Blacktown City Council

Your ref: SSD-29999239
File no: MC-21-00007

25 October 2021

NSW Department of Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2001

Recipient Delivery bruce.zhang@planning.nsw.gov.au

Attention: Mr Zhang

Dear Sir

SSD-29999239 – Request for SEARS - Materials Recycling Facility, 600 Woodstock Avenue, Rooty Hill

Thank you for your correspondence dated 14 October 2021 requesting our advice about the proposed Materials Recycling Facility at the abovementioned site which is a State Significant Development proposal under section 4.36 of the *Environmental Planning and Assessment Act 1979.*

We request that the matters detailed in the attachment to this letter are included in the final SEARs to the applicant so they are all comprehensively addressed in the final Environmental Impact Statement.

If you would like to discuss this matter further, please contact Judith Portelli, our Manager Development Assessment, on 9839 6228.

Yours faithfully

Peter Conroy
Director City Planning and Development

Blacktown City Council's submission to SSD 29999239 - Materials Recycling Facility, Rooty Hill

1. Statutory requirements

a. The proposal is to address compliance with the relevant controls in Blacktown Local Environmental Plan 2015 and Blacktown Development Control Plan 2015.

2. Planning requirements

a. Given the scale of the proposed development, the Environmental Impact Statement is to address the visual impact including streetscape, height, scale, treatment of elevations, materials finishes and colours.

b. Details are to be provided showing how the water tanks will be screened from view from the street.

c. A detailed landscaping plan is to be submitted, providing 7.5m landscaped setbacks for the building on the Kellogg Road frontages in accordance with Blacktown Development Control Plan 2015 Part E.

d. Any signage must be accompanied by a State Environmental Planning Policy No. 64 – Advertising and Signage assessment.

e. A cut and fill plan, and details of any retaining walls are to be provided.

f. Submission of a Waste Management Plan for the construction and use of the site.

g. The stacked parking arrangement is to be supported by a draft operational plan of management to show how this will be workable.

h. Submit plan demonstrating how the parking spaces required by Blacktown Development Control Plan 2015 Part A can still be met if the building were converted into a manufacturing or warehousing use in the future.

i. Consultation with Sydney Water regarding any amplification of water or sewerage or trade waste services to the site.

3. Engineering requirements

a. The development is to address compliance with Blacktown City Council Engineering Guide to Development – 2005.

4. Drainage requirements

a. The applicant is to provide an On-site Stormwater Detention (OSD) strategy in the EIS, this is to include:

- Details of the proposed On-site stormwater detention required for this development are to be provided

- The OSD design is to be as per Council's Water Sensitive Urban Design (WSUD) Standard Drawings and the 'OSD Deemed to Comply Spreadsheet' (available online)
- An OSD catchment plan and OSD spreadsheet with bypasses (if any)
- Evidence of compliance with Council's WSUD Developer Handbook for further design considerations.

b. Water Sensitive Urban Design (WSUD) strategy

- The applicant is to nominate their strategy either an **on-lot treatment** or **Voluntary Planning Agreement (VPA)** is required for the development site.
- The **on-lot treatment** option is to be assessed using Blacktown Council's MUSIC Link. Refer to the WSUD Developer's Handbook for further design requirements.
- Provide a MUSIC catchment plan and MUSIC model if the **on-lot water treatment** option is proposed.
- The **VPA** option will enable the developer to enter into an agreement with Council by paying a contribution. The applicable contribution rate is $62,890/ha plus an administration fee of 1.5%, and is to be indexed in accordance with Council's policy on the indexing of Section 7.11 contributions. Please contact Catherine.Harris@blacktown.nsw.gov.au for rates and applications before submitting a DA.
- In addition where a VPA is entered into, an approved gross pollutant trap (GPT) is required to meet the gross pollutant and total hydrocarbon pollutant retention targets through an oil baffle. The GPT is to be sized to treat 6month flow which is 75% of 1yr flow. Use Rational method or DRAINS to calculate the 6month flow.

c. Water Conservation strategy

- Water conservation is required for this development. This water conservation strategy is to include:
- Details of the Rainwater tank required to meet the water conservation targets under Part J for the development. A minimum target of 80% reuse demand is to be achieved.
- Details of the Non-potable water demand is to include landscape watering and toilet/urinal flushing.
- The Model for Urban Stormwater Improvement Conceptualisation (MUSIC) is generally used to assess the performance of the rainwater tank using the node water balance and an electronic copy of the MUSIC model needs to be provided to Council for assessment.
- Refer to WSUD developers Handbook for further design requirements and usage rates.
- The Model is to allow for a minimum usage rate of 0.1 kL/day/toilet or urinal and a minimum of 0.4 kL/m^2/ year for landscape watering (excluding turfed areas).

- The Model can take into account where the development is used only 5days/wk, the toilet/urinal usage can be discounted by 5 days out of 7 days, 5/7.
- Other internal usage may involve truck/bin washing or other industrial usage and specific data will need to be supplied to justify these reuse rates.
- All calculations in the model (number of toilets etc.)/graphs/catchments and models are to be provided.

d. Other Engineering/Drainage issues to be addressed in the Engineering/Drainage strategy include:

- Investigate the swale to the south east of the development and the impact the development has on it. Provide catchment plans and calculations showing the existing swale and any proposed changes.
- A freeboard will apply of 300 mm above the 1% AEP 1 in 100 year swale flow to the adjacent industrial floors. Other alternatives can also be considered.
- Splay corners are to be shown on the plans 8 m x 8 m to be later dedicated free of cost to Council in accordance with the Engineering Guide to be sure they can be accommodated in the development design.

5. Traffic requirements

a. A Traffic Impact Report is to be submitted covering, but not limited to, provision of compliant parking on-site for staff, visitors and future change of uses; access and traffic generation aspects of the proposed development.

6. Building requirements

a. The details regarding the proposed demolition works will need to be provided in the EIS such as:

- A description of what is to be demolished
- The plan on how it will be demolished
- Details of any hazardous materials
- Waste management details.

b. Details regarding the method to ensure the parts of the building not being demolished remain safe and structurally adequate.

c. The submission of a National Construction Code 2019 compliance report

d. The submission of a Stormwater drainage concept plan

7. Open Space and Tree management requirements

a. The inclusion of an Arboricultural Impact Assessment report in the EIS to determine what trees, including street trees can be retained and how they will be protected.

b. The submission of a Landscape Plan that outlines additional street tree plantings.

8. Natural Areas requirements

a. Biodiversity Assessment Report

A biodiversity assessment report is to be prepared for the site as Cumberland Plain Woodland will be impacted by the proposal. The report is to include any impacts by the proposal and any future impacts from operations of the facility to the Biodiversity Values mapped area 100 m to the east.

b. The Biodiversity Assessment Method 2020

- Chapter 8 – Assessing the impacts of the proposal on biodiversity values
    - This chapter sets out requirements to assess the impacts of the proposal on biodiversity values including direct and indirect impacts on native vegetation, Threatened Ecological Communities (TEC's), threatened species and their habitat.
    - 8.2.2 – The assessor must describe and assess the indirect impacts of the proposal on Threatened Ecological Communities/ Plant Community Types (PCT) and/or threatened species and their habitat, beyond the development footprint.

c. Biodiversity Management Plan

A Biodiversity Management Plan ("BMP"), comprising of a detailed site plan and an accompanying report in a legible format prepared by a person who has qualifications and experience in respect of ecology is to be submitted by the proponent for Council's consideration. The BMP is to relate to the land within Lots 14 and 18 DP 39341 and must contain full details of the actions proposed to be taken with respect to the management of fauna during the course of carrying out the development. The BMP is to be consistent with the NSW Department of Planning, Industry and Environment "Code of Practice for injured, sick and orphaned protected fauna" 2011 (the Code).

The Biodiversity Management Plan must include the following:

- Biodiversity management strategies for pre-construction, construction and post construction activities including environmental control measures for the pre-clearing process.
- A fauna rescue and release procedure. Where tree removal is required then a licensed wildlife carer or ecologist will be required on site as a fauna handler ('Rescuer' under the Code) during tree removal works.
- A procedure for controlling the introduction and spreading of weeds and pathogens, including hygiene protocols and the arrangements for monitoring;
- Proposed strategies for re-use of top soil, tree hollows, logs, coarse woody debris and bush rock.

- All identified tree hollows proposed to be removed, are to be salvaged from trees removed and placed in retained or nearby bushland areas under the direction of an ecologist to Council's satisfaction.
- Details of how for all tree hollows, not able to be salvaged, can be replaced with nest boxes or artificial hollows with three nest boxes / artificial hollows for every one hollow removed.

- A detailed Plan of Management for dealing with unexpected threatened species finds. The procedure must include, as a minimum, the following:
  - stop work arrangements in the immediate area of the threatened species;
  - notification and communication protocol;
  - consultation with the specialists to assess the significance of the find; and
  - a list of approvals, licences or permits likely required prior to recommencing works.

9. Environmental Health requirements

a. Noise and Vibration – A detailed Acoustic report prepared by a qualified acoustic consultant that includes:

- Details of noise and vibration complaints and compliance history
- Detailed assessment of construction noise and operational noise
- Identification of vibration impacts during construction and operation
- Cumulative assessment of noise and vibration impacts with other existing operations

b. Air Quality – a detailed Air quality assessment report that includes:

- Details of air quality and odour complaints and compliance history
- Details and description of activities with potential to cause air quality and odour impacts
- Cumulative assessment of air quality and odour impacts with other current or planned operations in the area

c. Soil Contamination – submission of a stage 2 site contamination report prepared by a qualified and accredited geoscientist to include:

- An assessment of existing contamination at the Site for the proposal and suitability of the Site for the intended use per State Environmental Planning Policy No. 55 – Remediation of Land (SEPP 55)

d. State Environment Planning Policy No. 33 – Hazardous and Offensive Development

- Submission of a preliminary hazard analysis (PHA) for any hazardous or offensive storage facility in this proposal.

DOC21/899790-2

Bruce Zhang
Senior Environmental Assessment Officer
Planning and Assessment Division
Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Mr Zhang

EPA Advice on Secretary's Environmental Assessment Requirements (SEARs)
Materials Recycling Facility – 600 Woodstock Avenue, Rooty Hill (SSD-29999239)

Thank you for the request for advice from Public Authority Consultation (PAE-30002435), requesting the NSW Environment Protection Authority (EPA) provide input into the Secretary's Environmental Assessment Requirements (SEARS) for the proposed Material Recycling Facility (SSD-29999239) at 600 Woodstock Avenue, Rooty Hill (Lot 67 DP804292).

The EPA has reviewed the following proposal:

- *Materials Recycling Facility - 600 Woodstock Avenue, Rooty Hill, Scoping Report,* prepared by Urbis Pty Ltd and dated 30 September 2021.

The EPA understands the proposal is for:

- Demolition of existing structures.
- The construction and operation of a Materials Recycling Facility with capacity to sort 120,000 tonnes per year of materials from the Container Deposit Scheme and co-mingled material from yellow lidded bins.
- A fully enclosed facility with rapid open and close roller doors and weighbridges.
- Capability to operate 24 hours, 7 days a week.

Based on the information provided an environment protection licence under sections 43, 48 and 55 of the *Protection of the Environment Operations Act 1997* (POEO Act) will be required for *Resource Recovery – Recovery of General Waste* and *Waste Storage*, clause 34 and 42 of Schedule 1 of the POEO Act.

The EPA requests that the EIS provide the following information and details:

1. **Matters to be addressed in addition to standard environmental assessment guidelines**
    a. **Waste management** including the following details:
        - types and quantities of each type of waste to be received and a description of handling, processing and storage procedures for each waste type;
        - maximum amount of waste to be stored at any one time and maximum annual throughput; and

- a description of how the Proponent will meet the EPA's record keeping and reporting requirements, including weighing material in and out of the Premises.

b. **Management of odour**. Municipal waste streams are subject to contamination from food and liquid containers increasing the potential of odour issues and leachate ponding and runoff at the Premises or from trucks on the adjacent roads. The Proponent must include detailed consideration of odour generation and mitigation measures to manage odour and leachate.

c. **Air quality** including proposed mitigation measures to minimise the generation and emission of dust during the construction phase and proposed mitigation measures to prevent the generation and emission of dust during the operational phase.

d. **Noise** including potential impacts and mitigation measures during construction and operation.

e. **Water management** including fire water management. Details of the premises storm water system, including the location of discharge points, stormwater drain, pits, outlets and shut off valve or similar device which prevents water pollution leaving the premises.

f. **Fire Management** - the ongoing management of waste material within the building should be in accordance of the Fire and Rescue NSW fire safety in Waste Facilities guidelines. Details of bunding or similar device designed to retain fire water within the processing building.

2. Standard Environmental Guidelines to be followed:

a. Waste Generation and Management

The waste transported, generated, or received as part of carrying out the activity should be minimised and managed in a way that protects all environmental values.

Technical standards and guidelines include:

- Waste guidelines and resources about legislation can be found at **Waste Avoidance and Resource Recovery Strategy and Waste regulations in NSW**
- **EPA's Waste Classification Guidelines** (DECC, 2009)
- **Environmental Guidelines: Solid Waste Landfills** (EPA, Second edition 2016)
- **Environmental Guidelines: Use and Disposal of Biosolids Products** (EPA, 1997)
- **Environmental Guidelines: Composting and Related Organics Processing Facilities** (EPA, 2004)
- **NSW Energy from Waste Policy Statement (**EPA, 2015)
- **Standards for managing construction waste in NSW** (EPA, 2018)

b. Air Quality and Odour Impacts

The assessment should include a detailed Air Quality Impact Assessment (AQIA) for construction and operation of the project in accordance with the Approved Methods for the Modelling and Assessment of Air Pollutants in NSW.

The AQIA should:

- demonstrate how the development will comply with the relevant regulatory framework, specifically the POEO Act and the POEO (Clean Air) Regulation (2010); and
- include a cumulative local and regional air quality impact assessment, including odour.

Technical standards and guidelines include:

- **Approved Methods for the Modelling and Assessment of Air Pollutants in NSW** (EPA, 2016)

- **Approved Methods for the Sampling and Analysis of Air Pollutants in NSW** (DECC 2006)
- **Technical Framework – Assessment and Management of Odour from Stationary Sources in NSW** (DEC, 2006)
- **Generic Guidance and Optimum Model Settings for the CALPUFF Modelling System for Inclusion into the 'Approved Methods for the Modelling and Assessments of Air Pollutants in NSW, Australia** (OEH, 2011)
- **Ground-level ozone impact assessment framework** (EPA, 2015)

c. Water Quality Impacts

The assessment should demonstrate that all practical options to avoid discharge have been investigated and implemented measures have been taken to reduce the level of contaminants in the discharge, so that any impact is reduced where a discharge is necessary.

Applicants must:

- identify and estimate the quality and quantity of all pollutants that may be introduced into the water cycle by source and discharge point;
- describe the nature and degree of impact that any discharge(s) will have on the receiving environment. This includes consideration of all pollutants that pose a risk of non-trivial harm to human health and the environment (this should also include intercepted saline groundwater or acidic runoff generated by acid sulphate soil where appropriate);
- demonstrate assessment against the ambient NSW Water Quality Objectives and environmental values for the receiving waters relevant to the infrastructure activity. This includes the indicators and associated trigger values or criteria for the identified environmental values (this information should be sourced from the ANZG (2018) criteria).

Technical standards and requirements include:

- **Approved Methods for the Sampling and Analysis of Water Pollutants in NSW** (DECC 2008)
- **Australian and New Zealand Guidelines for Fresh and Marine Water Quality** (Australian and New Zealand Governments and Australian State and territory governments,).
- **NSW Water Quality and River Flow Objectives**
- **Using the ANZECC Guidelines and Water Quality Objectives in NSW** (DEC 2006)
- Managing Urban Stormwater: Soils and Construction Volume 1 (Landcom 2004) and Volume 2 (A. Installation of Services; B Waste Landfills; C. Unsealed Roads; D. Main Roads; E. Mines and Quarries) (DEC, 2008), **Stormwater Publications**

d. Noise impacts

The impact of noise and vibration to protect the amenity and wellbeing of the community must be managed. Potential impacts should be minimised through the implementation of all feasible and reasonable mitigation measures.

Technical standards and guidelines include:

- **Noise Policy for Industry**
- **Interim Construction Noise Guideline**

- **ANZEC Guideline for Blasting**
- **Assessing Vibration: A Technical Guide**
- **Road Noise Policy and Application Notes**

e. Contaminated sites

An assessment in accordance with State Environmental Planning Policy 55 (Remediation of Land) of land contamination resulting from past land-use activities must determine, whether the land is suitable for the proposal or will require remediation. The EPA should be notified under section 60 of the Contaminated Land Management Act 1997 of any contamination identified that meets the triggers in the Guidelines on the duty to report contamination under the Contaminated Land Management Act 1997 found at www.epa.nsw.gov.au/your-environment/contaminated-land/statutory-guidelines.

If you have any questions about this request, please contact Laurent Schmitt on (02) 9995 5338 or via email at laurent.schmitt@epa.nsw.gov.au.

Yours sincerely

27 October 2021

ELIZABETH WATSON
Unit Head Regulatory Operations
NSW Environment Protection Authority

DOC21/929416
SSD-299999239

Bruce Zhang, Senior Environmental Assessment Officer
Energy Resource Assessment
Planning and Assessment Group
Department of Planning, Industry and Environment
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2150

Dear Mr Zhang,

Rooty Hill Materials Recycling Facility (SSD-29999923)

I refer to the e-mail of 14 October 2021, requesting advice from Environment, Energy and Science Group (EES) in the Department of Planning, Industry and Environment on the Secretary's Environmental Assessment Requirements (EARs) for the above.

EES has reviewed the 30 September 2021 Scoping Report and the preliminary ecological information prepared and provides the attached recommended EARs.

Please note in relation to the recommended biodiversity EARs (4th dot point) the minimum information and spatial data requirements are detailed in Tables 24 and 25 of the Biodiversity Assessment Method (BAM), and as required more broadly by the revised BAM 2020. Other requirements, such as those relating to the BAM Calculator and the Biodiversity Offsets and Agreements Management System, are detailed in various guidelines, practice notes, updates and other advices issued by EES to BAM accredited assessors (see: www.environment.nsw.gov.au/topics/animals-and-plants/biodiversity/accredited-assessors/assessor-resources).

Should you have any queries on this advice please contact Richard Bonner, Senior Conservation Planning Officer, at richard.bonner@environment.nsw.gov.au or on 9995 6917.

Yours sincerely

S. Harrison

25/10/21

Susan Harrison
Senior Team Leader Planning
Greater Sydney Branch
Biodiversity and Conservation Division

Environment, Energy and Science Group recommended Environmental Assessment Requirements – Rooty Hill Materials Recycling Facility (SSD-29999923)

Biodiversity

- Biodiversity impacts related to the proposed development are to be assessed in accordance with Section 7.9 of the *Biodiversity Conservation Act 2016*, the Biodiversity Assessment Method 2020 and documented in a Development Assessment Report (BDAR). The BDAR must include information in the form detailed in the *Biodiversity Conservation Act 2016* (s.6.12), *Biodiversity Conservation Regulation 2017* (s.6.8) and Biodiversity Assessment Method.
- The BDAR must document the application of the avoid, minimise and offset framework including assessing all direct, indirect and prescribed impacts in accordance with the Biodiversity Assessment Method 2020.
- The BDAR must include details of the measures proposed to address the offset obligation as follows;
  a. The total number and classes of biodiversity credits required to be retired for the development.
  b. The number and classes of like-for-like biodiversity credits proposed to be retired.
  c. The number and classes of biodiversity credits proposed to be retired in accordance with the variation rules.
  d. Any proposal to fund a biodiversity conservation action.
  e. Any proposal to make a payment to the Biodiversity Conservation Fund.

  If seeking approval to use the variation rules, the BDAR must contain details of the reasonable steps that have been taken to obtain requisite like-for-like biodiversity credits.
- The BDAR must be submitted with all spatial data associated with the survey and assessment as per Appendix 11 of the BAM.
- The BDAR must be prepared by a person accredited in accordance with the *Accreditation Scheme for the Application of the Biodiversity Assessment Method Order 2017* under s.6.10 of the *Biodiversity Conservation Act 2016*.

Flooding

- 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.
- 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.
- The EIS must model the effect of the proposed development (including fill) on the flood behaviour under current flood behaviour for a range of design events as identified 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.

Flooding

- 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*.
- 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 river banks 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 or 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.

Soil and Water

- The EIS must map the following features relevant to water and soils including:
  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 s.4.2 of the Biodiversity Assessment Method).
  c. Wetlands as described in s.4.2 of the Biodiversity Assessment Method.
  d. Groundwater.
  e. Groundwater dependent ecosystems.
  f. Proposed intake and discharge locations.
- The EIS must describe background conditions for any water resource likely to be affected by the development, including:
  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/ieo/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. The *Risk-based Framework for Considering Waterway Health Outcomes in Strategic Land-use Planning Decisions* (OEH, 2017).
- The EIS must assess the impacts of the development on water quality, including:
  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).
- 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.

(END OF SUBMISSION)

26 October 2021

TfNSW Reference: SYD21/01257/01
Client Reference: SSD-29999239

The General Manager
Department of Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Bruce Zhang

REQUEST FOR SEARS - ROOTY HILL MATERIALS RECYCLING FACILITY - 600 WOODSTOCK AVENUE, ROOTY HILLS

Dear Sir/Madam,

Reference is made to Department of Planning and Environment's correspondence dated 14 October 2021 requesting Transport for NSW (TfNSW) to provide details of key issues and assessment requirements regarding the abovementioned development for inclusion in the Secretary's Environmental Assessment Requirements (SEARs).

TfNSW would like to request the applicant providing a transport and accessibility impact assessment, which includes, but is not limited to the following:

Key Issue Transport and Accessibility

- Details of all traffic types and volumes likely to be generated by the proposed development during construction and operation, including predicted haulage routes, including over size over mass vehicles, and consider any impacts to the state road network (i.e. where the haulage route meets the state road);
- Daily inbound and outbound traffic profile by time of day and day of week broken down per vehicle types;
- Details of the origin/destination of dangerous goods movements to/from the site (if any)
- Detailed plan site layout to demonstrate that the site will be able to accommodate the most productive vehicle types as well as the worst performing vehicles (sufficient loading/ unloading) and parking on site in accordance with the relevant Australian Standard and Council's Development Control Plan;
- Details of the driver facilities provided on site;
- Swept path diagrams to demonstrate the largest vehicles as well as the worst performing vehicles entering, exiting and manoeuvring throughout the site;
- An assessment of the predicted impacts of this traffic on road safety and the capacity of the road network, including consideration of cumulative traffic impacts at key intersections using SIDRA or similar traffic model. This is to include the

identification and consideration of approved and proposed developments/planning proposals/road upgrades in the vicinity. The assessment needs to include the following intersections;

  - Woodstock Avenue / Westlink M7 on-ramp and off-ramp
  - Woodstock Avenue / Kellogg Road

- Detailing how the proposed development connects to adjoining sites to facilitate their future development for their intended purposes;
- Traffic management plan on how to manage number of vehicles likely to be generated during construction and operation and awaiting loading, unloading or servicing that can be accommodated on the site to avoid queuing in the surrounding road network. This to demonstrate how internal and external traffic can be managed in conjunction with existing traffic on site;
- Detailed plans of the site access and proposed layout of the internal road and pedestrian network and parking on site in accordance with the relevant Australian Standards and Council's DCP;
- Swept path diagrams depicting vehicles entering, exiting and manoeuvring throughout the site;
- Details of road upgrades, infrastructure works, or new roads or access points required for the development;
- Details of travel demand management measures to minimise the impact on general traffic and bus operations, including details of a location-specific sustainable travel plan (Green Travel Plan and specific Workplace Travel Plan) and the provision of facilities to increase the non-car mode share for travel to and from the site;
- Details of the adequacy of existing public transport or any future public transport infrastructure within the vicinity of the site, pedestrian and bicycle networks and associated infrastructure to meet the likely future demand for the proposed development; and
- Measures to integrate the development with the existing/future public transport network.

Relevant Policies and Guidelines:

- Guide to Traffic Generating Developments (Roads and Maritime Services, 2002).
- NSW Freight and Ports Plans 2018-2023.
- Guidelines for Planning and Assessment of Road Freight Access in Industrial Areas.
- Cycling Aspects of Austroads Guides.
- NSW Planning Guidelines for Walking and Cycling (Department of Infrastructure, Planning and Natural Resources (DIPNR), 2004).
- Guide to Traffic Management Part 12: Integrated Transport Assessments for Developments (Austroads, 2020).
- Australian Standard 2890.3 Parking facilities, Part 3: Bicycle parking (AS 890.3).

If you have any further questions, Mr. Felix Liu would be pleased to take your call on 8849 2113 or email development.sydney@transport.nsw.gov.au. I hope this has been of assistance.

Yours sincerely,

Malgy Coman
Senior Land Use Planner

Our reference: DOC21/899344-3
Date: 19 October 2021

HERITAGE NSW – Aboriginal Cultural Heritage - SEARs

Project Name: Major Projects – New Request for Advice - Materials Recycling Facility, Rooty Hill (Blacktown)
SSD/I #: SSD-29999239

1. The EIS must identify and describe the Aboriginal cultural heritage values that exist across the whole area that will be affected by the development and document these in an Aboriginal Cultural Heritage Assessment Report (ACHAR). This may include the need for surface survey and test excavation. The identification of cultural heritage values must be conducted in accordance with the Code of Practice for Archaeological Investigation in NSW (DECCW 2010), and be guided by the Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in New South Wales (OEH 2011).
2. Consultation with Aboriginal people must be undertaken and documented in accordance with the Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW 2010). The significance of cultural heritage values for Aboriginal people who have a cultural association with the land must be documented in the ACHAR.
3. Impacts on Aboriginal cultural heritage values are to be assessed and documented in the ACHAR. The ACHAR must demonstrate attempts to avoid impact upon cultural heritage values and identify any conservation outcomes. Where impacts are unavoidable, the EIS must outline measures proposed to mitigate impacts. Any objects recorded as part of the assessment must be documented and notified to Heritage NSW.
4. The assessment of Aboriginal cultural heritage values must include a surface survey undertaken by a qualified archaeologist. The result of the surface survey is to inform the need for targeted test excavation to better assess the integrity, extent, distribution, nature and overall significance of the archaeological record. The results of surface surveys and test excavations are to be documented in the ACHAR.
5. The ACHAR must outline procedures to be followed if Aboriginal objects are found at any stage of the life of the project to formulate appropriate measures to manage unforeseen impacts.
6. The ACHAR must outline procedures to be followed in the event Aboriginal burials or skeletal material is uncovered during construction to formulate appropriate measures to manage the impacts to this material.

NOTE: The process described in the *Due Diligence Code of Practice for the protection of Aboriginal objects in NSW* (DECCW 2010) is not sufficient to assess the impacts on Aboriginal cultural heritage of Major Projects.

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OUT21/15385

Bruce Zhang
Planning and Assessment Group
NSW Department of Planning, Industry and Environment

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Dear Mr Zhang

Rooty Hill Materials Recycling Facility (SSD-29999239)
Comment on the Secretary's Environmental Assessment Requirements (SEARs)

I refer to your email of 14 October 2021 to the Department of Planning, Industry and Environment (DPIE) Water and the Natural Resources Access Regulator (NRAR) about the above matter.

The following recommendations are provided by DPIE Water and NRAR.

The SEARS should include:

- The identification of an adequate and secure water supply for the life of the project. This includes confirmation that water can be sourced from an appropriately authorised and reliable supply. This is also to include an assessment of the current market depth where water entitlement is required to be purchased.
- A detailed and consolidated site water balance.
- Assessment of impacts on surface and ground water sources (both quality and quantity), related infrastructure, adjacent licensed water users, basic landholder rights, watercourses, riparian land, and groundwater dependent ecosystems, and measures proposed to reduce and mitigate these impacts.
- Proposed surface and groundwater monitoring activities and methodologies.
- Consideration of relevant legislation, policies and guidelines, including the NSW Aquifer Interference Policy (2012), the Guidelines for Controlled Activities on Waterfront Land (2018) and the relevant Water Sharing Plans (available at https://www.industry.nsw.gov.au/water).

Any further referrals to DPIE Water and NRAR can be sent by email to landuse.enquiries@dpie.nsw.gov.au. or to the following coordinating officer within DPIE Water:

Alistair Drew, Project Officer- email: Alistair.drew@dpie.nsw.gov.au

Yours sincerely

Alistair Drew
Project Officer, Assessments
Water – Knowledge Office
18 October 2021