

22 July 2021

Attention:  
David Koppers  
Senior Environmental Assessment Officer



Re: SSD-10459

PO Box 1563  
Warriewood  
NSW 2102

ABN 45 162 835 083

Dear David

**Downer Sustainable Road Resources Centre – operational conditions**

Consent was granted to VE Property to construct and operate State significant development (SSD) 10459 (the consent) on 31 January 2021.

Downer EDI Works Pty Ltd (Downer) will be constructing and operating the Sustainable Road Resources Centre component of the consent (the project) and is seeking permission to combine some of the management plans required for the operational phase of the project.

The consent requires submission of an operational environmental management plan (OEMP) comprising the following as separate plans:

- B8 – air quality management plan (AQMP)
- B27 – surface water management plan (SWMP)
- B18 – driver code of conduct (DCC)
- B42 – waste monitoring program (WMP)
- B45 – waste management plan (WMP)
- B23 – flood emergency response plan (FERP)

It is Downer's preference to combine the SWMP, WMP, WMP and possibly the AQMP into the OEMP as chapters to reduce repetition across plans and to have the info in a single document/point of reference as this will improve the OEMP's implementation onsite.

Downer would keep the DCC and FERP separate as the DCC will need to be available to hand to drivers and the FERP has already been drafted.

Downer seeks permission to combine the SWMP, WMP and WMP with the OEMP under Condition A14(b), which enables it to *combine any...plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined)*... with the approval of the Planning Secretary.

Downer further requests the right to combine the AQMP (which is being prepared by a sub-consultant), depending on the size of the plan, into the OEMP.

Downer believes there is a clear relationship between the SWMP, WMP, WMP, AQMP and OEMP as these will be plans prepared and implemented to manage the environmental performance during operation of the DSRRC. These plans need to be prepared in accordance with Condition C1, which would result in substantial duplication across the plans. Further, separate plans would have spread information across several documents rather than combining them in a single point of reference and assisting their implementation onsite.

Downer believes it can still comply with Condition C1, with corresponding OEMP sections covering the requirements for multiple environmental matters rather than the single matters as would have been the case in the individual plans.

Please contact me if you have any questions.

Kind Regards

A handwritten signature in black ink, appearing to read 'M Roberts', with a stylized flourish at the end.

Mark Roberts  
**Principal Environmental Consultant**

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