



OUT20/10142

Director – Industry Assessments
Planning and Assessment
Department of Planning Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Ellen.luu@planning.nsw.gov.au

Dear Ms Luu

Luddenham Advanced Resource Recovery Centre - SSD - 10446

Thank you for the opportunity to provide comment on State Significant Development 10446 for the Luddenham Advanced Resource Recovery Centre.

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.

DPI Agriculture provided environmental assessment requirements (EARs) on 14 April 2020.

It is noted that the final Secretary's Environmental Assessment Requirements (SEARs) did not include the environmental assessment requirements nominated by DPI Agriculture. The SEARs required the proponent to consult directly with certain agencies during the preparation of the EIS. DPI Agriculture was not one of the agencies required to be consulted.

The Environmental Impact Statement (EIS) for the proposed ARRC has not addressed all of the environmental assessment requirements identified by DPI Agriculture. Specifically, the EIS has not:

1. included a land use conflict risk assessment with neighbouring agricultural land uses;
2. adequately identified the nature of all agricultural land uses on nearby rural land and the impacts of the proposed development on those agricultural land uses. The analysis of potential impacts on sensitive receptors has been limited to residential and commercial land uses and has not taken into account the potential impacts on the neighbouring agricultural land uses. The impact of traffic movements including, dust and litter on the quality of the water in adjacent farm dams is a significant concern for adjoining landowners;
3. adequately identified the necessary mitigation measures to address the potential impacts on agricultural land uses;
4. included a biosecurity risk assessment to assess the risk to neighbouring agricultural land uses from pests, weeds and disease that may arise from the acceptance and handling of waste at the proposed facility; and
5. included 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.

Should you require clarification on any of the information contained in this response, please contact Paul Garnett, Agricultural Land Use Planning Officer, on 0429 864 501 or by email at landuse.ag@dpi.nsw.gov.au

Yours sincerely

A handwritten signature in black ink that reads "T Prentice". The signature is written in a cursive style with a period at the end.

25/8/20

Tamara Prentice
Manager Agricultural Land Use Planning
Department of Primary Industries - Agriculture