as well as the building owner, accepted the invitation to participate. There were no responses from any of the other neighbouring businesses.

To broaden the representation to include residents' views, invitations were sent to a group of residents representing the closest areas to the site. This tapped into Parramatta Councils community panel – i.e. residents who had expressed interest in assisting Council consider issues that might impact the area. Two residents accepted the invitation and were able to contribute to the process.

Meetings

Two meetings of the group were held over a 2 month period (Aug/Sept). Prior to each meeting, the participants were sent an agenda and information on progress of the assessment studies being undertaken. Meeting minutes are included in Appendix B.

At each meeting, the environmental studies were considered and input sought as to what issues they needed to address. Updates were also provided on what the studies had identified and how these findings were being addressed in the project design. The group also added to the key question list that they had about the project.

Meeting attendance was low, due to the difficulty in finding a time that suited all the participants. To mitigate that, participants were kept in the loop regarding meeting discussions and outcomes by additional communication, with input added outside each face to face meeting.

Issue Identification

The group identified and discussed a range of key issues, which they considered needed to be addressed as part of the assessment and approvals process. The key issues raised and discussed by the group included:

- Traffic impact on the local roads, and access to the Tilrox/Aldi building. This involved both traffic congestion and safety issues around truck access to the proposed site;
- Reduction in air quality due to emissions from the plant – i.e. the likelihood of odour affecting local businesses and residents;
- The use of the site which had been previously contaminated by asbestos. There was a good understanding about the contamination and the concerns centred on how construction at the site could be managed to eliminate any health concerns;
- The visual impact of the proposed facility as changing the current landscape;
- The potential for plant breakdown or accident during operation impacting on neighbours and broader community;
- The noise impact of plant operation and truck movements, especially on the tenants of the Tilrox/Aldi building, particularly the children attending the Child Care Centre;
- Health concerns associated with waste operations - e.g. vermin, birds, rubbish overspill, poor air quality, etc;
- Adverse impact on the commercial viability of the neighbouring businesses, as well as potential impact on residential land values; and

- The location of a waste recycling facility in close proximity to commercial premises and shops.

Information Sheet / Newsletter

To communicate more fully about the project, an information sheet / Newsletter was prepared and distributed to the same group of neighbouring businesses in December 2010 (refer Appendix B). To ensure that the information sheet would present the relevant information, the study group members provided input on the format and content they believed would best communicate effectively to the affected stakeholders. The key elements suggested included a photo, emphasising the key issues identified, explaining the enclosed nature of the plant and how it was intended to operate, and how the assessment and approvals process would proceed, with a link to the frequently asked questions. The information sheet was then drafted and comment sought from group members, before being finalised and distributed by hand to each business.

A range of likely questions that stakeholders have about the project were collected during all the meetings and contact with stakeholders. These have been collated into a list with responses and posted on the REMONDIS website, and made available as requested (refer Appendix B).

Council Involvement

REMONDIS met with Council staff in July 2010, to identify their needs regarding engagement, in terms of interested and affected stakeholders and their expectations. Council staff have been provided with regular informal updates, as well as utilising their resident panel to source some representative community members for the study process. In December, Council staff and Councillors were provided with the information sheet, the frequently asked questions and a letter outlining the engagement to date and the proposed next steps (refer Appendix B).

Summary

The engagement process to date has been focused on involving the adjacent and neighbouring businesses during the preparation of the EA, in identifying the issues they see associated with the proposed development, to provide an opportunity to input, and to build understanding of the proposal and the proposed actions to mitigate any impact on the local businesses.

Key findings to date include:

- Based on the response from those contacted, the level of interest and concern from most local businesses regarding the proposal would appear to be low. There was almost universal agreement that the development could likely exacerbate the traffic congestion along Grand Avenue, particularly on the bridge over the railway to James Ruse Drive. There was also a general acceptance about that as being an unavoidable consequence of being located in a commercial and industrial precinct;

- The owner of the Child Care Centre in the adjoining Tilrox/Aldi building has expressed strong opposition to the proposed development. The owner has withdrawn currently from any contact regarding the proposal. The owner did indicate that one of the reasons for withdrawal was that participation in the engagement activities was perceived by them as “agreement” or at least pressure to agree. This may have implications for the next steps in engagement to ensure that community stakeholders are able to participate and contribute appropriately while still able to hold their position on the development; and

- Some feedback, both during the study group meetings and anecdotally in talking to local businesses indicate that most make assumptions on the likely impact of a waste facility based on their prior experience with other facilities in the Sydney region e.g. Eastern Creek (there is also a waste facility about 1 km further east along Grand Parade).

5.3 PLANNING REQUIREMENTS

As described in Section 2.3.2 and 2.3.4 two planning instruments apply specifically to the site. These are:

- SREP No 28 – Parramatta; and

- Draft Parramatta LEP.

The objectives of SREP No 28 in relation to the Regional Enterprise Zone are summarised in Table 5.3 and references the sections in this EA where the objective is addressed. The objectives in relation to the Environment Protection Zone adjacent to the Parramatta River are similarly summarised in Table 5.4.

Table 5.3
SREP No 28 Objectives – Regional Enterprise Zone

Objective	Response in EA
Achieve a regional eco-industrial estate	Complies
Allow a wide range of industrial and heavy industrial uses	Complies
Protection of amenity and views and contribution to visual quality	Section 7.7
Efficient operation of the road system	Section 7.8
Application of current environmental management best practice	Section 6
Allow for future potential public access along the River	The proposed development does not impact on the zone and does not limit future potential public access (refer Section 4.18)

Table 5.4
SREP No 28 Objectives – Environment Protection Zone

Objective	Response in EA
Conserve, manage and enhance biodiversity	Section 7.4 and Technical Report No 3
Protect and restore sensitive remnant habitats and communities	Not Applicable
Increase community awareness of remnant habitats and biodiversity	Not Applicable
Protect and restore values of bushland	Not Applicable
Allow uses for scientific and educational purposes	The proposed development does not impact on the zone and does not restrict use for scientific and educational purposes

The objectives of the Draft LEP in relation to the Heavy Industrial zoning are summarised in Table 5.5 and the sections of this EA addressing these objectives are referenced.

Table 5.5
Draft LEP Objectives – Heavy Industrial Zone

Objective	Response in EA
Provide areas for industries that need to be separated from other land uses	Not Applicable
Encourage employment opportunities	Section 7.9
Minimise adverse effects of heavy industrial on other land uses	Sections 7.5 – 7.8
Allow a wide range of industrial and heavy industrial uses	Complies
Ensure future potential foreshore access	The proposal does not impact on foreshore access (refer Section 4.18)

The objectives of the Draft LEP in relation to the area along the riverbank covered by Clause 6.9 Environment Protection of the draft LEP are similarly summarised in Table 5.6.

Table 5.6
Draft LEP Objectives – Environment Protection

Objective	Response in EA
Protect water quality	Section 7.2
Protect natural flows to the River	Section 7.2
Protect stability of the bed and banks of the River	Section 7.2
Protect the hydrological and biological functions of the River and adjacent land and wetlands	Sections 7.2 & 7.4
Protect diversity, native flora and fauna and their habitats	Not Applicable

5.4 KEY ISSUES

The key issues identified in the Director-General's Requirements, the relevant planning instruments and resulting from the consultation process have been identified as:

- Waste Management including:
  - Identification of waste streams;
  - Storage, handling, treatment and transportation of waste; and
  - Associated potential environmental impacts.
- Site Contamination including:
  - Site history;
  - Impacts of construction on the site capping; and
  - Revised Remedial Action Plan and the disposal of any contaminated material arising from construction.
- Air Quality including:
  - Assessment of dust and odour emissions on surrounding land owners and occupiers; and
  - Greenhouse gas assessment.

- Traffic and Transport including:

    - Traffic impact study of surrounding road network;
    - Safety of existing car park users;
    - Rail/road interface assessment; and
    - Proposed measures to upgrade/maintain road network.

- Soil and Water including:

    - Project water balance;
    - Flooding;
    - Stormwater management; and
    - Construction controls.

- Construction and Operational Noise;

- Parramatta River including:

    - Landscape and biodiversity enhancements in the area along the river bank (in particular the Environment Protection Zone);
    - Protection of water quality;
    - Protection of natural flows to the river; and
    - Protection of stability of the river banks and wetlands.

- Visual Impact and Landscape Planning; and

- Socio-economic assessment including possible impact on neighbouring businesses.

These issues are addressed in Section 7 of the EA.

5.5 GENERAL ENVIRONMENTAL RISK ANALYSIS

Table 5.7 provides a general environmental risk analysis relating to the proposed development. The Site Works Plan for the extension of services and disturbance to the cap and contaminated materials presents a detailed risk assessment.

Table 5.7
General Environmental Risk Analysis

Issue	Potential Impacts	Comments
Land Use	Compliance with objectives of planning instruments	Proposed development complies with relevant objectives (Section 2.3).
	Use of contaminated land	Effective use of contaminated land. Minimal disturbance to cap and contamination. Installation of site services undertaken in accordance with SWP based on approved SMP (refer Section 4.3)
	Conflict with adjacent land uses	Proposed development is in accordance with zoning and does not impact on adjacent land uses (Sections 7.5-7.8).
Topography and Geology	Excavation of contaminated material	Material from installation of services excavated and disposed in accordance with the Site Works Plan based on approved SMP (Section 7.1).
	Increased height of platform beneath building	Platform heights to prevent unnecessary breach of cap and contaminated material. Maximum increased height 1.5m. No impact on land stability

Issue	Potential Impacts	Comments
		(Section 7.1).
Flooding	Effect of flooding on facility	Flood assessment indicates no impact of flooding on buildings (Section 7.2). Operations will cease during flooding events.
	Effect of structures on flooding of adjacent land.	Flood assessment indicates no effect on flood heights on adjacent land (Section 7.2).
Soils	Disturbance to soils and contaminated materials	Minimal disturbance to cap and contaminated material undertaken in accordance with the SWP (Section 4.3).
	Subsidence due to construction of platform and facility	Geotechnical assessment and building design include mitigation measures (Sections 4.1 to 4.3)
	Deposition of fill materials for platform	Surface water to be diverted around fill area and sediment control works in place (Section 7.2).
Water	Effect of excavation on surface water	Stormwater to be diverted around excavation in accordance with SWP (Section 7.2).
	Effect of construction of platform on surface water	Stormwater to be diverted around fill area and sediment control works in place (Section 7.2).
	Effect of leachate on surface and groundwater	Leachate from the waste processing is totally contained by a concrete surface and diverted to storage tanks for reuse/disposal off site.
	Contamination of surface water through erosion/sediment movement and contact with contaminated material	Only exposure is during construction phase. Excavation and exposure of contaminated material will be controlled in accordance with the SWPs. External stormwater will be diverted away from fill areas during platform construction. Sediment and erosion control measures will be in place (Sections 4.3, 7.1 and 7.2).
Odour	Effect of odour emission from plant on nearby land uses and amenity	Air quality modelling shows that no odours will be detected outside the property boundary. Safeguards are incorporated in the plant and biofilter design to ensure no odour escape in the event of a malfunction (Sections 4 and 7.5).
	Effect of odour emissions from delivery trucks on adjacent land uses	All vehicles transporting waste to the site and product from the site will be sealed. Trucks will be inspected for leaks at the weighbridge and in the plant (Sections 4 and 6).
Dust	Effect of dust from deliveries and operations on adjacent land uses	The site is sealed and will be kept clean. There will be minimal dust from truck movements. No dust will be emitted from operations as all air will pass through the biofilters (Section 7.5).
Greenhouse Gas Emissions	Impact of greenhouse gas emissions from transport and facility operations	Annual greenhouse gas emissions have been estimated consistent with emissions from landfill disposal (Section 7.12).
Noise	Effect of noise generated by vehicles and equipment operations on adjacent land uses	Noise emissions from construction and operational activities have been predicted to meet the OEH criteria at all receivers including adjacent land uses. Traffic noise increase also complies with the relevant criteria (Section 7.6). In the event of any unexpected noise disturbance, operations will be stopped until the cause is rectified (Section 7.6).
Biodiversity	Effect of site runoff on riverine vegetation	The characteristics of site runoff will not change as a result of construction and operation of the facility (Section 7.4).
Traffic	Impact of vehicle movements to and from the site on the local road network	The traffic study undertaken shows that vehicle movements for both construction and operations phases will have moderate increase in on-street peak periods and delays at surrounding intersections will remain relatively unchanged.

Issue	Potential Impacts	Comments
		Site traffic will be redistributed to less congested intersections if required (Section 7.8).
	Impact of vehicle movements on local parking and drop-offs	RailCorp, Billbergia and Council are addressing existing safety issues as a result of an earlier study (refer Section 7.11 and Technical Report No 7.
	Impact of truck deliveries on rail transport operations	Existing use of the rail siding is minimal with one train per day using the line however a risk assessment has been undertaken (Section 7.11 and Technical Report No 7).
Visual	Impact on building heights in the context of the SREP and Draft LEP height restrictions	Building heights will be up to 1.5m above the SREP and Draft LEP height restrictions due to the height of the platform. The visual analysis undertaken shows that the buildings meet the objectives of the planning instruments (Section 7.7 and Technical Report No 8).
	Views of the facility and delivery operations from adjacent buildings and land uses	The visual analysis shows the views of the facility from the adjacent building. Landscape planting as proposed along the rail line. Views from other buildings and land uses are blocked by existing structures (Section 7.7 and Technical Report No 8).
	View of facility and operations from viewpoints on and adjacent to the river	Views from the river are restricted by the height of the river bank and low level of the water in the river. Views from other viewpoints are restricted by existing structures and vegetation (Section 7.7 and Technical Report No 8).
	Views of the facility from site entry	The facility will be visible from the site entry (Section 7.7 and Technical Report No 8).
Socio-Economic	Impact of development on local land uses and businesses	Social and economic impact assessments have been undertaken. Potential impacts primarily relate to increased traffic generation (Sections 7.8 and 7.9, Technical Report Nos 6, 9 and 10).
Utilities and Infrastructure	Requirements for power, sewage, water, etc	The facility will be connected to existing services by Billbergia. No additional capacity will be required.
Hazards	Impact of disturbance of the concrete cap of the site on contamination	All disturbance to the cap and contaminated material will be undertaken in accordance with the Site Works Plan which is based on the approved SMP.
	Impact of removal, transport and disposal of contaminated material	As above.
	Hazards associated with facility operations	The hazard analysis undertaken shows that the provisions of SEPP No 33 are not applicable and the operations of the facility are not potentially hazardous or offensive.

5.6 REVIEW OF ADEQUACY

The EA was submitted to the DoPI for a Review of Adequacy. Key issues raised as a result of the review were:

- Contamination - Management of activities during proposed excavation works for site services and stormwater connections needed to be expanded. No excavated site material is to be backfilled on site. SEPP 55 requirements needed to be addressed in the documentation;

- SWP needed to be expanded to include management of other contaminants and additional air/dust monitoring measures;

- Environment Protection Zone – Need to include landscaping works and justify the extent of works proposed. Public access needs to be encouraged within this zone;

- Geotechnical assessment required to demonstrate the capacity of the existing cap to maintain its integrity during construction and operation of the proposed RIRP;

- Need and Justification – Need to consider recent review of WARR Strategy;

- Air Quality – Sensitive receptors needed to be included on maps and justification provided in relation to the biofilter performance;

- Traffic - Further analysis of the intersection of Grand Avenue and Grand Avenue North was required and potential impacts on safety at the site entry including conduct of a road safety audit; and

- Noise - Assessment of temperature inversions needed to be included in the report. Noise sensitive receivers needed to be considered in terms of zoning. Existing industrial noise, sleep disturbance assessment and the traffic noise assessment required revision.

The EA has been finalised to address these issues.