17 October 2023

Our Ref: F23/876
Our Contact: Christopher Lazaro (02) 9562 1627

Sally Munk
Industry Assessments
Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Ms Munk,

RE: Request for SEARs – 2-4 Hale Street, Botany – Waste Management Facility

Thank you for the opportunity to provide comment on the Planning Secretary's Environmental Assessment Requirements (SEARs) for the proposed Waste Management Facility at 2-4 Hale Street, Botany.

The Proposal

Council acknowledges that Coombes Property Group has contacted the Department of Planning and Environment (DPE) to request Project-Specific SEARs for a State Significant Development (SSD) application at 2-4 Hale Street, Botany. The application consists of the following:

- Demolition of existing buildings and hardstand area and construction of a waste management facility consisting of new hardstand, purpose-built warehouse, lunchroom, office and amenities. Key components include:
    - Estimated 300,000 tonnes per year
    - Building height: TBA
    - Combined GFA of 3,969.5sqm, consisting of:
        - Warehouse: 3,647sqm
        - Office: 260sqm
        - Gatehouse: 14.5sqm
        - Pump room: 48sqm
    - Vehicle access via Hale Street, including two new crossovers (one for cars and one for trucks)
    - On-grade car park of 14 spaces
    - In-ground weighbridges
    - Substation relocation
- CIV: TBA
- 24/7 hours operation

Bayside Council General Comments

Council requests that the following matters are addressed in any Environmental Impact Statement (EIS) which accompanies an SSD for the proposal:

- **Strategic and Statutory Planning Framework**

  The EIS must demonstrate that the development proposal is generally consistent with all relevant planning strategies, plans and Environmental Planning Instruments (EPIs), including:

  - Greater Sydney Region Plan – A Metropolis of Three Cities.
  - Eastern City District Plan.
  - Future Transport 2056.
  - Chapter 2 Infrastructure: SEPP (Transport and Infrastructure) 2021.
  - Chapter 5 Three Ports: SEPP (Transport and Infrastructure) 2021.
  - Chapter 4 Remediation of Land: SEPP (Resilience and Hazards) 2021.

Bayside Council Technical Comments

- **Built Form**

  1. The subject site is affected by the 15.24m building height Civil Aviation Regulation. The site is also located within the 10m-30m AHD zone on the OLS map. Buildings that exceed these heights will require a referral to Sydney Airport Corporation and/or Civil Aviation Safety Authority. The development may also require an assessment for mechanical windshear. Refer to Bayside Development Control Plan 2022 (Bayside DCP 2022) - Section 3.13 for further information.

  2. It is recommended that the development meets the following minimum boundary setbacks in accordance with section 6.4 of Bayside DCP 2022:

     - Front setback (landscape) – 3m
     - Front setback (building) – 9m
     - Side setback – 2m
     - Rear setback – 0-3m

     The development should also consider the setback requirements to the SWSOOS channel.

- **Traffic, Parking, Access and Public Domain**

  3. The Bayside DCP 2022 Section 3.5 specifies parking requirements for development of this type. General Industrial uses are required to provide the following car parking rates:

     - 2 spaces; or
     - 1 space / 80 sqm GFA, whichever is greater; plus
     - 1 space / 40 sqm GFA of ancillary office

4. A Traffic and Parking Impact Assessment Report is required for waste and resource management facilities applications and must include:

    a. Full details of the proposed operation (including maximum number of vehicles to be stored on-site and frequency of movements),

    b. Proposed vehicular access, off-street parking, vehicle storing area, pick-up/drop off zones, movements and manoeuvrability of all vehicles,

    c. Truck routes to and from the site (for the transport of vehicles),

    d. Details of any potential impacts on traffic and the road network system (including intersection performance analysis),

    e. Details of site access, road signs, pedestrian safety etc,

    f. Signal/warning system and passing bay requirement at vehicle intersection areas,

    g. Parking & manoeuvring of vehicles. The report should address adequacy of site and parking layout for the largest vehicle to be accessing the site,

    h. Traffic engineer shall certify the parking layout, access and visibility requirement for the proposed parking facility in accordance with AS/NZS 2890.1:2004, AS2890.2:2018, AS2890.3:2015 & AS/NZS 2890.6:2009,

    i. Construction traffic management concept plan,

    j. Details of the Traffic consultant and author of the report must be included.

5. Swept path analysis (using Autoturn software or similar) shall be provided (for B85 vehicle) for all parking spaces and demonstrate area required to manoeuvre vehicle in and out from the site and parking spaces in forward direction. A 300mm clearance shall be provided either side of the turning path.

6. Swept path analysis (using Autoturn software or similar) shall be provided for the largest service vehicle accessing the site and demonstrate the area required to manoeuvre vehicle around the site and exit in a forward direction.

7. An assessment and certificate from a qualified traffic engineer shall be provided demonstrating compliance with Australian Standards 2890 series for parking facility design, layout and access to the site.

8. A longitudinal profile of the driveway shall be provided incorporating the driveway ramp crest level protecting the basement from flooding as per any flood advice letter. Also a longitudinal profile is to be provided for the loading dock and internal ramps demonstrating compliance with the relevant Australian Standard.

9. A Traffic Study is required to be undertaken for the development by a qualified and experienced traffic engineer to assess the traffic impacts of the development. The study shall be undertaken in accordance with the RTA Guide to Traffic Generating Developments and shall include, but not be limited to, the following topics:

    a. Existing site conditions,

b. Route assignment, traffic flows and traffic generation (existing & future),

c. Intersection performance and levels of service (existing and future),

d. Traffic safety,

e. Access requirements – details shall be provided for existing access and proposed access for maximum safety of pedestrian and vehicles, and

f. Traffic and parking survey shall be done on peak period (not in school holidays) – two/Three typical days.

- **Stormwater Management**

10. A detailed Stormwater Management Plan and design certification must be prepared by an accredited professional. The following is considered to be acceptable accreditation for the purpose of the stormwater design and certification:

    a. Professional Civil Engineer (MIEAust) (Engineers Australia),

    b. NER in Civil Engineering,

    c. Surveyors Certificate of Accreditation in On-Site Detention and Drainage Design (Institute of Surveyors NSW and the Association of Consulting Surveyors NSW),

    d. Stormwater Register (Association of Hydraulic Services Consultants Australia), and

    e. Accreditation as a certifier under the Environmental Planning and Assessment Act 1979 in the relevant discipline.

11. The following must be provided:

    a. Detailed calculations and parameters used to define the storage volumes and discharge rates of the On-Site Detention (OSD) system,

    b. Calculations showing capacity of the internal drainage systems; overflow structures and overland flow paths/floodway (if applicable); location of any Council drainage easements and/or drainage system within and adjacent to the site,

    c. Design plans and details:

        i. Site layout,
        ii. Existing site contours and final design levels,
        iii. Catchment area draining to each OSD system,
        iv. Finished floor levels and footprints of the proposed development/ structures,
        v. Location and size of the internal and external drainage systems, rainwater re-use system and OSD systems,

Commented [DD1]: Scoping report mentioned flood storage tanks in lieu of OSD?

vi. Levels and location of discharge points for each OSD system,

vii. Maximum water surface levels in each storage,

viii. Overflow structures and surcharge/overflow paths,

ix. Locations and details of each discharge control unit (if any),

x. Location and extent of any overland flow path/ floodway through the site (if any),

xi. Location and type of pollution control devices, and

xii. Cross–sections details of the rainwater tanks and OSD systems.

Note: Given the location of the site at the low point for the catchment in a heavily flood affected area, flood storage tanks can be proposed in lieu of an OSD system.

12. The development requires the use of a Water Sensitive Urban Design Approach (WSUD) to the design of the drainage system. Bayside Technical Specification Stormwater Management requires development to confirm the targets for the stormwater pollution reduction and to justify the target by an analysis using MUSIC. Bayside Technical Specification Stormwater Management also outlines the stormwater reduction targets as follows:

Stormwater Pollutants	Reduction Target
Gross Pollutant	90%
Total suspended solids (TSS)	80%
Total Phosphorus (TP)	55%
Total Nitrogen (TN)	40%

13. WSUD modelling utilising MUSIC must be submitted along with the stormwater plans depicting compliance with the following:

a. Incorporation of a Stormwater Quality Improvement system to ensure compliance with Bayside Technical Specification Stormwater Management, and

b. The MUSIC model must be prepared in line with the NSW MUSIC Modelling Guidelines.

- **Flooding**

14. Council systems indicate that the site is 1% AEP flood affected. A Flood Advice Letter must be obtained from Council prior to lodging any development application for the property. The lodgement form for the Flood Advice Letter is provided below:

https://www.bayside.nsw.gov.au/sites/default/files/2023-06/flood_advice_application_form_2023-24.pdf

15. The development's habitable and non-habitable areas will need to be physically protected from inundation during the flooding event (including any basement and fire stairs). Furthermore, the flood impacts of the development footprint on the

floodplain need to be assessed using a 2D flood model through a recognised computer software. The form to obtain a copy of the flood modelling data is provided below:

https://www.bayside.nsw.gov.au/sites/default/files/2021-12/Model%20and%20Data%20Licence%20Agreement.pdf

16. The minimum habitable floor levels of the building will need to be set 500mm above the 1% AEP flood level. The minimum non-habitable floor levels of the building will need to be set 300mm above the 1% AEP flood level. Valuable materials subject to flood damage are to be stored at a level at least 500mm above the 1% AEP flood level.

17. A Flood Risk Management Plan is required for the development and shall be prepared by a suitably qualified civil engineer for the development that details evacuation procedures/methodology, warning signs and preservation of flood awareness as owners and/or occupants change through time.

18. The flood related controls and other flood related requirements that affect the site are detailed in Bayside DCP 2022 - Section 3.10 and Section 9.5. The development floor levels, flood impact and risk management must comply with the Bayside DCP 2022.

- **Landscaping**

19. A Landscape Plan prepared by a qualified professional shall be provided illustrating the final layout of open space, landscaped areas, paved areas, landscaping materials and plant species and groupings.

20. The development site shall include the following landscape elements:

    a. A minimum of 10% of the development site shall be landscaped. As the site is over 2,000 sqm, it is recommended that the front landscaped setback shall be additional to the 10% requirement.

    b. The site is in close proximity to the adjoining wetlands and subject to Chapter 2 Coastal Management of SEPP (Resilience and Hazards) 2021. The proposal must include WSUD elements designed to treat first flush and small storm event runoff (bioretention swale, rock lined swale, vegetated swales, porous/permeable pavements, storage of rainwater for irrigation raingardens etc.).

    c. Dense buffer planting shall be provided along the front of the site. The buffer shall include medium and large trees. All trees shall be native and indigenous species.

    d. Parking paved areas shall be balanced with canopy trees, to minimise the Urban Heat effect. It is recommended that Bayside DCP 2022 - Section 3.7.5 C1 is implemented, which requires that 1 tree be provided for every 5 car spaces to achieve at least 50% canopy coverage of the car park at maturity.

    e. Buffer planting is to be provided along side setbacks.

f. Any stormwater structures shall not be located within the deep soil landscape zones.

g. Please note that new street trees may be required to be planted as part of the Public Domain improvements.

- **Tree Management**

21. There are no trees of significance on the property or on the adjacent lots that are likely to be affected by the proposed development. However, a grove of eleven (11) *Casuarina cunninghamiana* (Swamp She Oak) trees are located along the front boundary and must be protected with a Tree Protection Zone.

    Consent must be sought for the removal of several *Casuarina cunninghamiana* (Swamp She Oak) to accommodate the proposed crossover. To offset the removal of the above listed trees, five (5) *Angophora costata* (Smooth Barked Apple) specimens will be required to be planted in the two locations of the existing redundant crossovers once the kerb has been removed.

- **Development near Critical Infrastructure**

Sydney Airport

22. The proposal must demonstrate it will not interfere with the operations of Sydney Airport. Potential interferences include building height, windshear, and lighting and reflectivity. The proposal shall consider the National Airports Safeguarding Framework guidelines when developing the scheme further. The proposal will require a referral to Sydney Airport.

Dangerous goods pipeline

23. The subject site is located within the notification zone for the *B Line BMT to JUHI* dangerous goods pipeline, operated by Caltex Australia Petroleum. The proposal will require a referral to this organisation.

SWSOOS

24. The Southern and Western Suburbs Ocean Outfall Sewer (SWSOOS) runs along both the northern and western boundary of the site. Development will need to be responsive to the constraints enacted by the SWSOOS, including a development buffer of at least 3m. A referral to Sydney Water is required.

- **Amenity Impacts**

25. An Acoustic Report undertaken by a suitably qualified acoustic consultant must be provided to demonstrate that noise and vibration emissions from the operation of the development will comply with the relevant provisions of the Protection of the Environment Operations Act 1997, and the Noise Policy for Industry 2017.

    Consideration must be given to the nearby residential properties, particularly No. 3 Luland Street, Botany. There are also several residential properties along the northern side of Erith Street to the north-east of the site.

26. A Plan of Management (POM) shall accompany any future application and include all details relevant to the operation of the premises. The POM must include recommendations from any relevant technical reports.

- **Environmental Impacts**

27. Chapter 2 Coastal Management and Chapter 4 Remediation of Land of SEPP (Resilience and Hazards) 2021, apply to the development and must be considered in its assessment. The consent authority must be satisfied that the land is suitable, either in its contaminated state or after remediation, for the proposed use.

28. The site is affected by Acid Sulfate Soils (ASS) Class 2. An Acid Sulfate Soils Management Plan shall be submitted to determine the likelihood of ASS present on site.

29. Plans of the warehouse and any chemical storage areas must demonstrate compliance with bunding requirements and how waste liquids are to be stored if generated onsite. Wash bays must be bunded and connected to the sewer. Permission to discharge trade wastewater agreement with Sydney Water is also required.

30. An Air Quality Impact Assessment is required to determine any mitigation measures needed to ensure dust and particulate matter does not cause environmental impacts on the area.

31. A diesel fuel storage facility is shown on the plans. The fuel tank shall comply with the Protection of the Environment Operations (Underground Petroleum Storage Systems) Regulation 2019, Protection of the Environment Operations Act 1997 and Australian Standard AS4897-2008: Design, installation and operation of underground petroleum storage systems. Installation of the fuel tanks shall comply with Australian Standard AS1940:2017 The Storage and Handling of Flammable and Combustible Liquids, and shall be licensed by SafeWork NSW prior to the occupation of the premises.

We trust that the Department will carefully consider Council's input in preparing the final SEARs for this project.

If you require any further information please do not hesitate to contact Christopher Lazaro, Senior Urban Planner on (02) 9562 1627 or via email: christopher.lazaro@bayside.nsw.gov.au.

Yours sincerely,

Ana Trifunovska
Acting Coordinator Planning Policy

From:	Alder, David
To:	Sally Munk
Cc:	Airspace Protection
Subject:	RE: F23/23053-45 Proposed Waste Management Facility, Botany - SSD-62855708 - Request for Input to SEARs CASA Comments [SEC=OFFICIAL]
Date:	Wednesday, 4 October 2023 3:16:00 PM
Attachments:	image001.png image002.png image003.png image004.png image005.png image006.png image007.png image008.png image009.png image010.png image011.png image012.png

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OFFICIAL

Sally

Extracts from the Scoping Report:
"*An aviation consultant has been engaged to undertake an assessment of the constraints imposed by the protected airspace at Sydney Airport. This will inform the maximum building heights on the site as well as other design and operational considerations such as lighting and dust*."

"An aviation consultant has been engaged and has undertaken a preliminary airspace impact assessment of the constraints imposed by the protected airspace at Sydney Airport, which has informed the maximum building heights on the site. A full airspace impact assessment will be undertaken for the EIS and will take into account other design parameters and potential impacts such as construction methodology, including the use of cranes."

"*The air quality assessment will interface with the aviation risk assessment to understand how wind-blown dust from the site may present a risk to aviation*."

CASA agrees that height, lighting and dust should be addressed in the EIS.

Further, for developments in the vicinity of aerodromes CASA recommends that Planning Authorities consider the relevant National Airports Safeguarding Framework (NASF) Guidelines (as described at page 25/26 of the Scoping Report). A sweep through the Guidelines serves as a rudimentary checklist. Dust does not feature in the NASF Guidelines, but aircraft will be approaching runway 16L at very approximately 40 – 50m above ground level and taking off (normally higher) adjacent to the site, and there are maintenance facilities on the airport; therefore dust suppression is important.

Guideline A: Measures for Managing Impacts of Aircraft Noise

Aircraft noise issues are addressed in the Scoping Study 6.1.2. To be sure; CASA does not assess, or provide comment on, potential noise issues. CASA has no regulatory responsibilities regarding aircraft noise. It is a matter for the Planning Authority.

Guideline B: Managing the Risk of Building Generated Windshear and Turbulence at Airports

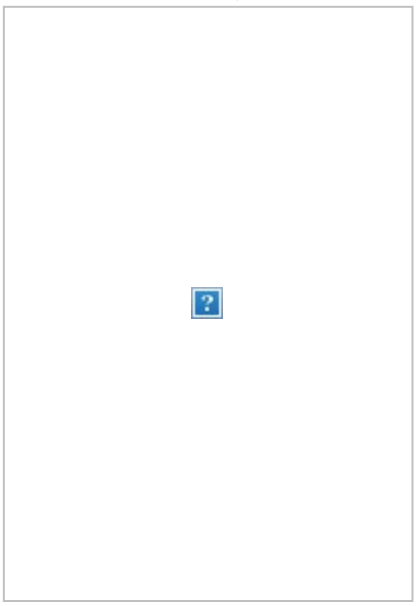
The development is within the assessment zone (0.65km <0.9km and 0.25km<1.2km). The 1:35 rule will need to be checked. There may be a requirement for a specialist building generated wind effects (windshear and turbulence) assessment, possibly using a wind tunnel or Computational Fluid Dynamics; depending on the size and shape of the proposed structures.

Guideline C: Managing the Risk of Wildlife Strikes in the Vicinity of Airports

Also: CASA Advisory Circular (AC) 139-26(0) - Wildlife Hazard Management at Aerodromes.
Bird (especially) and animal attractors should be avoided. 'Biodiversity' may need to be sacrificed.
For example (refer also to the above documents):
Putrescible waste processing should be avoided. Small amounts should be stored in closed containers.
Landscaping should avoid use of trees and shrubs attractive to birds and bats.
Avoid bird perching opportunities where practicable.

Guideline E: Managing the Risk of Distractions to Pilots from Lighting in the Vicinity of Airports

Lighting is briefly addressed in the Scoping Study 3.3. NASF Guidance is provided for situations where lights are to be installed within a 6 km radius of an aerodrome. Within this large area there is a primary area which is divided into four light control zones: A, B, C and D where specific maximum intensities of light sources measured at 3° above the horizontal are recommended. The site could be in zone A. The main aim is not to have security / street lights etc 'shining/spilling upwards' and not to have green or red or white arrays of lights that could be confused with threshold or runway end or runway side lights respectively.



Guideline F: Managing the Risk of Intrusions into the Protected Airspace of Airports

Covered in the Scoping Study 6.1.5 and page 25. Tall construction cranes will also need to be considered (Scoping Study 3.5.2). Sydney Airport will be able to advise heights of Obstacle Limitation Surfaces.

Guideline G: Protecting Aviation Facilities — Communications, Navigation and Surveillance (CNS)

Airservices Australia (Airport Developments) would review any proposed communication facilities that could affect aviation related communications/navigation….as described in the Scoping Study

page 30/31.

Guideline H: Protecting Strategically Important Helicopter Landing Sites

The site is not near a hospital helipad. Guideline H is not applicable in this case.

Guideline I - Managing the Risk in Public Safety Areas At The Ends Of Runways

CASA doesn't normally provide advice regarding Public Safety Zones. The Guideline is an option for the Planning Authority and the Airport. However, as a guide, the proposed development would not impact the sample representative Queensland PSA described in NASF Guideline I.

Other Aspects:
It is assumed that there are no furnaces. If there is going to be a furnace, CASA can assess the plume, given specific details. Smoke could also be an issue.

If the aspects described above are not covered in the EIS, the EIS should at least explain why not.

I trust that the above will inform SEARs content. Please advise if you need a more concise submission from this office.

Regards
David Alder
Aerodrome Engineer
Aerodrome Developments and Airspace Protection
Air Navigation, Airspace and Aerodromes Branch
p: 02 6217 **1342** **m:** 0455 051 611
16 Furzer Street, Phillip ACT 2606
GPO Box 2005, Canberra ACT 2601
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From: Sally Munk <Sally.Munk@planning.nsw.gov.au>
Sent: Friday, September 29, 2023 11:27 AM
To: Airport Developments <Airport.Developments@AirservicesAustralia.com>; Airspace Protection <Airspace.Protection@casa.gov.au>; DPE PSVC Hazards Mailbox <hazards@planning.nsw.gov.au>; OEH HD Heritage Mailbox <HERITAGEMailbox@environment.nsw.gov.au>; LANDS <lands@jemena.com.au>; Laura Locke <Laura.Locke@planning.nsw.gov.au>; Airspace Protection <AirspaceProtection@syd.com.au>; urbangrowth@sydneywater.com.au; development@ausgrid.com.au
Subject: Proposed Waste Management Facility, Botany - SSD-62855708 - Request for Input to SEARs

The Department of Planning and Environment has received a request for Secretary's Environmental Assessment Requirements (SEARs) from Coombes Property Group for a Waste

Management Facility, Botany. The proposed development is a State Significant Development under the *Environmental Planning and Assessment Act 1979.*

The Applicant proposes to construct and operate a waste transfer station with a capacity to process up to 300,000 tpa of construction and demolition waste, including new hardstand, purpose built warehouse, office and amenities, and two new crossovers.

The scoping report for the proposal may be viewed on the project page at: https://www.planningportal.nsw.gov.au/major-projects/projects/waste-management-facility-botany

Your organisation is invited to provide input into the SEARs for the proposal including details of any key issues and assessment requirements by **Thursday 12 October 2023.**

If you have any enquiries, please contact me directly

Regards
Sally

Sally Munk
Principal Planner
Industry Assessments
Department of Planning and Environment

T (02) 9274 6431 **E** sally.munk@planning.nsw.gov.au

4 Parramatta Square, 12 Darcy Street, Parramatta | Locked Bag 5022, Parramatta NSW 2124

dpie.nsw.gov.au

I acknowledge the traditional custodians of the land and pay respects to Elders past and present. I also acknowledge all the Aboriginal and Torres Strait Islander staff working with NSW Government at this time.

Ms Sally Munk
Principal Planning Officer
Industry Assessments
Department of Planning and Environment
Locked Bag 5022
Parramatta NSW 2150

Notice Number	1633708
File Number	SSD-62855708
Date	09-Oct-2023

KLF Recycling Hornsby Pty Ltd

ABN 27 159 956 359

Dear Ms Munk

RE: Development of a Construction and Demolition (C&D) Waste Management Facility at 2-4 Hale Street, Botany NSW 2019 by Coombes Property Group and KLF Group

I refer to your request on 29 September 2023 to the Environment Protection Authority's (EPA) for key issues and assessment requirements to incorporate into the Secretary's Environmental Assessment Requirements (SEARs) for the construction of a proposed C&D Waste Management Facility at Lot 1 DP562374, also known as 2-4 Hale Street, Botany NSW 2019 (the Premises).

The EPA understands that Coombes Property Group (the Applicant) is seeking approval to construct a C&D Waste Management Facility at the Premises to enable the following:

- to accept up to 300,000 tonnes per annum of C&D waste; and
- to operate as a waste transfer station undertaking receipt, basic sorting and recycling with aggregation of material.

The EPA has considered the details of the Proposal as provided within the scoping report titled 'Coombes Property Group & KLF Group - Waste Management Facility, Botany Scoping Report' prepared by EME Advisory Pty Ltd on behalf of the applicant and dated 22 September 2023 (Scoping Report). The EPA has

identified the information it requires to issue recommended conditions in **Attachments A & B**. In summary, the EPA's key issues and assessment requirements for the Proposal are:

1. Waste management;
2. Water management;
3. Air quality; and
4. Noise.

In carrying out the assessment, the Applicant should refer to the relevant guidelines as listed in **Attachment C** and any relevant industry codes of practice and best practice management guidelines.

The Applicant should be made aware that any commitments made in the environmental assessment may be formalised as approval conditions and may also be placed as formal Environmental Protection Licence (EPL) conditions.

The Applicant should be made aware that, consistent with provisions under Part 9.4 of the *Protection of the Environment Operations Act 1997* (the Act) the EPA may require the provision of a Financial Assurance amount under the Licence. The FA amount, if required, would be determined by the EPA in accordance with the Act and the EPA Guidelines on Estimating Financial Assurances (*https://www.epa.nsw.gov.au/licensing-and-regulation/legislation-and-compliance/policies-and-guidelines/financial-assurance).*

In addition, as a requirement of an EPL, the EPA will require the Applicant to prepare, test and implement a Pollution Incident Response Management Plan and/or Plans in accordance with Section 153A of the Act.

Please note that the EPA has not considered Aboriginal culture heritage, biodiversity or built form/urban design requirements as these are the purview of the Environment, Energy and Science Group within the Department of Planning and Environment.

Yours sincerely,

.....

Rashad Danoun

A/ Unit Head

Environment Protection Authority

(by Delegation)

ATTACHMENT A: Site Specific Requirements

1. The facility must be enclosed

The EPA requires that all waste and materials are stored and processed inside an enclosed building. All waste and material handling activities, including receipt, sorting, processing, sampling, quarantine, storage, treatment, loading and unloading must be conducted within a fully enclosed building.

No waste or materials, including finished products, may be stored outside. All used external surfaces, including any external haulage areas or roads, must be sealed hardstand. Any unused external surfaces must be sealed hardstand or vegetated.

The EPA notes that the scoping report states that indoor activities will take place at the Premises in a fully enclosed warehouse. These activities include unloading, sorting, stockpiling and reloading for dispatch to other facilities. The scoping report also states that outdoor activities are limited to incoming and outgoing truck movements, weighbridge activities and vehicle washdown.

2. Site plan

A detailed site plan of the Premises must be included in the Environmental Impact Statement (EIS). The site plan must identify at the minimum, but is not limited to:

- location of the facility;
- traffic flows and directions;
- haulage;
- infrastructure for waste receipt, processing, storage, and loading (for each waste and material type);
- quarantine;
- infrastructure for environmental controls including dust, noise, water, odour, and wheel wash;
- weighbridges;
- site boundaries;
- stormwater drainage areas;
- unused stabilised areas;
- machinery storage areas;

- areas under the *Standards for managing construction waste in NSW* (the Standards) (if applicable)

- any dangerous goods, hazardous goods and/or chemical storage areas (including any fuel storage areas); and

- bunding.

3. Authorised Amount

The EPA notes from the Scoping Report that the Applicant proposed to accept up to 300,000 tonnes per annum of C&D waste at the Premises and to store between 6,000 and 10,000 tonnes at any one time (subject to further analysis).

The Applicant must indicate in the EIS the maximum amount of waste to be stored at any one time (i.e. the Authorised Amount) and provide sufficient evidence that this amount of waste can be managed appropriately at the Premises. In order for the EPA to determine the reasonableness of the proposed Authorised Amount, the Applicant must provide all details it has considered when determining the proposed Authorised Amount (e.g. stockpile heights, bulk density, etc.) Regarding stockpile heights, the Applicant should be aware that the EPA generally does not permit a maximum height of greater than 4 metres to ensure potential environmental impacts are minimised. The EPA recommends the Applicant take this into consideration when justifying its proposed Authorised Amount.

4. Waste and material management

The EPA notes from the Scoping Report that the Applicant intends to accept general solid waste as defined in the Act and the Waste Classification Guidelines Part 1: Classifying Waste (EPA 2014a). The EIS must include a detailed assessment of the waste and material management processes to be undertaken at the Premises. This includes but is not limited to:

- details of the sources of each waste type to be received at the Premises;

- details of the type and quantities of each type of waste to be received at the Premises;

- details of the maximum volume of each waste type and the total maximum volume of waste to be stored at the Premises at any one time;

- details of the maximum annual throughput of each waste type and the total maximum throughput to be processed at the Premises;

- a detailed description of receipt, processing, and storage, and loading procedures for each waste type;

- a description of how the Applicant will meet the EPA's record keeping and reporting requirements, including weighing material in and out of the Premises (refer to the EPA's Waste Levy Guidelines for more information - available at: https://www.nsw.gov.au/your-environment/waste/waste-levy);

- details of the type and quantities of materials to be produced and their intended fate;
- the intended fates of all other waste and materials received/produced on site which are not suitable for re-use;
- details of any materials produced under a Resource Recovery Order, and the controls/procedures in place for meeting the conditions of that order;
- details of any materials produced which will require a specific Resource Recovery Order;
- a description of procedures for dealing with non-conforming waste and materials (i.e. waste not permitted to be received at the Premises);
- details of any testing/monitoring procedures;
- details of storage for unprocessed and processed waste including the maximum storage capacity for each type of stored waste (the EPA notes each type of waste stored on site for recovery/recycling must be stockpiled separately); and
- details of how materials segregation will be achieved, particularly the segregation of contaminated soils and resource recovery materials.

5. Waste and material types

The EPA requires details information on the waste types proposed to be received at the Premises. For each waste type, the EIS must detail the physical and chemical content of the waste/materials, the types of pollution which may result from the storage and processing of that waste/material, and mitigation measures for managing any such impacts.

The EIS must explicitly identify each individual type of waste which will be received at the facility, with reference to the EPA's *Waste Classification Guidelines* and the definitions in Schedule 1 of the Act.

6. Excavated Natural Material

The EPA notes that the Scoping Report references Excavated Natural Material (ENM) as an outgoing waste. The Applicant should be aware that ENM cannot be created from other soils. The ENM exemption 2014 specifically sets that ENM is naturally occurring rock and soil that has been excavated from the ground and explicitly states it cannot have been processed.

7. Wastewater management

The EIS must include details of how wastewater at the facility will be managed. This includes but is not limited to:

- storage, treatment, sampling and disposal;

- mitigation measures proposed to be implemented to prevent and mitigate leaks and spills from on site activities:

    - appropriate primary and secondary containment systems should be included;

    - details of bunding, isolation, overflow prevention and other controls should be prioritised to demonstrate spill and leak related risks have been appropriately considered and addressed; and

    - detailed information regarding any trade waste agreements in place with Sydney Water.

8. Water management

It is considered best practice by the EPA for facilities to retain all water on site and not discharge any water in order to limit pollution and contamination. The EPA requires the Applicant first demonstrate that all practical and reasonable alternatives to discharge have been considered and implemented before other options are reviewed. Where discharge of polluted water is unavoidable, the Applicant must:

- identify all pollutants that pose a risk of non-trivial harm and the potential impact of those pollutants on the environment;

- implement all practical measures that can be taken to prevent, control, abate or mitigate the pollution and protect the environment from harm;

- consider the environmental values of water affected by the proposed discharge; and implement all practical measures that can be taken to restore or maintain those values.

An assessment of impacts to water, during both construction and operation, must be included in the EIS. This must include at a minimum:

- characterisation of any proposed discharges from the Premises (both volume and quantity);

- assessment of the potential impacts from these discharges; and

- proposed mitigation measures to manage any impacts (discharges includes, but is not limited to, stormwater (contaminated and uncontaminated), and wastewater (such as from dewatering)).

The Scoping Report advises that a stormwater assessment will be undertaken by an engineer to d as the Premises is located at a low point for the catchment in a flood affected area. Detailed information regarding the management of stormwater during both construction and operation must be included in the EIS. Details must be provided of any trade waste agreements which are (or are proposed to be) in place with Sydney Water. Sufficient evidence must be provided that the proposed systems will be capable of adequately managing stormwater. This includes a thorough integrity assessment of the proposed stormwater system to demonstrate its adequacy and suitability.

The waste management warehouse building must be constructed to exclude all stormwater and internal

surfaces be graded inwards to contain any contaminated water (being any water that has come into contact with waste or other materials which have the potential to cause contamination). The EPA notes even where all waste activities are conducted within a fully enclosed building, materials may be tracked on to external surfaces leading to the generation of contaminated water. Any external areas where vehicles travel or wait for loading/unloading must drain to a stormwater quality treatment device sufficient to remove any contaminants, both solid and dissolved, prior to discharge offsite.

9. Air Quality

The EIS must include an assessment of air quality which identifies all potential air emissions from the Premises during construction and operation, including, but not limited to, coarse particulates, PM10, PM2.5 and odour. The Applicant must assess the impact of these discharges and demonstrate effective control of all identified air emissions from the Premises.

Note: In relation to air impacts, all sensitive receivers need to be considered when conducting air quality and odour impact assessments. A sensitive receiver includes a place where someone works. Therefore, any industrial neighbours to the Premises must be included as sensitive receivers.

10. Noise

The EIS must include an assessment of noise impacts during construction and operation and demonstrate effective controls to manage noise impacts, including from increased traffic, at all receptors.

Note: In relation to noise impacts, all sensitive receivers need to be considered when conducting air quality and odour impact assessments. A sensitive receiver includes a place where someone works. Therefore, any industrial neighbours to the Premises must be included as sensitive receivers.

11. Dangerous goods and chemical transport, storage and handling

The EIS must outline all details regarding the transport, handling, storage and use of dangerous goods, chemicals, and products, including fuel, both on site and with ancillary activities and describe the measures proposed to minimise the potential for leakage or the migration of pollutants into the air, land or waters from the Premises. If fuel is intended on being stored at the Premises, any fuel storage areas must be undercover and bunded. The EIS must include details of emergency management procedures, including but not limited to spills of chemicals or restricted, hazardous, and/or liquid waste stored on the Premises.

12. Materials tracking

Best practice waste facilities install and utilise and wheel wash to reduce the risk of contaminants being tracked onto public roads. The EPA requires a wheel wash, and consideration of any other reasonable and feasible mitigation measures, to be included as part of the Proposal to reduce the risk of tracking of material and contaminants onto public roads. The EPA intends to recommend a condition which requires the Applicant to ensure that no material is tracked off the Premises.

13. Weighbridge

Scheduled (licensed) waste facilities are levy liable in accordance with section 88 of the POEO Act. As such, the Proposal must include a weighbridge in order to comply with the requirements of the waste levy.

14. Occupier/owner of the Premises

Sufficient evidence must be provided that the Applicant is the lawful occupier and/or owner of the Premises as the EPA cannot issue an EPL if this has not been provided.

15. Scheduled/ancillary activities

The EIS must identify all scheduled activities under Schedule 1 of the POEO Act for which an EPL will be required. Activities which will be conducted at the Premises which are ancillary to the scheduled activities must also be identified.

16. Standards for managing construction waste

The Applicant should be aware that the *Protection of the Environment Operations (Waste) Regulation* legislates the Standards. The Standards apply to all facilities receiving construction and demolition waste regardless of when approval was/is given for the facility. If the Applicant intends on receiving construction and demolition waste, the EIS must provide detailed information as to how compliance with the Standards will be achieved. The Applicant should be aware of all the legislative requirements relating to the Standards. The Standards are available at:

https://www.epa.nsw.gov.au/your-environment/waste/industrial-waste/construction-demolition/construction-and-demolition-waste

17. Fire Safety Guidelines

Fire and Rescue NSW have developed guidelines regarding fire safety within waste facilities titled '*Fire safety guideline – Fire safety in waste facilities*' (**the Fire Safety Guidelines**). The Fire Safety Guidelines are applicable to any waste facility within NSW involved in the storage, processing or resource recovery of combustible waste material. The EIS must demonstrate how the Proposal will ensure compliance with the Fire Safety Guidelines and include details on the specific mitigation measures that will be implemented to minimise fire risk at the Premises. The Fire Safety Guidelines are
available at:

https://www.fire.nsw.gov.au/gallery/files/pdf/guidelines/guidelines_fire_safety_in_waste_facilities.pdf

Note: Refer to **Attachment B** for further detail regarding what is to be included in the environmental assessments.

ATTACHMENT B: General requirements for the proposal

How to use these requirements

The EPA requirements have been structured in accordance with the DPE EIS Guidelines, as follows. It is suggested that the EIS follow the same structure:

A. Executive summary

B. The proposal

C. The location

D. Identification and prioritisation of issues

E. The environmental issues

F. List of approvals and licences

G. Compilation of mitigation measures

H. Justification for the proposal

A Executive summary

The executive summary should include a brief discussion of the extent to which the proposal achieves identified environmental outcomes.

B The proposal

1. Objectives of the proposal

- The objectives of the proposal should be clearly stated and refer to:
  a) the size and type of the operation, the nature of the processes and the products, by-products and wastes produced
  b) a life cycle approach to the production, use or disposal of products
  c) the anticipated level of performance in meeting required environmental standards and cleaner production principles
  d) the staging and timing of the proposal and any plans for future expansion
  e) the proposal's relationship to any other industry or facility.

2. Description of the proposal

General

- Outline the production process including:

  a) the environmental "mass balance" for the process – quantify in-flow and out-flow of materials, any points of discharge to the environment and their respective destinations (sewer, stormwater, atmosphere, recycling, landfill etc)

  b) any life-cycle strategies for the products.

- Outline cleaner production actions, including:

  a) measures to minimise waste (typically through addressing source reduction)

  b) proposals for use or recycling of by-products

  c) proposed disposal methods for solid and liquid waste

  d) air management systems including all potential sources of air emissions, proposals to re-use or treat emissions, emission levels relative to relevant standards in regulations, discharge points

  e) water management system including all potential sources of water pollution, proposals for re-use, treatment etc, emission levels of any wastewater discharged, discharge points, summary of options

explored to avoid a discharge, reduce its frequency or reduce its impacts, and rationale for selection of option to discharge.

f) soil contamination treatment and prevention systems.

- Outline construction works including:

a) actions to address any existing soil contamination

b) any earthworks or site clearing; re-use and disposal of cleared material (including use of spoil on-site)

c) construction timetable and staging; hours of construction; proposed construction methods

d) environment protection measures, including noise mitigation measures, dust control measures and erosion and sediment control measures.

- Include a site diagram showing the site layout and location of environmental controls.

Air

- Identify all sources or potential sources of air emissions from the development.
  Note: emissions can be classed as either:
  - *point (e.g. emissions from stack or vent) or*
    - *fugitive (from wind erosion, leakages or spillages, associated with loading or unloading, conveyors, storage facilities, plant and yard operation, vehicle movements (dust from road, exhausts, loss from load), land clearing and construction works).*

- Provide details of the project that are essential for predicting and assessing air impacts including:

a) the quantities and physio-chemical parameters (e.g. concentration, moisture content, bulk density, particle sizes etc) of materials to be used, transported, produced or stored

b) an outline of procedures for handling, transport, production and storage

c) the management of solid, liquid and gaseous waste streams with potential to generate emissions to air.

Noise and vibration

- Identify all noise sources or potential sources from the development (including both construction and operation phases). Detail all potentially noisy activities including ancillary activities such as transport of goods and raw materials.

- Specify the times of operation for all phases of the development and for all noise producing activities.

- For projects with a significant potential traffic noise impact provide details of road alignment (include gradients, road surface, topography, bridges, culverts etc), and land use along the proposed road and measurement locations – diagrams should be to a scale sufficient to delineate individual residential blocks.

Water

- Provide details of the project that are essential for predicting and assessing impacts to waters including:

  a) the quantity and physio-chemical properties of all potential water pollutants and the risks they pose to the environment and human health, including the risks they pose to Water Quality Objectives in the ambient waters (as defined on http://www.environment.nsw.gov.au/ieo/index.htm, using technical criteria derived from *the Australian and New Zealand Guidelines for Fresh and Marine Water Quality*, ANZECC 2000)

  b) the management of discharges with potential for water impacts

  c) drainage works and associated infrastructure; land-forming and excavations; working capacity of structures; and water resource requirements of the proposal.

- Outline site layout, demonstrating efforts to avoid proximity to water resources (especially for activities with significant potential impacts e.g. effluent ponds) and showing potential areas of modification of contours, drainage etc.

- Outline how total water cycle considerations are to be addressed showing total water balances for the development (with the objective of minimising demands and impacts on water resources). Include water requirements (quantity, quality and source(s)) and proposed storm and wastewater disposal, including type, volumes, proposed treatment and management methods and re-use options.

Waste and chemicals

Provide details of the quantity and type of both liquid waste and non-liquid waste generated, handled, processed or disposed of at the premises. Waste must be classified according to the EPA's *Waste Classification Guidelines 2014 (as amended from time to time)*

- Provide details of liquid waste and non-liquid waste management at the facility, including:

  a) the transportation, assessment and handling of waste arriving at or generated at the site

  b) any stockpiling of wastes or recovered materials at the site

  c) any waste processing related to the facility, including reuse, recycling, reprocessing (including composting) or treatment both on- and off-site

  d) the method for disposing of all wastes or recovered materials at the facility

  e) the emissions arising from the handling, storage, processing and reprocessing of waste at the facility

  f) the proposed controls for managing the environmental impacts of these activities.

- Provide details of spoil disposal with particular attention to:

  a) the quantity of spoil material likely to be generated

  b) proposed strategies for the handling, stockpiling, reuse/recycling and disposal of spoil

  c) the need to maximise reuse of spoil material in the construction industry

  d) identification of the history of spoil material and whether there is any likelihood of contaminated material, and if so, measures for the management of any contaminated material

  e) designation of transportation routes for transport of spoil.

- Provide details of procedures for the assessment, handling, storage, transport and disposal of all hazardous and dangerous materials used, stored, processed or disposed of at the site, in addition to the requirements for liquid and non-liquid wastes.

- Provide details of the type and quantity of any chemical substances to be used or stored and describe arrangements for their safe use and storage.

- Reference should be made to the guidelines: EPA's *Waste Classification Guidelines 2014 (as amended from time to time)*

ESD

- Demonstrate that the planning process and any subsequent development incorporates objectives and mechanisms for achieving ESD, including:

  a) an assessment of a range of options available for use of the resource, including the benefits of each option to future generations & proper valuation and pricing of environmental resources, and

  b) identification of who will bear the environmental costs of the proposal.

3. Rehabilitation

- Outline considerations of site maintenance, and proposed plans for the final condition of the site (ensuring its suitability for future uses).

4. Consideration of alternatives and justification for the proposal

- Consider the environmental consequences of adopting alternatives, including alternative:

  a) sites and site layouts

  b) access modes and routes

  c) materials handling and production processes

  d) waste and water management

  e) impact mitigation measures

  f) energy sources

- Selection of the preferred option should be justified in terms of:
  a) ability to satisfy the objectives of the proposal

b) relative environmental and other costs of each alternative

c) acceptability of environmental impacts and contribution to identified environmental objectives

d) acceptability of any environmental risks or uncertainties

e) reliability of proposed environmental impact mitigation measures

f) efficient use (including maximising re-use) of land, raw materials, energy and other resources.

C The location

1. General

- Provide an overview of the affected environment to place the proposal in its local and regional environmental context including:

  a) meteorological data (e.g. rainfall, temperature and evaporation, wind speed and direction)

  b) topography (landform element, slope type, gradient and length)

  c) surrounding land uses (potential synergies and conflicts)

  d) geomorphology (rates of landform change and current erosion and deposition processes)

  e) soil types and properties (including erodibility; engineering and structural properties; dispersibility; permeability; presence of acid sulphate soils and potential acid sulphate soils)

  f) ecological information (water system habitat, vegetation, fauna)

  g) availability of services and the accessibility of the site for passenger and freight transport.

2. Air

- Describe the topography and surrounding land uses. Provide details of the exact locations of dwellings, schools and hospitals. Where appropriate provide a perspective view of the study area such as the terrain file used in dispersion models.

- Describe surrounding buildings that may effect plume dispersion.

- Provide and analyse site representative data on following meteorological parameters:

  a) temperature and humidity

  b) rainfall, evaporation and cloud cover

  c) wind speed and direction

d) atmospheric stability class

e) mixing height (the height that emissions will be ultimately mixed in the atmosphere)

f) katabatic air drainage

g) air re-circulation.

3. Noise and vibration

- Identify any noise sensitive locations likely to be affected by activities at the site, such as residential properties, schools, churches, and hospitals. Typically the location of any noise sensitive locations in relation to the site should be included on a map of the locality.

- Identify the land use zoning of the site and the immediate vicinity and the potentially affected areas.

4. Water

Describe the catchment including proximity of the development to any waterways and provide an assessment of their sensitivity/significance from a public health, ecological and/or economic perspective. The Water Quality and River Flow Objectives on the website: http://www.environment.nsw.gov.au/ieo/index.htm should be used to identify the agreed environmental values and human uses for any affected waterways. This will help with the description of the local and regional area.

5. Soil Contamination Issues

- Provide details of site history – if earthworks are proposed, this needs to be considered with regard to possible soil contamination, for example if the site was previously a landfill site or if irrigation of effluent has occurred.

D Identification and prioritisation of issues / scoping of impact assessment

- Provide an overview of the methodology used to identify and prioritise issues. The methodology should take into account:

  a) relevant NSW government guidelines

  b) industry guidelines

  c) EISs for similar projects

  d) relevant research and reference material

  e) relevant preliminary studies or reports for the proposal

  f) consultation with stakeholders.

- Provide a summary of the outcomes of the process including:

  a) all issues identified including local, regional and global impacts (e.g. increased/ decreased greenhouse emissions)

  b) key issues which will require a full analysis (including comprehensive baseline assessment)

  c) issues not needing full analysis though they may be addressed in the mitigation strategy

  d) justification for the level of analysis proposed (the capacity of the proposal to give rise to high concentrations of pollution compared with the ambient environment or environmental outcomes is an important factor in setting the level of assessment).

E The environmental issues

1. General

- The potential impacts identified in the scoping study need to be assessed to determine their significance, particularly in terms of achieving environmental outcomes, and minimising environmental pollution.

- Identify gaps in information and data relevant to significant impacts of the proposal and any actions proposed to fill those information gaps so as to enable development of appropriate management and mitigation measures. This is in accordance with ESD requirements.

  Note: The level of detail should match the level of importance of the issue in decision making which is dependent on the environmental risk.

Describe baseline conditions

- Provide a description of existing environmental conditions for any potential impacts.

Assess impacts

- For any potential impacts relevant for the assessment of the proposal provide a detailed analysis of the impacts of the proposal on the environment including the cumulative impact of the proposal on the receiving environment especially where there are sensitive receivers.

- Describe the methodology used and assumptions made in undertaking this analysis (including any modelling or monitoring undertaken) and indicate the level of confidence in the predicted outcomes and the resilience of the environment to cope with the predicted impacts.

- The analysis should also make linkages between different areas of assessment where necessary to enable a full assessment of environmental impacts e.g. assessment of impacts on air quality will often need to draw on the analysis of traffic, health, social, soil and/or ecological systems impacts; etc.

- The assessment needs to consider impacts at all phases of the project cycle including: exploration (if relevant or significant), construction, routine operation, start-up operations, upset operations and decommissioning if relevant.

- The level of assessment should be commensurate with the risk to the environment.

Describe management and mitigation measures

- Describe any mitigation measures and management options proposed to prevent, control, abate or mitigate identified environmental impacts associated with the proposal and to reduce risks to human health and prevent the degradation of the environment. This should include an assessment of the effectiveness and reliability of the measures and any residual impacts after these measures are implemented.

- Proponents are expected to implement a 'reasonable level of performance' to minimise environmental impacts. The proponent must indicate how the proposal meets reasonable levels of performance. For example, reference technology based criteria if available, or identify good practice for this type of activity or development. A 'reasonable level of performance' involves adopting and implementing technology and management practices to achieve certain pollutant emissions levels in economically viable operations. Technology-based criteria evolve gradually over time as technologies and practices change.

- Use environmental impacts as key criteria in selecting between alternative sites, designs and technologies, and to avoid options having the highest environmental impacts.

- Outline any proposed approach (such as an Environmental Management Plan) that will demonstrate how commitments made in the EIS will be implemented. Areas that should be described include:

  a) operational procedures to manage environmental impacts

  b) monitoring procedures

  c) training programs

  d) community consultation

  e) complaint mechanisms including site contacts

  f) strategies to use monitoring information to improve performance

  g) strategies to achieve acceptable environmental impacts and to respond in event of exceedances.

4. Air

Describe baseline conditions

- Provide a description of existing air quality and meteorology, using existing information and site representative ambient monitoring data.

Assess impacts

- Identify all pollutants of concern and estimate emissions by quantity (and size for particles), source and discharge point.

- Estimate the resulting ground level concentrations of all pollutants. Where necessary (e.g. potentially significant impacts and complex terrain effects), use an appropriate dispersion model to estimate ambient pollutant concentrations. Discuss choice of model and parameters with the EPA.

- Describe the effects and significance of pollutant concentration on the environment, human health, amenity and regional ambient air quality standards or goals.

- Describe the contribution that the development will make to regional and global pollution, particularly in sensitive locations.

- For potentially odorous emissions provide the emission rates in terms of odour units (determined by techniques compatible with EPA procedures). Use sampling and analysis techniques for individual or complex odours and for point or diffuse sources, as appropriate.

  Note: With dust and odour, it may be possible to use data from existing similar activities to generate emission rates.

- Reference should be made to relevant guidelines, including *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* (EPA, 2022)*; Approved Methods for the Sampling and Analysis of Air Pollutants in NSW* (EPA, 2022)*; Assessment and Management of Odour from Stationary Sources in NSW* (DEC, 2006)*; Technical Notes: Assessment and Management of Odour from Stationary Sources in NSW (DEC, 2006); Load Calculation Protocol for use by holders of NSW Environment Protection Licences when calculating Assessable Pollutant Loads* (DECC, 2009).

Describe management and mitigation measures

- Outline specifications of pollution control equipment (including manufacturer's performance guarantees where available) and management protocols for both point and fugitive emissions. Where possible, this should include cleaner production processes.

5. Noise and vibration

Describe baseline conditions

- Determine the existing background (LA90) and ambient (LAeq) noise levels, as relevant, in accordance with the *NSW Noise Policy for Industry*.

- Determine the existing road traffic noise levels in accordance with the *NSW Road Noise Policy*, where road traffic noise impacts may occur.

- The noise impact assessment report should provide details of all monitoring of existing ambient noise levels including:

  a) details of equipment used for the measurements

  b) a brief description of where the equipment was positioned

  c) a statement justifying the choice of monitoring site(s), including the procedure used to choose the site(s), having regards to Fact Sheets A and B of the *NSW Noise Policy for Industry.*

  d) details of the exact location of the monitoring site and a description of land uses in surrounding areas

  e) a description of the dominant and background noise sources at the site

  f) day, evening and night assessment background levels for each day of the monitoring period

  g) the final Rating Background Level (RBL) value

  h) graphs of the measured noise levels for each day should be provided

  i) a record of periods of affected data (due to adverse weather and extraneous noise), methods used to exclude invalid data and a statement indicating the need for any re-monitoring.

Assess impacts

- Determine the project noise trigger levels for the site. For each identified potentially affected receiver, this should include:

  a) determination of the project intrusive noise level for each identified potentially affected receiver

  b) selection and justification of the appropriate amenity category for each identified potentially affected receiver

  c) determination of the project amenity noise level for each receiver

  d) determination of the appropriate maximum noise level event assessment (sleep disturbance) trigger level.

- Maximum noise levels during night-time period (10pm-7am) should be assessed to analyse possible affects on sleep. Determine expected noise level and noise character likely to be generated from noise sources during:

  a) site establishment

  b) construction

  c) operational phases

  d) transport including traffic noise generated by the proposal

  e) other services.

  Note: The noise impact assessment report should include noise source data for each source in 1/1 or 1/3 octave band frequencies including methods for references used to determine noise source levels. Noise source levels and characteristics can be sourced from direct measurement of similar activities or from literature (if full references are provided).

- Determine the noise levels likely to be received at the reasonably most affected location(s) (these may vary for different activities at each phase of the development).

- The noise impact assessment report should include:

a) a plan showing the assumed location of each noise source for each prediction scenario

b) a list of the number and type of noise sources used in each prediction scenario to simulate all potential significant operating conditions on the site

c) any assumptions made in the predictions in terms of source heights, directivity effects, shielding from topography, buildings or barriers, etc

d) methods used to predict noise impacts including identification of any noise models used.

e) the weather conditions considered for the noise predictions

f) the predicted noise impacts from each noise source as well as the combined noise level for each prediction scenario

g) for developments where a significant level of noise impact is likely to occur, noise contours for the key prediction scenarios should be derived

h) an assessment of the need to include modification factors as detailed in Fact Sheet C of the *NSW Noise Policy for Industry*.

- Discuss the findings from the predictive modelling and, where relevant noise criteria have not been met, recommend additional feasible and reasonable mitigation measures.

- The noise impact assessment report should include details of any mitigation proposed including the attenuation that will be achieved and the revised noise impact predictions following mitigation.

a) Where relevant noise/vibration levels cannot be met after application of all feasible and reasonable mitigation measures the residual level of noise impact needs to be quantified.

- For the assessment of existing and future traffic noise, details of data for the road should be included such as assumed traffic volume; percentage heavy vehicles by time of day; and details of the calculation process. These details should be consistent with any traffic study carried out in the EIS.

- Where blasting is intended an assessment in accordance with the *Technical Basis for Guidelines to Minimise Annoyance due to Blasting Overpressure and Ground Vibration* (ANZECC, 1990) should be undertaken. The following details of the blast design should be included in the noise assessment:

a) bench height, burden spacing, spacing burden ratio

b) blast hole diameter, inclination and spacing

c) type of explosive, maximum instantaneous charge, initiation, blast block size, blast frequency.

Describe management and mitigation measures

- Determine the most appropriate noise mitigation measures and expected noise reduction including both noise controls and management of impacts for both construction and operational noise. This will include selecting quiet equipment and construction methods, noise barriers or acoustic screens, location of stockpiles, temporary offices, compounds and vehicle routes, scheduling of activities, etc.

- For traffic noise impacts, provide a description of the ameliorative measures considered (if required), reasons for inclusion or exclusion, and procedures for calculation of noise levels including ameliorative measures. Also include, where necessary, a discussion of any potential problems associated with the proposed ameliorative measures, such as overshadowing effects from barriers. Appropriate ameliorative measures may include:

  a) use of alternative transportation modes, alternative routes, or other methods of avoiding the new road usage

  b) control of traffic (eg: limiting times of access or speed limitations)

  c) resurfacing of the road using a quiet surface

  d) use of (additional) noise barriers or bunds

  e) treatment of the façade to reduce internal noise levels buildings where the night-time criteria is a major concern

  f) more stringent limits for noise emission from vehicles (i.e. using specially designed ‘quite’ trucks and/or trucks to use air bag suspension

  g) driver education

  h) appropriate truck routes

i) limit usage of exhaust brakes

j) use of premium muffles on trucks

k) reducing speed limits for trucks

l) ongoing community liaison and monitoring of complaints

m) phasing in the increased road use.

4. Water

Describe baseline conditions

- Describe existing surface and groundwater quality – an assessment needs to be undertaken for any water resource likely to be affected by the proposal and for all conditions (e.g. a wet weather sampling program is needed if runoff events may cause impacts).

  Note: Methods of sampling and analysis need to conform with an accepted standard (e.g. Approved Methods for the Sampling and Analysis of Water Pollutants in NSW (DEC 2004) *or be approved and analyses undertaken by accredited laboratories).*

- Provide site drainage details and surface runoff yield.

- State the ambient Water Quality and River Flow Objectives for the receiving waters. These refer to the community's agreed environmental values and human uses endorsed by the Government as goals for the ambient waters. These environmental values are published on the website: http://www.environment.nsw.gov.au/ieo/index.htm. The EIS should state the environmental values listed for the catchment and waterway type relevant to your proposal. NB: A consolidated and approved list of environmental values are not available for groundwater resources. Where groundwater may be affected the EIS should identify appropriate groundwater environmental values and justify the choice.

- State the indicators and associated trigger values or criteria for the identified environmental values. This information should be sourced from the ANZECC 2000 *Guidelines for Fresh and Marine Water Quality* (http://www.environment.gov.au/water/publications/quality/nwqms-guidelines-4-vol1.html) (Note that, as at 2004, the NSW Water Quality Objectives booklets and website contain technical criteria derived from the 1992 version of the ANZECC Guidelines. The Water Quality Objectives remain as Government Policy, reflecting the community's environmental values and long-term goals, but the technical criteria are replaced by the more recent ANZECC 2000 Guidelines). NB: While specific guidelines for

groundwater are not available, the ANCECC 2000 Guidelines endorse the application of the trigger values and decision trees as a tool to assess risk to environmental values in groundwater.

- State any locally specific objectives, criteria or targets, which have been endorsed by the government e.g. the Healthy Rivers Commission Inquiries or the NSW Salinity Strategy (DLWC, 2000) (http://www.environment.nsw.gov.au/salinity/government/nswstrategy.htm).

- Where site specific studies are proposed to revise the trigger values supporting the ambient Water Quality and River Flow Objectives, and the results are to be used for regulatory purposes (e.g. to assess whether a licensed discharge impacts on water quality objectives), then prior agreement from the EPA on the approach and study design must be obtained.

- Describe the state of the receiving waters and relate this to the relevant Water Quality and River Flow Objectives (i.e. are Water Quality and River Flow Objectives being achieved?). Proponents are generally only expected to source available data and information. However, proponents of large or high risk developments may be required to collect some ambient water quality / river flow / groundwater data to enable a suitable level of impact assessment. Issues to include in the description of the receiving waters could include:

  a) lake or estuary flushing characteristics

  b) specific human uses (e.g. exact location of drinking water offtake)

  c) sensitive ecosystems or species conservation values

  d) a description of the condition of the local catchment e.g. erosion levels, soils, vegetation cover, etc

  e) an outline of baseline groundwater information, including, but not restricted to, depth to watertable, flow direction and gradient, groundwater quality, reliance on groundwater by surrounding users and by the environment

  f) historic river flow data where available for the catchment.

Assess impacts

- No proposal should breach clause 120 of the *Protection of the Environment Operations Act* 1997 (i.e. pollution of waters is prohibited unless undertaken in accordance with relevant regulations).

- Identify and estimate the quantity of all pollutants that may be introduced into the water cycle by source and discharge point including residual discharges after mitigation measures are implemented.

- Include a rationale, along with relevant calculations, supporting the prediction of the discharges.

- Describe the effects and significance of any pollutant loads on the receiving environment. This should include impacts of residual discharges through modelling, monitoring or both, depending on the scale of the proposal. Determine changes to hydrology (including drainage patterns, surface runoff yield, flow regimes, wetland hydrologic regimes and groundwater).

- Describe water quality impacts resulting from changes to hydrologic flow regimes (such as nutrient enrichment or turbidity resulting from changes in frequency and magnitude of stream flow).

- Identify any potential impacts on quality or quantity of groundwater describing their source.

- Identify potential impacts associated with geomorphological activities with potential to increase surface water and sediment runoff or to reduce surface runoff and sediment transport. Also consider possible impacts such as bed lowering, bank lowering, instream siltation, floodplain erosion and floodplain siltation.

- Identify impacts associated with the disturbance of acid sulphate soils and potential acid sulphate soils.

- Containment of spills and leaks shall be in accordance with EPA's guidelines section 'Bunding and Spill Management' at http://www.epa.nsw.gov.au/mao/bundingspill.htm and the most recent versions of the Australian Standards referred to in the Guidelines. Containment should be designed for no-discharge.

- The significance of the impacts listed above should be predicted. When doing this it is important to predict the ambient water quality and river flow outcomes associated with the proposal and to demonstrate whether these are acceptable in terms of achieving protection of the Water Quality and River Flow Objectives. In particular the following questions should be answered:

  a) will the proposal protect Water Quality and River Flow Objectives where they are currently achieved in the ambient waters; and

  b) will the proposal contribute towards the achievement of Water Quality and River Flow Objectives over time, where they are not currently achieved in the ambient waters.

- Consult with the EPA as soon as possible if a mixing zone is proposed (a mixing zone could exist where effluent is discharged into a receiving water body, where the quality of the water being discharged does not immediately meet water quality objectives. The mixing zone could result in dilution, assimilation and decay of the effluent to allow water quality objectives to be met further downstream, at the edge of the

mixing zone). The EPA will advise the proponent under what conditions a mixing zone will and will not be acceptable, as well as the information and modelling requirements for assessment.

Note: The assessment of water quality impacts needs to be undertaken in a total catchment management context to provide a wide perspective on development impacts, in particular cumulative impacts.

- Where a licensed discharge is proposed, provide the rationale as to why it cannot be avoided through application of a reasonable level of performance, using available technology, management practice and industry guidelines.

- Where a licensed discharge is proposed, provide the rationale as to why it represents the best environmental outcome and what measures can be taken to reduce its environmental impact.

- Reference should be made to relevant guidelines including *Managing Urban Stormwater: Soils and Construction* (Landcom, 2004), *Guidelines for Fresh and Marine Water Quality* ANZECC 2000), *Environmental Guidelines: Use of effluent by Irrigation* (DEC, 2004).

Describe management and mitigation measures

- Outline stormwater management to control pollutants at the source and contain them within the site. Also describe measures for maintaining and monitoring any stormwater controls.

- Outline erosion and sediment control measures directed at minimising disturbance of land, minimising water flow through the site and filtering, trapping or detaining sediment. Also include measures to maintain and monitor controls as well as rehabilitation strategies.

- Describe waste water treatment measures that are appropriate to the type and volume of waste water and are based on a hierarchy of avoiding generation of waste water; capturing all contaminated water (including stormwater) on the site; reusing/recycling waste water; and treating any unavoidable discharge from the site to meet specified water quality requirements.

- Outline pollution control measures relating to storage of materials, possibility of accidental spills (e.g. preparation of contingency plans), appropriate disposal methods, and generation of leachate.

- Describe hydrological impact mitigation measures including:

  a) site selection (avoiding sites prone to flooding and waterlogging, actively eroding or affected by deposition)

  b) minimising runoff

c) minimising reductions or modifications to flow regimes

d) avoiding modifications to groundwater.

- Describe groundwater impact mitigation measures including:

a) site selection

b) retention of native vegetation and revegetation

c) artificial recharge

d) providing surface storage with impervious linings

e) monitoring program.

- Describe geomorphological impact mitigation measures including:

a) site selection

b) erosion and sediment controls

c) minimising instream works

d) treating existing accelerated erosion and deposition

e) monitoring program.

- Any proposed monitoring should be undertaken in accordance with the *Approved Methods for the Sampling and Analysis of Water Pollutants in NSW* (DEC 2004).

5. Soils and contamination

Describe baseline conditions

- Provide any details (in addition to those provided in the location description - Section C) that are needed to describe the existing situation in terms of soil types and properties and soil contamination.

Assess impacts

- Identify any likely impacts resulting from the construction or operation of the proposal, including the likelihood of:

  a) disturbing any existing contaminated soil

  b) contamination of soil by operation of the activity

  c) subsidence or instability

  d) soil erosion

  e) disturbing acid sulphate or potential acid sulphate soils.

- Reference should be made to relevant guidelines including *Contaminated Sites – Guidelines for Consultants Reporting on Contaminated Sites* (OEH, 2011)*; Guidelines on the Duty to Report Contamination under the Contaminated Land Management Act 1997* (EPA, 2015).

Describe management and mitigation measures

- Describe and assess the effectiveness or adequacy of any soil management and mitigation measures during construction and operation of the proposal including:

  a) erosion and sediment control measures

  b) proposals for site remediation – see *Managing Land Contamination, Planning Guidelines SEPP 55 – Remediation of Land* (Department of Urban Affairs and Planning and Environment Protection Authority, 1998)

c) proposals for the management of these soils – see *Acid Sulphate Soil Manual* (Acid Sulphate Soil Advisory Committee 1998) and *Acid Sulphate Soils Assessment Guidelines* (Acid Sulphate Soil Advisory Committee 1998).

6. Waste and chemicals

Describe baseline conditions

- Describe any existing waste or chemicals operations related to the proposal.

Assess impacts

- Assess the adequacy of proposed measures to minimise natural resource consumption and minimise impacts from the handling, transporting, storage, processing and reprocessing of waste and/or chemicals.

- Reference should be made to: the EPA's *Waste Classification Guidelines 2014 (as in force from time to time)*

- If the proposal is an energy from waste facility it must:

  - demonstrate that the proposed operation will comply with the NSW EPA's Energy from Waste Policy Statement;

  - describe of the classes and quantities of waste that would be thermally treated at the facility;

  - demonstrate that waste used as a feedstock in the waste to energy plant would be the residual from a resource recovery process that maximises the recovery of material;

  - detail procedures that would be implemented to control the inputs to the waste to energy plant, including contingency measures that would be implemented if inappropriate materials are identified;

  - detail the location and size of stockpiles of unprocessed and processed recycled waste at the site;

  - demonstrate any waste material (e.g. biochar, ash) produced from the waste to energy facility for land application is fit-for-purpose and poses minimal risk of harm to the environment in order to meet the requirements for consideration of a resource recovery order and /or exemption by the EPA;

  - detail procedures for the management of other solid, liquid and gaseous waste streams;

- describe how waste would be treated, stored, used, disposed and handled on site, and transported to and from the site, and the potential impacts associated with these issues, including current and future offsite waste disposal methods; and

- identify the measures that would be implemented to ensure that the development is consistent with the aims, objectives and guidance in the *NSW Waste Avoidance and Resource Recovery Strategy 2014-21*.

Describe management and mitigation measures

- Outline measures to minimise the consumption of natural resources.

- Outline measures to avoid the generation of waste and promote the re-use and recycling and reprocessing of any waste.

- Outline measures to support any approved regional or industry waste plans.

7. Cumulative impacts

- Identify the extent that the receiving environment is already stressed by existing development and background levels of emissions to which this proposal will contribute.

- Assess the impact of the proposal against the long term air, noise and water quality objectives for the area or region.

- Identify infrastructure requirements flowing from the proposal (e.g. water and sewerage services, transport infrastructure upgrades).

- Assess likely impacts from such additional infrastructure and measures reasonably available to the proponent to contain such requirements or mitigate their impacts (e.g. travel demand management strategies).

F. List of approvals and licences

- Identify all approvals and licences required under environment protection legislation including details of all scheduled activities, types of ancillary activities and types of discharges (to air, land, water).

G. Compilation of mitigation measures

- Outline how the proposal and its environmental protection measures would be implemented and managed in an integrated manner so as to demonstrate that the proposal is capable of complying with statutory obligations under EPA licences or approvals (e.g. outline of an environmental management plan).

- The mitigation strategy should include the environmental management and cleaner production principles which would be followed when planning, designing, establishing and operating the proposal. It should include two sections, one setting out the program for managing the proposal and the other outlining the monitoring program with a feedback loop to the management program.

H. Justification for the Proposal

- Reasons should be included which justify undertaking the proposal in the manner proposed, having regard to the potential environmental impacts.

ATTACHMENT C: GUIDANCE MATERIAL

Title	Web address
Relevant Legislation	
Contaminated Land Management Act 1997	http://www.legislation.nsw.gov.au/#/view/act/1997/140
Environmentally Hazardous Chemicals Act 1985	http://www.legislation.nsw.gov.au/#/view/act/1985/14
Environmental Planning and Assessment Act 1979	http://www.legislation.nsw.gov.au/#/view/act/1979/203
Protection of the Environment Operations Act 1997	http://www.legislation.nsw.gov.au/#/view/act/1997/156
Water Management Act 2000	http://www.legislation.nsw.gov.au/#/view/act/2000/92
Licensing	
Guide to Licensing	www.epa.nsw.gov.au/licensing/licenceguide.htm
Air Issues	
Air Quality	
Approved methods for modelling and assessment of air pollutants in NSW (2022)	https://www.epa.nsw.gov.au/your-environment/air/industrial-emissions/approved-methods-for-the-modelling-and-assessment-of-air-pollutants
Approved methods for sampling and analysis of air pollutants in NSW (2022)	https://www.epa.nsw.gov.au/your-environment/air/industrial-emissions/sampling-analysing-air-emissions
POEO (Clean Air) Regulation 2010	http://www.legislation.nsw.gov.au/#/view/regulation/2010/428
Noise and Vibration	
NSW Noise Policy for Industry	http://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/noise-policy-for-industry-(2017)
Interim Construction Noise Guideline (DECC, 2009)	http://www.epa.nsw.gov.au/noise/constructnoise.htm
Assessing Vibration: a technical guideline (DEC, 2006)	http://www.epa.nsw.gov.au/noise/vibrationguide.htm
NSW Road Noise Policy (DECCW, 2011)	http://www.epa.nsw.gov.au/your-environment/noise/transport-noise
NSW Rail Infrastructure Noise Guideline (EPA, 2013)	http://www.epa.nsw.gov.au/your-environment/noise/transport-noise

Human Health Risk Assessment	
Environmental Health Risk Assessment: Guidelines for assessing human health risks from environmental hazards (enHealth, 2012)	http://www.eh.org.au/documents/item/916
Waste, Chemicals and Hazardous Materials and Radiation	
Waste	http://www.epa.nsw.gov.au/wastestrategy/warr.htm
Environmental Guidelines: Solid Waste Landfills (EPA, 2016)	http://www.epa.nsw.gov.au/waste/landfill-sites.htm
Draft Environmental Guidelines - Industrial Waste Landfilling (April 1998)	http://www.epa.nsw.gov.au/resources/waste/envguidlns/industrialfill.pdf
EPA's Waste Classification Guidelines 2014	http://www.epa.nsw.gov.au/wasteregulation/classify-guidelines.htm
Resource recovery orders and exemptions	http://www.epa.nsw.gov.au/wasteregulation/orders-exemptions.htm
European Unions Waste Incineration Directive 2000	http://ec.europa.eu/environment/archives/air/stationary/wid/legislation.htm
EPA's Energy from Waste Policy Statement	http://www.epa.nsw.gov.au/wastestrategy/energy-from-waste.htm
NSW Waste Avoidance and Resource Recovery Strategy 2014-2021	http://www.epa.nsw.gov.au/wastestrategy/warr.htm
Chemicals subject to Chemical Control Orders	
Chemical Control Orders (regulated through the EHC Act)	http://www.epa.nsw.gov.au/pesticides/CCOs.htm
National Protocol - Approval/Licensing of Trials of Technologies for the Treatment/Disposal of Schedule X Wastes - July 1994	Available in libraries
National Protocol for Approval/Licensing of Commercial Scale Facilities for the Treatment/Disposal of Schedule X Wastes - July 1994	Available in libraries
Water and Soils	
Acid sulphate soils	
Coastal acid sulphate soils guidance material	http://www.environment.nsw.gov.au/acidsulfatesoil/ and http://www.epa.nsw.gov.au/mao/acidsulfatesoils.htm
Acid Sulphate Soils Planning Maps	http://www.environment.nsw.gov.au/acidsulfatesoil/riskmaps.htm
Contaminated Sites Assessment and Remediation	
Managing land contamination: Planning Guidelines – SEPP 55 Remediation of Land	http://www.epa.nsw.gov.au/clm/planning.htm

Guidelines for Consultants Reporting on Contaminated Sites (EPA, 2000)	http://www.epa.nsw.gov.au/resources/clm/20110650consultantsglines.pdf
Guidelines for the NSW Site Auditor Scheme - 2nd edition (DEC, 2006)	http://www.epa.nsw.gov.au/resources/clm/auditorglines06121.pdf
Sampling Design Guidelines (EPA, 1995)	http://www.epa.nsw.gov.au/resources/clm/95059sampgdlne.pdf
National Environment Protection (Assessment of Site Contamination) Measure 1999 (or update)	http://www.scew.gov.au/nepms/assessment-site-contamination
Soils – general	
Managing land and soil	http://www.environment.nsw.gov.au/soils/landandsoil.htm
Managing urban stormwater for the protection of soils	http://www.environment.nsw.gov.au/stormwater/publications.htm
Landslide risk management guidelines	http://australiangeomechanics.org/admin/wp-content/uploads/2010/11/LRM2000-Concepts.pdf http://www.australiangeomechanics.org/resources/downloads/
Site Investigations for Urban Salinity (DLWC, 2002)	http://www.environment.nsw.gov.au/resources/salinity/booklet3siteinvestigationsforurbansalinity.pdf
Local Government Salinity Initiative Booklets	http://www.environment.nsw.gov.au/salinity/solutions/urban.htm
Water	
Water Quality Objectives	http://www.environment.nsw.gov.au/ieo/index.htm
ANZECC (2000) Guidelines for Fresh and Marine Water Quality	http://www.environment.gov.au/water/publications/quality/nwqms-guidelines-4-vol1.html
Applying Goals for Ambient Water Quality Guidance for Operations Officers - Mixing Zones	Contact the EPA on 131555
Approved Methods for the Sampling and Analysis of Water Pollutant in NSW (2004)	http://www.environment.nsw.gov.au/resources/legislation/approvedmethods-water.pdf

File Ref. No: FRN23/3259 BFS23/5597 8000031108
TRIM Doc. No: D23/96030
Contact: Senior Firefighter Gavin Scott

4 October 2023

SALLY MUNK
NSW Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Sally,

Re: Advice on Secretary's Environmental Assessment Requirements (SEARs) – WASTE MANAGEMENT FACILITY (BOTANY) – 2-4 HALE STREET, BOTANY (SSD-62855708)

Fire and Rescue NSW (FRNSW) acknowledge correspondence received on 29 September 2023, requesting input into the preparation of the SEARs for the WASTE MANAGEMENT FACILITY (BOTANY) – 2-4 HALE STREET, BOTANY (SSD-62855708). FRNSW have reviewed the SEARs along with the Scoping Report and make the following comments:

There is currently insufficient information available regarding the fire safety and emergency response management aspects of the project to allow FRNSW to provide specific commentary. Below are generalised publicly available resources that may assist in the planning and design stages of this project:

1. Access for fire brigade vehicles and firefighters[1] is a FRNSW guideline document that may be used to ensure the provision of safe, efficient, and effective access for fire brigade vehicles to any premises and allow firefighters to rapidly intervene when a fire or other emergency incident occurs.

2. Fire safety in waste facilities[2] is a FRNSW guideline document that may be used to provide guidance on fire safety in waste facilities, including adequate provision for fire safety and facilitate safe fire brigade intervention to protect life, property and the environment.

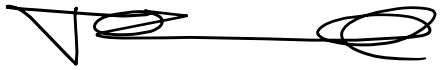
FRNSW requests to be consulted and given the opportunity to review and provide comment regarding the proposed fire and life safety systems at the preliminary and final design phases of the project. For further information please contact the Operational Liaison and Special Hazards Unit, referencing FRNSW file number BFS23/5597. Please ensure that all correspondence in relation to this matter is submitted electronically to firesafety@fire.nsw.gov.au.

Fire and Rescue NSW **ABN** 12 593 473 110

Community Safety Directorate
Operational Liaison and Special Hazards Unit
Locked Bag 12,
Greenacre NSW 2190
T 02 9742 7434
F 02 9742 7483

www.fire.nsw.gov.au

Yours sincerely,



Superintendent James O'Carroll
Manager
Operational Liaison and Special Hazards Unit

Cc: sally.munk@planning.nsw.gov.au

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[1] https://www.fire.nsw.gov.au/gallery/files/pdf/guidelines/guidelines_access_for_emergency_vehicles.pdf
[2] https://www.fire.nsw.gov.au/gallery/files/pdf/guidelines/guidelines_fire_safety_in_waste_facilities.pdf

Sally Munk

From: Nicole Davis
Sent: Friday, 6 October 2023 2:39 PM
To: Sally Munk
Subject: HPE CM: Heritage NSW - Aboriginal Cultural Heritage - Advice on SEARs - Waste Management Facility, Botany (SSD-62855708) (Bayside)

Record Number: DOC2023/0889915

Dear Sally,

Heritage NSW recommends that the following SEAR's be included with respect to Aboriginal cultural heritage (ACH) in relation to the proposed Waste Management Facility, Botany (SSD-62855708) (Bayside).

Provide an Aboriginal Cultural Heritage Assessment Report (ACHAR), prepared in accordance with relevant policy and guidelines, identifying, describing and assessing any impacts to Aboriginal cultural heritage sites or values associated with the project.

- The ACHAR must be prepared in accordance with the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH, 2011) and the *Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW* (DECCW, 2010), including results of thorough archaeological survey and test excavations (where required);
- Include evidence of adequate and continuous consultation with Aboriginal stakeholders in determining and assessing impacts, developing and selecting options for avoidance of Aboriginal cultural heritage and mitigation measures (including the final proposed measures), having regard to the *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW, 2010).

If you require any further information please contact me directly.

Kind Regards

Nicole Davis
Manager Assessments
Heritage NSW
Department of Planning and Environment
E nicole.davis@environment.nsw.gov.au
Locked Bag 5020 Parramatta 2124

NSW GOVERNMENT

From: no-reply@majorprojects.planning.nsw.gov.au <no-reply@majorprojects.planning.nsw.gov.au>
Sent: Friday, 29 September 2023 11:25 AM
To: Erin McWhirter <Erin.McWhirter@environment.nsw.gov.au>; Tanya Pelz <tanya.pelz@environment.nsw.gov.au>; OEH HD Heritage Mailbox <HERITAGEMailbox@environment.nsw.gov.au>
Cc: Sally Munk <Sally.Munk@planning.nsw.gov.au>
Subject: Major Projects – New Request for Advice - Waste Management Facility, Botany (SSD-62855708) (Bayside)

The Department has sent you a request for advice in relation to the Waste Management Facility, Botany.The due date for this request is 12/10/23.

Please sign in to your account to view the details of this request and to upload your advice.

If you have any enquiries, please contact Sally Munk on 9274 6431 /at sally.munk@planning.nsw.gov.au.

To sign in to your account click here or visit the Major Projects Website.
Please do not reply to this email.

Kind regards

The Department of Planning and Environment

Subscribe to our newsletter

11 October 2023

Sally Munk
Principal Planner
Department of Planning and Environment
sally.munk@planning.nsw.gov.au

RE: Sydney Water input to SEARs for SSD-62855708 at 2-4 Hale Street, Botany

Thank you for seeking Sydney Water's input on the Secretary's Environmental Assessment Requirements for SSD-62855708 at 2-4 Hale Street, Botany which proposes the construction of a waste management facility. The facility proposes to accept up to 300,000 tonnes per annum (tpa) of C&D waste and would operate as a waste transfer station for receipt, basic sorting and recycling with aggregation of material. We have reviewed the proposal and provide the following comments for your consideration.

The proposed development presents potential impacts to Sydney Water's assets including but not limited to:

Stormwater

- Our site inspection in March 2023 found that this subject site has number of unauthorised stormwater connections into Sydney Water's stormwater channel, which is located along the north/north-western boundary of the property. **The proponent needs to ensure the removal of all these unauthorised connections from the property and needs to engage appropriate professionals to ensure stormwater discharge from the development site complies with Sydney Water's connection requirements.**
- No buildings or permanent structures are to be proposed over the stormwater channel / pipe or within 1m from the outside wall of the channel / pipe or within Sydney Water's easement, whichever is larger. Permanent structures include (but are not limited to) basement car parks, hanging balconies, roof eves, hanging stairs, stormwater pits, stormwater pipes, elevated driveway, basement access or similar structures. This clearance requirement would apply for unlimited depth and height.
- The applicant is required to submit the elevation drawings with the stormwater channel/ pipe shown, to ensure that the proposed buildings and permanent structures are 1m away from the outside face of the stormwater channel and away from the Sydney Water easement.

Sydney Water requests that the Department of Planning, Industry and Environment include the following Secretary's Environmental Assessment Requirements relating to the provision of water-related services for the subject site:

Water-related Infrastructure Requirements

1. The proponent of the development should determine service demands following servicing investigations and demonstrate that satisfactory arrangements for drinking water, wastewater, and recycled water (if required) services have been made.
2. The proponent must obtain endorsement and/or approval from Sydney Water to ensure that the proposed development does not adversely impact on any existing

water, wastewater or stormwater main, or other Sydney Water asset, including any easement or property. When determining landscaping options, the proponent should take into account that certain tree species can cause cracking or blockage of Sydney Water pipes and therefore should be avoided.

3. Strict requirements for Sydney Water's stormwater assets (for certain types of development) may apply to this site. The proponent should ensure that satisfactory steps/measures have been taken to protect existing stormwater assets, such as avoiding building over and/or adjacent to stormwater assets and building bridges over stormwater assets. The proponent should consider taking measures to minimise or eliminate potential flooding, degradation of water quality, and avoid adverse impacts on any heritage items, and create pipeline easements where required.

Integrated Water Cycle Management

4. The proponent should outline any sustainability initiatives that will minimise/reduce the demand for drinking water, including any alternative water supply and end uses of drinking and non-drinking water that may be proposed, and demonstrate water sensitive urban design (principles are used), and any water conservation measures that are likely to be proposed. This will allow Sydney Water to determine the impact of the proposed development on our existing services and required system capacity to service the development.

Trade wastewater requirement

- If this proposed development is going to generate trade wastewater, the developer must submit an application requesting permission to discharge trade wastewater to Sydney Water's wastewater system. The applicant must wait for approval and issue of a permit before any business activities can commence.
- The permit application can be made on Sydney Water's web page through Sydney Water Tap In. http://www.sydneywater.com.au/tapin/index.htm

If you require any further information, please do not hesitate to contact the Growth Planning Team at urbangrowth@sydneywater.com.au.

Yours sincerely,

I. Malki

Ishtar Malki
Growth Intelligence Specialist
City Growth and Development, Business Development Group
Sydney Water, 1 Smith Street, Parramatta NSW 2150

Transport for NSW

14 October 2023

TfNSW Reference: SYD23/01098/01
DPE Reference: SSD-62855708

Ms Kiersten Fishburn
Secretary
Department of Planning & Environment
Locked Bag 5022
Parramatta NSW 2124

Attention: Sally Munk

REQUEST FOR SEARS (SSD-62855708)
WASTE MANAGEMENT FACILITY
2-4 HALE STREET, BOTANY

Dear Ms Fishburn,

Thank you for providing Transport for NSW (TfNSW) with an opportunity to comment on the Secretary's Environmental Assessment Requirements (SEARs) for a waste management facility at 2-4 Hale Street, Botany.

TfNSW has reviewed the submitted documents and advises that the agency has no further requirements beyond the scope identified in section 6.1.1 of the submitted Scoping Report dated Sep 2023. TfNSW is of the view that modelling on the classified road network is not required as the anticipated traffic generation of the proposed development is unlikely to be of sufficient scale to warrant this requirement.

For more information, please contact Xin Zhao via phone on 0466 599 538, by email at development.sydney@transport.nsw.gov.au.

Yours sincerely,

James Hall
Senior Land Use Planner
Land Use Assessment Eastern
Planning and Programs, Greater Sydney Division

Sally Munk

From: LANDS <lands@jemena.com.au>
Sent: Monday, 9 October 2023 11:45 AM
To: Sally Munk
Subject: RE: Proposed Waste Management Facility, Botany - SSD-62855708 - Request for Input to SEARs

Hi Sally,

Jemena has reviewed the location of the SSD at Botany and undertaken a review of the documentation provided.

Jemena has no objection to this development application.

[redacted]

cheers

Robert Campbell
Lands Management Officer
Jemena
Level 12, 99 Walker Street North Sydney,NSW, 2060
0404 885742
robert.campbell@jemena.com.au | www.jemena.com.au

From: Sally Munk <Sally.Munk@planning.nsw.gov.au>
Sent: Friday, 29 September 2023 11:27 AM
To: Airport Developments <Airport.Developments@AirservicesAustralia.com>; Airspace Protection <Airspace.Protection@casa.gov.au>; DPE PSVC Hazards Mailbox <hazards@planning.nsw.gov.au>; OEH HD Heritage Mailbox <HERITAGEMailbox@environment.nsw.gov.au>; LANDS <lands@jemena.com.au>; Laura Locke <Laura.Locke@planning.nsw.gov.au>; Airspace Protection <AirspaceProtection@syd.com.au>; urbangrowth@sydneywater.com.au; development@ausgrid.com.au
Subject: Proposed Waste Management Facility, Botany - SSD-62855708 - Request for Input to SEARs

The Department of Planning and Environment has received a request for Secretary's Environmental Assessment Requirements (SEARs) from Coombes Property Group for a Waste Management Facility, Botany. The proposed development is a State Significant Development under the *Environmental Planning and Assessment Act 1979.*

The Applicant proposes to construct and operate a waste transfer station with a capacity to process up to 300,000 tpa of construction and demolition waste, including new hardstand, purpose built warehouse, office and amenities, and two new crossovers.

The scoping report for the proposal may be viewed on the project page at:
https://www.planningportal.nsw.gov.au/major-projects/projects/waste-management-facility-botany

Your organisation is invited to provide input into the SEARs for the proposal including details of any key issues and assessment requirements by **Thursday 12 October 2023.**

If you have any enquiries, please contact me directly

Regards
Sally

Sally Munk
Principal Planner
Industry Assessments
Department of Planning and Environment

T (02) 9274 6431 **E** sally.munk@planning.nsw.gov.au

4 Parramatta Square, 12 Darcy Street, Parramatta | Locked Bag 5022, Parramatta NSW 2124

dpie.nsw.gov.au

I acknowledge the traditional custodians of the land and pay respects to Elders past and present. I also acknowledge all the Aboriginal and Torres Strait Islander staff working with NSW Government at this time.

Please consider the environment before printing this email.