

27 April 2022

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Our ref: *D2022/31935*

Sally Munk
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Subject: Berrima Cement Works – SWDF increase, Delivery Variation & Site Access - DA401-11-2002-I-Mod14

Dear Ms Monk

WaterNSW appreciates the opportunity to provide comment on a proposed modification to the existing consent (DA401-11-2002-I – MOD 14). The modification seeks:

- Increased use of Solid Waste Derived Fuels (SWDF) from 100 000 to 250 000tpa within the kiln
- Construction of alternate haulage route through the site
- Expansion of current site storage and handling facilities
- Increase SWDF deliveries.

As the development is located within the Sydney Drinking Water Catchment, clauses 8.7, 8.8 and 8.10 of the *State Environmental Planning Policy (Biodiversity and Conservation) 2021* (the SEPP) apply. A major impact on water quality from the proposed modification is the construction of approximately 1.3km long new sealed access road (increasing impervious area on the site by approximately 10 000m²), which will impact on the quantity and quality of the stormwater runoff from the site. There are no stormwater quality improvement devices (SQIDs) proposed for the access road.

WaterNSW has reviewed the documentation including the letter by SLR (dated 8 February 2022) and it does not address:

- Clause 8.7 of the SEPP: Recommended Practices and Performance Standards. Some of the applicable current recommended practices (CRP) which are not incorporated include:
 - Sealed Roads Best Practice Guide (ARRB 2020)
 - Guidelines for Treatment of Stormwater Runoff from Road Infrastructure - AP-232/03 – Austroads 2003
- Clause 8.8 of the SEPP: Demonstration of a neutral or beneficial effect (NorBE) on water quality. A suitable way to show that the proposed access road will meet NorBE is to undertake a MUSIC stormwater quality modelling using the parameters and procedures in WaterNSW's CRP, *Using MUSIC in Sydney Drinking Water Catchment (2019)*. The pollutant export rates contained in that CRP are appropriate to show that any proposed SQIDs for the proposed access road will ensure that NorBE is met.

Based on experience from similar proposals, WaterNSW believes that the proposed modification can meet the requirements of the SEPP if suitable SQIDs are used to treat the runoff from the

proposed access road. However, as it stands the proposal does not meet the requirements of the SEPP. Water NSW would be willing to review any future documentation addressing the above matters.

It is requested that WaterNSW be listed a stakeholder in any further consultation on the project. If you have any questions, please contact Jim Caddey via email at environmental.assessments@waternsw.com.au.

Yours sincerely

Daryl Gilchrist

DARYL GILCHRIST
Manager Catchment Protection