



Our ref: DOC20/788728
Senders ref: SSD-9320662

Ms Susan Fox
Planning and Assessment Group
Department of Planning, Industry and Environment
4PSQ, 12 Darcy Street
PARRAMATTA NSW 2150

Dear Ms Fox

Subject: EES comments on Request for SEARs – Cobra Waste Solutions – Resource Recovery Facility – 30 Loftus Road Yennora– SSD-9320662

Thank you for your email of 18 September 2020 requesting advice in relation to this State Significant Development. The Environment, Energy and Science Group (EES) has reviewed the Scoping Report and provides the following comments and recommendations in Attachment A.

Please note that from 1 July 2020, Aboriginal cultural heritage (ACH) regulation, including advice on major projects, is now managed by the Heritage NSW. The new contact for the ACH regulation team is heritagemailbox@environment.nsw.gov.au.

Biodiversity

Please be advised EES is currently considering a BDAR Waiver request for this SSD. The determination on this request will be forwarded separately.

Flooding

The flood assessment (including associated management of any flood risks) should address the attached EES SEARs Requirements in relation to mainstream and/or overland flooding for the full range of floods.

Landscaping

The BDAR waiver report notes there are recently planted mature-size gum trees on the northern and western boundary of the site and this vegetation is to be retained (page 10). EES notes the Site Plan and Truck Movement plan attached to the Scoping Report show trees along the western boundary but none along the northern boundary. The EIS should clarify this.

If a Landscape Plan is to be prepared for the site, EES recommends it includes details on:

- existing vegetation at the site (location, plant species, number of trees etc)
- plant species to be planted - the plant species should comprise local provenance species (trees, shrubs and groundcovers) from the native vegetation community that once occurred on the site (rather than use non-local native species or exotics)
- the proposed removal of any trees - any trees removed are replaced at a ratio greater than 1:1
- the pot size of any trees to be planted - advanced sized trees should be used to increase urban tree canopy cover
- the area/space required to allow planted trees to grow to maturity

- the plant maintenance regime.

Non-conforming loads

The Scoping Report states the proposal supports the reduction in illegal dumping by providing a facility that accepts unwanted wastes (section 2, page 3). It indicates records of all truck loads entering the facility would be maintained at the weighbridge and trucks with conforming loads would be weighed on the weighbridge then directed inside the building while non-conforming loads would be rejected and turned away (section 3.3, page 6).

EES notes the applicant offers recycling and waste services across the Sydney region and suggests the EIS addresses whether the Yennora facility will provide drivers of non-conforming loads with advice/contact details on other recovery facilities where their loads can be taken to assist prevent illegal dumping of the non-conforming loads.

If you have any questions about this advice, please do not hesitate to contact Janne Grose, Senior Conservation Planning Officer via email at janne.grose@environment.nsw.gov.au or on 8837 6017

Yours sincerely



28/09/20

Susan Harrison
Senior Team Leader Planning
Greater Sydney Branch
Environment, Energy and Science

Attachment A – EES Group Standard Environmental Assessment Requirements

Water and soils
<ol style="list-style-type: none">1. The EIS must map the following features relevant to water and soils including:<ol style="list-style-type: none">a. Acid sulfate soils (Class 1, 2, 3 or 4 on the Acid Sulfate Soil Planning Map).b. Rivers, streams, wetlands, estuaries (as described in s4.2 of the Biodiversity Assessment Method).c. Wetlands as described in s4.2 of the Biodiversity Assessment Method.d. Groundwater.e. Groundwater dependent ecosystemsf. Proposed intake and discharge locations
<ol style="list-style-type: none">2. The EIS must describe background conditions for any water resource likely to be affected by the development, including:<ol style="list-style-type: none">a. Existing surface and groundwater.b. Hydrology, including volume, frequency and quality of discharges at proposed intake and discharge locations.c. Water Quality Objectives (as endorsed by the NSW Government http://www.environment.nsw.gov.au/jeo/index.htm) including groundwater as appropriate that represent the community's uses and values for the receiving waters.d. Indicators and trigger values/criteria for the environmental values identified at (c) in accordance with the ANZECC (2000) Guidelines for Fresh and Marine Water Quality and/or local objectives, criteria or targets endorsed by the NSW Government.e. Risk-based Framework for Considering Waterway Health Outcomes in Strategic Land-use Planning Decisions http://www.environment.nsw.gov.au/research-and-publications/publications-search/risk-based-framework-for-considering-waterway-health-outcomes-in-strategic-land-use-planning
<ol style="list-style-type: none">3. The EIS must assess the impacts of the development on water quality, including:<ol style="list-style-type: none">a. The nature and degree of impact on receiving waters for both surface and groundwater, demonstrating how the development protects the Water Quality Objectives where they are currently being achieved, and contributes towards achievement of the Water Quality Objectives over time where they are currently not being achieved. This should include an assessment of the mitigating effects of proposed stormwater and wastewater management during and after construction.b. Identification of proposed monitoring of water quality.

- c. Consistency with any relevant certified Coastal Management Program (or Coastal Zone Management Plan)

4. The EIS must assess the impact of the development on hydrology, including:
- a. Water balance including quantity, quality and source.
 - b. Effects to downstream rivers, wetlands, estuaries, marine waters and floodplain areas.
 - c. Effects to downstream water-dependent fauna and flora including groundwater dependent ecosystems.
 - d. Impacts to natural processes and functions within rivers, wetlands, estuaries and floodplains that affect river system and landscape health such as nutrient flow, aquatic connectivity and access to habitat for spawning and refuge (e.g. river benches).
 - e. Changes to environmental water availability, both regulated/licensed and unregulated/rules-based sources of such water.
 - f. Mitigating effects of proposed stormwater and wastewater management during and after construction on hydrological attributes such as volumes, flow rates, management methods and re-use options.
 - g. Identification of proposed monitoring of hydrological attributes.

Flooding and coastal hazards

5. The EIS must map the following features relevant to flooding as described in the Floodplain Development Manual 2005 (NSW Government 2005) including:
- a. Flood prone land.
 - b. Flood planning area, the area below the flood planning level.
 - c. Hydraulic categorisation (floodways and flood storage areas)
 - d. Flood Hazard.
6. The EIS must describe flood assessment and modelling undertaken in determining the design flood levels for events, including a minimum of the 5% Annual Exceedance Probability (AEP), 1% AEP, flood levels and the probable maximum flood, or an equivalent extreme event.
7. The EIS must model the effect of the proposed development (including fill) on the flood behaviour under the following scenarios:
- a. Current flood behaviour for a range of design events as identified in 14 above. This includes the 0.5% and 0.2% AEP year flood events as proxies for assessing sensitivity to an increase in rainfall intensity of flood producing rainfall events due to climate change.
8. Modelling in the EIS must consider and document:
- a. Existing council flood studies in the area and examine consistency to the flood behaviour documented in these studies.
 - b. The impact on existing flood behaviour for a full range of flood events including up to the probable maximum flood, or an equivalent extreme flood.

- c. Impacts of the development on flood behaviour resulting in detrimental changes in potential flood affection of other developments or land. This may include redirection of flow, flow velocities, flood levels, hazard categories and hydraulic categories
- d. Relevant provisions of the NSW Floodplain Development Manual 2005.

9. The EIS must assess the impacts on the proposed development on flood behaviour, including:
- a. Whether there will be detrimental increases in the potential flood affectation of other properties, assets and infrastructure.
 - b. Consistency with Council floodplain risk management plans.
 - c. Consistency with any Rural Floodplain Management Plans.
 - d. Compatibility with the flood hazard of the land.
 - e. Compatibility with the hydraulic functions of flow conveyance in floodways and storage in flood storage areas of the land.
 - f. Whether there will be adverse effect to beneficial inundation of the floodplain environment, on, adjacent to or downstream of the site.
 - g. Whether there will be direct or indirect increase in erosion, siltation, destruction of riparian vegetation or a reduction in the stability of riverbanks or watercourses.
 - h. Any impacts the development may have upon existing community emergency management arrangements for flooding. These matters are to be discussed with the NSW SES and Council.
 - i. Whether the proposal incorporates specific measures to manage risk to life from flood. These matters are to be discussed with the NSW SES and Council.
 - j. Emergency management, evacuation and access, and contingency measures for the development considering the full range of flood risk (based upon the probable maximum flood or an equivalent extreme flood event). These matters are to be discussed with and have the support of Council and the NSW SES
 - k. Any impacts the development may have on the social and economic costs to the community as consequence of flooding.

(END OF SUBMISSION)