



INT20/47689

14 April 2020

Mr Jim Betts
Secretary
Department of Planning, Industry and Environment
4 Parramatta Square, 12 Darcy St
PARRAMATTA NSW 2150

Kathryne.glover@planning.nsw.gov.au

Dear Mr Betts

Environmental Assessment Requirements– SSD 10446 – Luddenham Resource Recovery Facility, 275 Adams Road, Luddenham (Lot 3 DP 623799)

Thank you for your correspondence dated 1 April 2020 requesting Environmental Assessment Requirements (EARs) for the above proposal.

The NSW Department of Primary Industries (NSW DPI) Agriculture is committed to the protection and growth of agricultural industries, and the land and resources upon which these industries depend. Important issues are the potential impact on limited agricultural resources and the ability to rehabilitate the land to enable continued agricultural investment.

NSW DPI Agriculture provides recommended EARs (Attachment 1) and a range of publications to assist consent authorities, community and proponents in addressing the recommended EARs (Attachment 2).

Should you require clarification on any of the information contained in this response, please contact me on 0429 864 501 or by email at landuse.ag@dpi.nsw.gov.au

Yours sincerely

A handwritten signature in black ink, appearing to read 'Paul Garnett'.

Paul Garnett
Agricultural Land Use Planning Officer
Department of Primary Industries - Agriculture

Attachment 1: Environmental Assessment Requirements

Issue	Environmental Assessment Requirement for Environmental Impact Statement
Site Suitability	<ul style="list-style-type: none"> • Include a Land Use Conflict Risk Assessment (LUCRA) to identify potential land use conflict with incompatible and sensitive land uses including surrounding agricultural land uses. The LUCRA is to address separation distances and management practices to minimise odour, dust and noise impacts. A LUCRA is described in the DPI Land Use Conflict Risk Assessment Guide. • Include a map to scale showing the above operational and infrastructure details including separation distances from incompatible and sensitive land uses including agricultural land uses.
Consideration of impacts on agricultural resources and land	<p>Characteristics of Agricultural Land</p> <ul style="list-style-type: none"> • Describe the current and historical agricultural land uses on surrounding land in the locality including the land capability and agricultural productivity of the surrounding land. <p>Impacts on Agricultural Land, Resources and Land Uses</p> <ul style="list-style-type: none"> • Detail the potential impacts from the proposed development on agricultural land and agricultural land uses in the locality. • Consider possible cumulative impacts on surrounding agricultural enterprises and landholders. • Assess impacts on agricultural support services, processing and value adding industries. <p>Measures to mitigate impacts on Agricultural land</p> <ul style="list-style-type: none"> • Demonstrate that all significant impacts on current and potential agricultural developments and resources can be reasonably avoided or adequately mitigated.
Suitable and secure water supply	<ul style="list-style-type: none"> • Outline any impacts to water use for agriculture and measures to mitigate against these impacts.
Biosecurity	<ul style="list-style-type: none"> • Include a biosecurity (pests, weeds and disease) risk assessment outlining the likely plant, animal and community risks. • Include details of how the proposal will deal with identified biosecurity risks as well as contingency plans for any failures. Include monitoring and mitigation measures for weed and pest management. • Detail the design of fencing and its adequacy to keep livestock out.
Traffic movements	<ul style="list-style-type: none"> • Detail the volume and route of traffic movements for the proposed development and how potential impacts on surrounding agricultural land uses are proposed to be mitigated (eg noise, dust, volume of traffic). This should include consideration of Travelling Stock Reserves (TSR) and the movement of livestock or farm vehicles along / across the affected roads.
Community consultation	<ul style="list-style-type: none"> • Consult with the owners / managers of affected and adjoining neighbours and agricultural operations in a timely and appropriate manner about; the proposal, the likely impacts and suitable mitigation measures or compensation.

Emergency Management

- The proposal is to detail contingency plans to enable the operation to deal with emergency situations. The proposal is to detail Emergency Management procedures and responsibilities for responding to bushfire threats and possible mass mortality events which might result from extreme climatic conditions, routine or emergency animal disease outbreaks.

Attachment 2: Guidelines for assessment

Title	Location
Land Use Conflict Risk Assessment Guide	www.dpi.nsw.gov.au/content/agriculture/resources/lup/development-assessment/lucra
Agricultural Issues for Extractive Industry Development	http://www.dpi.nsw.gov.au/content/agriculture/resources/lup/development-assessment/extractive-industries
Agricultural Issues for Landfill Developments	http://www.dpi.nsw.gov.au/content/agriculture/resources/lup/development-assessment/landfill-developments
Infrastructure Proposals on Rural Land	http://www.dpi.nsw.gov.au/content/agriculture/resources/lup/development-assessment/infrastructure-proposals