



16 April 2020

Will Hodgkinson
A/ Principal Planner
Industry Assessments
NSW Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Will,

Proposed State Significant Development (SSD-10446) - Luddenham Resource Recovery Centre

I refer to your email advising that the Department of Planning, Industry and Environment (Department) has received a request for Secretary's Environmental Assessment Requirements (SEARs) for a Resource Recovery Centre (Proposed Development) at 275 Adams Road, Luddenham (Site). The Proposed Development is a State Significant Development under the *Environmental Planning and Assessment Act 1979*.

The Department is seeking input from Western Sydney Airport (WSA) in relation to the preparation of the SEARs.

The Site directly adjoins the Western Sydney International (Nancy Bird Walton) Airport (the Airport). WSA's primary concern with the Proposed Development is that the proposed land use is incompatible with Airport operations and will likely cause land use conflict and adverse impacts on the future development and operation of the Airport. This is evident given the proposed zoning of the Site in the draft Aerotropolis State Environmental Planning Policy does not permit Resource Recovery Centres on the Site.

In addition to WSA's concerns regarding the Proposed Development generally, WSA considers that the following key issues need to be considered as part of the assessment of the Proposed Development:

1. Aviation safeguarding with particular assessment against the matters identified in the National Airports Safeguarding Framework, including but not limited to light spill, windshear, wildlife hazards and protection of airspace. These matters are identified in the Western Sydney Aerotropolis Plan and draft Aerotropolis State Environmental Planning Policy. It is noted that the Scoping Report does not adequately address aviation safeguarding and that an aviation impact assessment should be included in the Environmental Impact Statement (EIS).
2. Dust and particulate matter impacts on the Airport operations. The EIS must assess the potential dust and particulate matter impacts of not only the Proposed Development but also on a cumulative basis given that the quarrying operations are proposed to recommence. This is imperative given the Site is located in close proximity to the runway touchdown threshold for aircraft landing on runway 23R. Although not the subject of this application, it is noted that



the proposed extension of quarrying activity beyond the opening of the Airport is a concern (particularly due to potential dust and particulate matter).

3. The waste stockpiles not proposed to be confined to an enclosed space/warehouse, must be subject to a detailed assessment of windblown dust from such stockpiles to adequately assess the impact of same on the Airport operations.
4. The proposal includes waste, product and reject material bays. The type of material stockpiled or stored in these bays must be identified in detail. The potential impacts of litter and other windblown material and debris must be assessed in context of Airport operations.
5. The types of waste material to be accepted on the site needs to be clearly specified to enable a proper assessment of potential environmental impacts. Putrescible and organic waste is known to attract wildlife and create significant wildlife hazard risks to aircraft. Although it is stated that putrescible waste will not be accepted, there are types of non-putrescible waste that may cause adverse impacts on the operation of the Airport including in particular wildlife hazards and it is for this reason that the types of wastes must be clearly stipulated in order for a proper assessment to be carried out.
6. A wildlife attraction risk assessment must be undertaken and must address the type of waste material proposed to be accepted, nearby wildlife attractors including vegetation, water, land fill and other land uses that also attract wildlife. The wildlife hazard assessment must also assess the risk of birds transiting through airspace (particularly approach and departure paths and movements across the airfield).
7. Any proposed landscaping needs to assess the potential for wildlife/bird attraction.
8. It is unclear if landfilling is proposed as part of this application. If landfilling is proposed, this should be clearly detailed as landfill material may generate land fill gas. Management of any land fill gas (e.g. flaring) needs to be assessed as it can create a hazard to Airport operations. In addition, wildlife hazards associated with landfilling will need to be assessed.
9. The Site also interfaces with WSA's proposed fuel farm. Accordingly, the potential impact of waste recycling operations on future fuel infrastructure needs to be assessed having regard to, for example, vibration impacts on infrastructure at the Airport from crushing, grinding, and shredding operations on the Site. The environment impact statement should also address the potential for hazards associated with the resource recycling.
10. Sediment and run-off impacts to Oaky Creek.
11. WSA understood that heavy vehicle access from Adams Road was restricted which is why the previous owners had been granted a license to access the Site, through the Airport. That license has now been terminated and access through the Airport is no longer appropriate given the construction works and future operations of the Airport. Accordingly, suitable access arrangements need to be resolved.
12. The EIS also needs to consider the cumulative impacts of this Proposed Development with the re-activation of quarrying activities on the Site.



Lastly, the Scoping Report notes that the proponent met with WSA on 18 February 2020. WSA was briefed on the proposal at this meeting and a range of issues were raised and discussed at the meeting. The Scoping Report also states the following:

"It was agreed that the development application for the RRC would need to address these issues but that there are likely to be feasible measures that can address any issues that could impact airport operations"

Whilst there were a number of issues raised and discussed, WSA did not agree that there would be measures that could address the issues raised and rejects such a statement. The meeting was a high-level briefing of the proposal and an identification of issues. The Scoping Report is misleading in its assertion that there are feasible measures to address issues when limited detail on the proposed development was provided and no environmental assessment of the proposed development had been undertaken. The feasibility of such measures (which have not been detailed) cannot be determined until all environmental impacts have been assessed, including an assessment of the cumulative impacts of the resource recovery centre and quarrying operations.

WSA is of the strong view that land uses such as resource recovery centres are not compatible in such close proximity to the Airport and this is supported by the zoning in the draft Aerotropolis State Environmental Planning Policy which prohibits development of this nature on the Site. Given the significance of the Airport to the Western Sydney region, safeguarding the future development and operations of the Airport is of paramount importance and any assessment of the Proposed Development must properly consider, address and mitigate any adverse impacts on the Airport.

If you would like to discuss further, please contact me at kosborne@wsaco.com.au

Yours Sincerely,

A handwritten signature in blue ink that reads "K. Osborne". The signature is fluid and cursive, with a long horizontal stroke at the end.

Kirk Osborne
Lead Town Planner