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Anthony Sutton Executive Director Environmental Protection Authority Prime House, 8 Davidson Terrace Joondalup Western Australia 6027

Dear Anthony

RE: NOTICE REQUIRING FURTHER INFORMATION

On behalf of the City of Stirling (the City), Talis Consultants (Talis) provides this response to the Environmental Protection Authority (EPA) request for further information dated 4 May 2021. The following information is provided to allow the EPA to continue to undertake its assessment of the Recycling Centre Balcatta (RCB) Redevelopment (the Project).

1.1 Flora and Vegetation

Please provide additional information in relation to the removal of vegetation within the proposed redevelopment areas, such as how much clearing is required, the type and number of trees proposed to be removed and whether any flora and/or vegetation surveys have been completed.

1.1.1 EPA Policy and Guidance

EPA Factor Environmental Guideline – Flora and Vegetation is the relevant policy and guidance document to this question raised by the EPA.

1.1.2 Receiving Environment

The majority of the site has been historically cleared as shown in Figures 2-5, 8 and 10 (provided as Attachment 1). The remaining vegetation consists of native and introduced species of trees (groups and individuals) with no understory. An Arboricultural Assessment (Attachment 2) was undertaken by Classic Tree Services (CTS) in March 2019 which involved an inspection and survey of all remaining trees within the site boundary. The purpose of the survey was to input into the design of the facility to maximise the retention of very high and high value trees identified within the survey and also assess the transplantation potential for the trees. A variety of species were recorded during the survey and their details are listed in Table 3.3 of the CTS report (Attachment 2). Photographs of each tree surveyed is also provided within the report appendices.



1.1.3 Proposal Activities

The Project design considered the trees species and locations onsite and avoided these where possible. Of the one hundred and ninety seven (197) tree species present on the site, twenty-seven (27) trees will require progressive removal for the Project, comprising 15 jarrah trees, two other native trees and ten non-native trees. The location of these trees is shown in Drawing C-101 (Appendix A of the Environmental Assessment and Management Plan (EAMP) and provided as Attachment 3). The Tree ID, species name, structural condition, retention value and potential for relocation is shown in Table -1.

Tree ID	Name	Origin	Structural Condition	Retention Value	Relocate
38	Eucalyptus gomphocephala	Native	Good	High	No
63	Eucalyptus marginata	Native	Medium -basal wound	High	No
75	Eucalyptus marginata	Native	Medium - Lean	High	No
76	Eucalyptus marginata	Native	Medium – Stem wound	High	No
83	Eucalyptus marginata	Native	Good – Wounds, 3 stem	High	No
86	Melaleuca quinquenervia	Native	Good -multi stem	High	No
95	Ficus microcarpa var. hillii	Native but not to Perth Area	Good	High	Yes
96	Eucalyptus marginata	Native	Medium – Basal damage	High	No
97	Eucalyptus marginata	Native	Good – 3 stem	High	No
112	Washingtonia robusta	Introduced	Good	Medium	Yes
124	Araucaria columnaris	Introduced	Good	Medium	No
126	Phoenix canariensis	Introduced	Good	Medium	Yes
127	Phoenix canariensis	Introduced	Good	Medium	Yes
128	Phoenix canariensis	Introduced	Good	Medium	Yes
129	Phoenix canariensis	Introduced	Good	Medium	Yes
130	Phoenix canariensis	Introduced	Good	Medium	Yes
131	Butia capitata	Introduced	Good	Medium	No
132	Phoenix canariensis	Introduced	Good	Medium	Yes
137	Eucalyptus marginata	Native	M – Basal Wounds	High	No

Table -1: Tree species requiring removal and possible transplantation



Tree ID	Name	Origin	Structural Condition	Retention Value	Relocate
146	Eucalyptus marginata	Native	Good	High	No
147	Eucalyptus marginata	Native	Good – 7 Stem	High	No
150	Eucalyptus marginata	Native	Good	High	No
154	Eucalyptus marginata	Native	Good	High	No
157	Eucalyptus marginata	Native	Medium – 4 Stem	High	No
159	Eucalyptus marginata	Native	Medium – dead stem	High	No
162	Eucalyptus marginata	Native	Good	High	No
164	Eucalyptus marginata	Native	Good	High	No

Data sourced from Classic Tree Services (2019). Arboricultural Assessment – Balcatta Refuse Centre - Pre-development assessment of trees within the Balcatta Refuse Centre

1.1.4 Mitigation

As mentioned previously, the Project considered the location of the trees to avoid their unnecessary removal through modification of the Project layout. Therefore, the clearing of trees for the project has been minimised where possible to reduce impacts. The removal of 27 trees out of the 197 trees present within the site represents approximately 13% of the trees within the site boundary. Sixty six (66) or 33% of the 197 trees onsite are determined to be very high or high value trees. Of the 66 very high or high value trees, 18 high value trees will require removal for the Project.

The majority of the site is historically cleared and the surrounding areas are largely used for residential and industrial purposes therefore placing it in the context of a very fragmented landscape with little remaining native vegetation and ecological value. Given the number of trees to be cleared within the site, it is not deemed that this will result in a significant impact and therefore it is not anticipated that flora and vegetation is a key environmental factor requiring assessment by the EPA.

A Works Approval Application has been submitted to the Department of Water and Environmental Regulation (DWER) and is currently under assessment. Through this process, the DWER will assess the potential impacts from the removal of these tree species under the Environmental Protection (Clearing of Native Vegetation) Regulations 2004 (Regulations). It is anticipated that the removal of these trees will fall under the Regulation 5 Item 1 (Clearing to construct a building) and Item 19 (Clearing of isolated trees) of the DWER's 'A guide to the exemptions and regulations for clearing native vegetation Under part V of the Environmental Protection Act 1986'.

The City have recently sought advice from the DWER regarding the removal of trees from the Site which confirmed if all relevant building permits are obtained, and the clearing is kept under five (5) hectares, that an exemption under Regulation 5 Item 1 may apply.

Clearing required for the Project will be undertaken progressively through a staged construction phase running from approximately September 2021 to August 2023.



1.2 Greenhouse Gas Emissions

Please provide further information regarding the potential for greenhouse gas (GHG) emissions associated with this proposal. Please refer to the EPA (2020) Environmental Factor Guideline: Greenhouse Gas Emissions for guidance on when GHG emissions should be considered a key environmental factor.

1.2.1 EPA Policy and Guidance

EPA (2020) Environmental Factor Guideline: Greenhouse Gas Emissions is the relevant policy and guidance document to this question raised by the EPA.

1.2.2 Receiving Environment

The RCB is owned and managed by the City and has been in operation since 1979. There are a range of recycling and waste management activities occurring on the site which require the use of machinery and vehicles to handle and transport waste. At present the vehicle emissions occur from the movement of the machinery and vehicles, waste collection contractors, staff, visitors and customers.

1.2.3 Proposal Activities

The GHG emissions arising from the Project are associated with the movement of vehicles and machinery during clearing, construction and operation. As there is no processing (composting, thermal treatment, etc) of waste on site there is no GHG emissions associated within these activities. The project will simply see a continuation of what is currently occurring on the site which includes a variety of vehicles entering, moving around the site and exiting the site on a daily basis. Emissions will occur from the movement of these vehicles as well as from the use of machinery for site operational activities (i.e. handling and transferring waste). GHG's will be emitted directly into the atmosphere in all open spaces and within the enclosed Waste Transfer Station (WTS) building from use of machinery and B-doubles.

The conceptual design for the Project has improved the existing layout and operational efficiency for the site and provides a range of modern recycling and waste management activities which is an advancement from the current activities. The facility has been designed to maximise the recovery of materials which in turn will reduce the volume of waste to be landfilled. This will further reduce the indirect and downstream GHG emissions associated with the facility.

Furthermore, the Project will also deliver a range of operational efficiencies particularly vehicle movements. Of particular note is the utilisation of B Double road trains for the transport of the various waste streams from the WTS and also the Greenwaste shed. This is halving the waste transfer vehicles movements compared to the current facility which could only cater for single transfer trailers as opposed the new conceptual design which can cater for B Double Road Trains. In addition the City has advanced its operation to hook lift bin services for the collection of a range of recyclable materials which will significantly improve the operational efficiencies by the community direct feeding receptacles. This in turn will eliminated the use of a front end loader to load the receptacles but also reduce the vehicle movements through the use of the hook lift receptacles.

Therefore, it is anticipated that the Project will result in a reduction in overall emissions due to the more efficient operations at the site and the increased diversion of materials from landfill which will in result in a reduction of downstream GHG emissions.



1.2.4 Mitigation

As stated within the EAMP section 5.12, "Mobile machinery will have emission standard engines, particulate filters, catalytic converters and/or wet scrubbers. Emissions will also be reduced through minimising idling times; and Regular maintenance of mobile plant and vehicles will be undertaken to ensure emission controls are maintained. Low emission fuels and sulphur lubricants will be used as much as practicable." This will apply to operation of the City's vehicles within the Waste Transfer Station and across the whole site. GHG emissions generated from customer vehicles is outside the control of the City.

Given the increased resource recovery, improved operational efficiencies and vehicle movements along with the proposed vehicle emission reduction controls, the Project GHG emissions are not deemed significant. Therefore, GHG emissions is not anticipated to be a key environmental factor requiring further assessment by the EPA.

1.3 Provision of Figures

Please provide Figures 1 - 10 as listed within the Environmental Assessment and Management Plan (Talis Consultants, version 1b, 14 April 2021) as they were not included in the submission of documents.

A copy of Figures 1 to 10 is provided as Attachment 2 to this letter for ease of reference and provided within the updated EAMP provided as Attachment 3.

1.4 Provision of IBSA Data Package

Please provide an Index of Biodiversity Surveys for Assessments (IBSA) data package for each biodiversity survey report undertaken in accordance with the Instructions and Form: IBSA Data Packages. These instructions and forms are available on the EPA's website www.epa.wa.gov.au/forms-templates/instructions-preparing-data-packagesindex-biodiversitysurveys-assessments-ibsa

As the site was cleared circa 1979, it is unknown if a flora and flora survey was undertaken at the time. The Arboricultural Survey in 2019 only surveyed the remaining trees as no middle or understory is present on the site. The EPA 'Instructions for the preparation of data packages for the Index of Biodiversity Surveys for Assessments (IBSA)' specifies that

"Where new data have been obtained but a biodiversity survey report does not exist, such as for isolated observations or for extremely small datasets, there is no requirement for an IBSA data package to be prepared."

Therefore, it is assumed that the data gathered during the Arboricultural Survey is not deemed suitable for IBSA and has therefore not be submitted. A copy of the survey is provided as an attachment to this letter.



Closing

The City and Talis anticipate that the information provided in response to the request for further information is sufficient to allow the EPA to continue with the assessment of the Project. If you have any queries or require further information, please do not hesitate to contact the undersigned.

Yours sincerely

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Ronan Cullen Director and Waste Management Section Leader

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Attachments:

- 1- Figures 1 to 10
- 2- Arboricultural Assessment
- 3- Environmental Assessment and Management Plan