Secretary's Environmental Assessment Requirements

Appendix A

Appendix A — Secretary's Environmental Assessment Requirements

A

Contact: Robert Byrne
Phone: (02) 9228 6398
Fax: (02) 9228 6466
Email: robert.byrne@planning.nsw.gov.au

Our ref: 15/14416-1

Mr Brett McLennan
Director
EMM
20 Chandos Street
St Leonards NSW 2065

Dear Mr McLennan

State Significant Development - Secretary's Environmental Assessment Requirements
Bourke Small Stock Abattoir (SSD 7268) Mitchell Highway, Bourke

I have attached a copy of the Secretary's Environmental Assessment Requirements (SEARs) for the preparation of an Environmental Impact Statement (EIS) for the development and operation of the Bourke Small Stock Abattoir.

These requirements have been prepared in consultation with the relevant government agencies and Bourke Shire Council (see **Attachment 2**), and are based on the information you have provided to date. Please note that the Department may alter these requirements at any time, and that you must consult further with the Department if you do not lodge a development application and EIS for the development within two years of the date of issue of these SEARs.

I wish to emphasise the importance of effective and genuine community consultation and the need for proposals to proactively respond to the community's concerns. Accordingly, a comprehensive, detailed and genuine community consultation and engagement process must be undertaken during preparation of the EIS. This process must ensure that the community is both informed of the proposal and is actively engaged in issues of concern to them. Sufficient information must be provided to the community so that it has a good understanding of what is being proposed and of the potential impacts.

Your proposal may require a license to export meat from the Commonwealth Department of Agriculture, and may be required to comply with the *Export Control Act 1982* (Comm) and associated Regulations and Export Control Orders. In this regard, the Department has sought the advice of the Commonwealth Department of Agriculture and this advice will be provided once received.

If the development is likely to have a significant impact on matters of National Environment Significance, it will require approval under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPPC Act). This approval would be in addition to any approval is required under NSW legislation and it is your responsibility to contact the Department of Environment to determine if an approval of the EPPC Act is required (https://www.environment.gov.au/epbc).

I would appreciate it if you would contact the Department at least two weeks before you propose to submit the development application and EIS for your development. This will enable the Department to:

- confirm the applicable fee (see Division 1AA, Part 15 of the *Environmental Planning and Assessment Regulation 2000*); and
- determine the number of copies (hard-copy and CD-ROM) of the EIS required.

If you have any enquiries about these requirements, please contact Robert Byrne on the details above.

Yours sincerely

C. Ritchie

Chris Ritchie 29/10/15.
Director
Industry Assessments
As the Secretary's nominee

Secretary's Environmental Assessment Requirements

Section 78A(8A) of the *Environmental Planning and Assessment Act 1979*

State Significant Development

Application Number	SSD 7268
Development	Development of a small stock abattoir north of Bourke township with the capacity to process up to 6,000 head per day, comprising primarily wild goats and some lambs. The proposal also includes ancillary infrastructure to support the abattoir operation, including vehicular access to/from the adjoining Mitchell Highway, heavy vehicle manoeuvring and turning areas, provision of essential infrastructure including electricity and reticulated water, car parking and a wastewater treatment system.
Location	Mitchell Highway, Bourke (Lot 17 in DP 753547 Bourke Shire Local Government Area)
Applicant	CAPRA Pty Ltd
Date of Issue	29 October 2015
General Requirements	The Environmental Impact Statement (EIS) for the development must meet the form and content requirements in Clauses 6 and 7 of Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*. In addition, the EIS must include: • detailed description of the development, including: – need for the proposed development; – justification for the proposed development; – likely staging of the development; – likely interactions between the development and existing, approved and proposed operations in the vicinity of the site; – plans of any proposed building works including details of the classification of all structures that may require an approval / certification under the Building Code of Australia; and • consideration of all relevant environmental planning instruments, including identification and justification of any inconsistencies with these instruments; • risk assessment of the potential environmental impacts of the development, identifying the key issues for further assessment; • detailed assessment of the key issues specified below, and any other significant issues identified in this risk assessment, which includes: – a description of the existing environment, using sufficient baseline data; – an assessment of the potential impacts of all stages of the development, including any cumulative impacts, taking into consideration relevant guidelines, policies, plans and statutes; and – a description of the measures that would be implemented to avoid, minimise and if necessary, offset the potential impacts of the development, including proposals for adaptive management and/or contingency plans to manage any significant risks to the environment; and • consolidated summary of all the proposed environmental management and monitoring measures, highlighting commitments included in the EIS.

	The EIS must also be accompanied by a report from a qualified quantity surveyor providing: • a detailed calculation of the capital investment value (as defined in clause 3 of the *Environmental Planning and Assessment Regulation 2000*) of the proposal, including details of all assumptions and components from which the CIV calculation is derived; • a close estimate of the jobs that will be created by the development during the construction and operational phases of the development; and • certification that the information provided is accurate at the date of preparation.
Key Issues	The EIS must address the following specific matters: • **Q Fever** - including: – the potential for increased risk in the transmission of Q fever as a result of the transportation, handling and processing of lamb, sheep and goats; and – an Environmental Health Risk Assessment (HRA) using the risk assessment model outlined in the *Guidelines for Assessing Human Health Risks from Environmental Hazards,* published by enHealth in 2012. The HRA should address the potential risks of Q fever associated with but not limited to: the design of the abattoir, dust suppression, waste disposal, workplace health and safety, water security, and community exposure through livestock transportation. • **Air Quality and Odour** - including: – an assessment of all potential air quality and odour sources from construction and operation of the abattoir and its wastewater treatment system, including details of air quality and odour impacts on private properties, in accordance with the relevant Environment Protection Authority (EPA) guidelines; – details of mitigation, management and monitoring measures for preventing and/or minimising both point and fugitive emissions; and – an assessment of the effectiveness of the proposed air quality and odour mitigation measures. • **Wastewater** – including: – a detailed description of the wastewater treatment requirements for the development including details of the volume of wastewater generated, treated, reused/recycled, or stored on site; – details of the key pollutant concentrations of the wastewater before and after treatment with reference to relevant water quality guidelines; – details of the proposed irrigation area, including baseline data on soil characteristics and a technical assessment of the suitability of the soil to sustain on-going wastewater irrigation; – an Irrigation Management Plan that details proposed irrigation practices and includes a detailed soil nutrient and water balance; and – a detailed assessment of wastewater management strategies in accordance with relevant guidelines;. • **Soils and Water** - including: – a description of the water demands of the development including details of adequate and secure water supply; – a detailed water balance, sources of water (surface and groundwater), disposal methods and storage structures; – a description of the measures to minimise water use; – a description of the water licensing and approval framework; – a description of the surface and stormwater management system, including on site detention, and measures to treat or reuse water; – an assessment of potential surface and groundwater impacts, including impacts on licensed water users, landholder rights and

	groundwater dependent ecosystems; – details of impact mitigation, management and monitoring measures; – an assessment of any potential existing soil contamination; and – a description of the erosion and sediment controls during construction and operation. • **Noise and Vibration** – including: – description of all potential noise and vibration sources including construction, operational, on and off-site traffic noise; – an assessment of the likely noise and vibration impact including a cumulative noise impact assessment in accordance with the *NSW Industrial Noise Policy* and other relevant EPA guidelines; and – details of noise and vibration mitigation, management and monitoring measures. • **Waste Management** – including: – details of the quantities and classification of all waste streams generated on site; – details on waste storage, handling and disposal; and – details of 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 2007* and the *draft NSW Waste Avoidance and Resource Recovery Strategy 2013-2021*. • **Traffic and Transport** – including: – a traffic impact study prepared in accordance with the methodology set out in Section 2 of the *Guide to Traffic Generating Developments* (RTA 2002); – details of the vehicular access locations and treatments, including safe intersection site distance; – all traffic and transport demands likely to be generated during construction and operation; – a description of haul routes, vehicle types and daily trip numbers; – details of any utility services which will need to be located within or across the Mitchell Highway; and – detailed plans of the proposed layout of the internal road network and parking on site in accordance with the relevant Australian standards. • **Biodiversity** – including: – accurate predictions of any vegetation clearing on-site or for any road upgrades; – a detailed assessment of the potential impacts on any threatened species, populations, endangered ecological communities or their habitats, groundwater dependent ecosystems, and any potential for offset requirements; – a detailed description of the measures to avoid, minimise, mitigate and offset biodiversity impacts; and the assessment of the proposal and all biodiversity values on the site under the Framework for Biodiversity Assessment 2014 and the NSW Office of Environment and Heritage Offset Policy. • **Social and Community** – including: – consideration of the increased demand on local community services and facilities; and – an assessment of local housing availability and affordability to accommodate the increased workforce. • **Land Use Safety** – including: - a preliminary risk screening completed in accordance with *Applying SEPP 33 – Hazardous and Offensive Development Application Guidelines* (DoP 2011). Should the screening indicate that the development is "potentially hazardous", a Preliminary Hazard Analysis (PHA) must be prepared in accordance with *Hazardous Industry Planning Advisory Paper No. 6 - Guidelines for Hazard Analysis* (DoP, 2011). The PHA should estimate the cumulative risks

	from the existing and proposed development. • **Food Safety** – in relation to meat handling and processing and how NSW Food Authority standards and requirements will be met. • **Animal welfare, biosecurity and disease management** – including: – details of how the proposed development would comply with the relevant codes of practice and guidelines; – details for disease control measures; and – a detailed description of the contingency measures that would be implemented for the mass disposal of livestock in the event of disease outbreak. • **Visual** – including: – a description of the visual catchment and visual impacts including lighting impacts, as seen from the Mitchell Highway and any other publicly accessible vantage points or residences; and – an appraisal of visual impact mitigation measures. • **Greenhouse Gas** – including: – an assessment of the potential greenhouse gas emissions of the development, including an assessment of the potential impacts of these emissions on the environment; and – a detailed description of the measures that would be implemented on site to ensure that the development is energy efficient. • **Heritage** – including: – Aboriginal and non-Aboriginal heritage items and values of the site and surrounding area, taking into account the *NSW Heritage Manual* and *Assessment Heritage Significant Guidelines*.
Plans and Documents	The EIS must include all relevant plans, architectural drawings, diagrams and relevant documentation required under Schedule 1 of the *Environmental Planning and Assessment Regulation 2000*. These documents should be included as part of the EIS rather than as separate documents.
Consultation	During the preparation of the EIS, you must consult with the relevant local, State or Commonwealth Government authorities, service providers, community groups and affected landowners. In particular you must consult with: • Environment Protection Authority; • Bourke Shire Council; • NSW Health - Western NSW Local Health District; • Department of Primary Industries, including DPI Water; • NSW Roads and Maritime Services; • Office of Environment and Heritage; • Rural Fire Service; • local community and other stakeholders. The EIS must describe the consultation process and the issues raised, and identify where the design of the development has been amended in response to these issues. Where amendments have not been made to address an issue, a short explanation should be provided.
Further consultation after 2 years	If you do not lodge a development application and an EIS for the development within 2 years of the issue date of these SEARs, you must consult further with the Secretary in relation to the requirements for the preparation of the EIS.
References	The assessment of the key issues listed above must take into account relevant guidelines, policies, and plans as identified. While not exhaustive, **Attachment 1** contains a list of some of the guidelines, policies, and plans that may be relevant to the environmental assessment of this development.

ATTACHMENT 1
Technical and Policy Guidelines

The following guidelines may assist in the preparation of the Environmental Impact Statement. This list is not exhaustive and not all of these guidelines may be relevant to your proposal.

Many of these documents can be found on the following websites:
http://www.planning.nsw.gov.au,
http://www.bookshop.nsw.gov.au,
http://www.publications.gov.au

Policies, Guidelines & Plans

Aspect	Policy /Methodology
Q-Fever	
	Guidelines for Assessing Human Health Risks from Environmental Hazards 2012 (enHealth)
Air Quality	
	Protection of the Environment Operations (Clean Air) Regulation 2002
	Approved Methods for the Modelling and Assessment of Air Pollutants in NSW (DEC)
	Approved Methods for the Sampling and Analysis of Air Pollutants in NSW (DEC)
	Generic Guidance and Optimum Model Settings for the CALPUFF Modelling System for Inclusion into the Approved Methods for the Modelling and Assessment of Air Pollutants in NSW (TRC 2011)
	Action for Air (DECC)
Odour	
	Technical Framework: Assessment and Management of Odour from Stationary Sources in NSW (DEC)
	Technical Notes: Assessment and Management of Odour from Stationary Sources in NSW (DEC)
Wastewater	
	Environmental Guidelines: Use of Effluent by Irrigation (DEC)
	National Water Quality Management Strategy - Guidelines For Water Recycling: Managing Health And Environmental Risks (Phase1) 2006 (EPHC, NRMMC & AHMC)
	National Water Quality Management Strategy – Australian Guidelines for Water Recycling: Managing Health and Environmental Risks (Phase 2): Augmentation of Drinking Water Supplies 2008 (EPHC, NRMMC & AHMC)
	National Water Quality Management Strategy: Guidelines for Sewerage Systems - Effluent Management (ARMCANZ/ANZECC)
	National Water Quality Management Strategy: Guidelines for Sewerage Systems - Use of Reclaimed Water (ARMCANZ/ANZECC)
Soil and Water	
Soil	*Australian and New Zealand Guidelines for the Assessment and Management of Contaminated Sites* (ANZECC & NHMRC)
	National Environment Protection (Assessment of Site Contamination) Measure 1999 (NEPC)
	Draft Guidelines for the Assessment & Management if Groundwater Contamination (DECC)
	State Environmental Planning Policy No. 55 – Remediation of Land
	Managing Land Contamination – Planning Guidelines SEPP 55 –

	Remediation of Land (DOP)
Surface Water	*Water Sharing Plan for the Hunter Unregulated and Alluvial Water Sources 2009*
	National Water Quality Management Strategy: Water quality management - an outline of the policies (ANZECC/ARMCANZ)
	National Water Quality Management Strategy: Policies and principles - a reference document (ANZECC/ARMCANZ)
	National Water Quality Management Strategy: Implementation guidelines (ANZECC/ARMCANZ)
	National Water Quality Management Strategy: Australian Guidelines for Fresh and Marine Water Quality (ANZECC/ARMCANZ)
	National Water Quality Management Strategy: Australian Guidelines for Water Quality Monitoring and Reporting (ANZECC/ARMCANZ)
	Using the ANZECC Guideline and Water Quality Objectives in NSW (DEC)
	State Water Management Outcomes Plan
	NSW Government Water Quality and River Flow Environmental Objectives (DECC)
	Approved Methods for the Sampling and Analysis of Water Pollutants in NSW (DEC)
	Managing Urban Stormwater: Soils & Construction (Landcom)
	Managing Urban Stormwater: Treatment Techniques (DECC)
	Managing Urban Stormwater: Source Control (DECC)
	Technical Guidelines: Bunding & Spill Management (DECC)
	NSW Guidelines for Controlled Activities 2012
	NSW Water Conservation Strategy 2000
	MDBC Guidelines on Groundwater Flow Modelling 2000
	Australian Groundwater Modelling Guidelines 2012
Groundwater	*NSW Aquifer Interference Policy* 2012
	National Water Quality Management Strategy Guidelines for Groundwater Protection in Australia (ARMCANZ/ANZECC)
	NSW State Groundwater Policy Framework Document 1997 (DLWC)
	NSW State Groundwater Quality Protection Policy 1998 (DLWC)
	NSW State Groundwater Quantity Management Policy 2002 (DLWC)
	Guidelines for the Assessment and Management of Groundwater Contamination (DECC)
Noise and Vibration	
	NSW Industrial Noise Policy (EPA, 2000) and Industrial Noise Policy Application Notes
	NSW Road Noise Policy (EPA, 2011)
	Environmental Noise Control Manual (DECC)
	Interim Construction Noise Guideline (DECC, 2009)
	Assessing Vibration: a Technical Guide (DEC, 2006)
	Assessing Vibration: A Technical Guideline (DECC 2006)
Waste	
	Waste Avoidance and Resource Recovery Strategy 2007 (DECC)
	Waste Classification Guidelines (DECC)
	Environmental Guidelines: Assessment Classification and Management of Non-Liquid and Liquid Waste (NSW EPA)
	Environmental guidelines: Composting and Related Organics Processing Facilities (DEC)
	Environmental guidelines: Use and Disposal of Biosolid Products (NSW EPA)
	Composts, soil conditioners and mulches (Standards Australia, AS 4454)

Transport	
	Guide to Traffic Generating Developments (RTA)
	Road and Related Facilities (Department of Planning EIS Guidelines)
	Road Design Guide (RTA)
Social and Community	
	Guidebook on Social Impact Assessment (Department of Planning 2005)
Hazards	
	State Environmental Planning Policy No. 33 – Hazardous and Offensive Development
	Applying SEPP 33 – Hazardous and Offensive Development Application Guidelines (DUAP)
	Hazardous Industry Planning Advisory Paper No. 6 – Guidelines for Hazard Analysis
Visual	
	Control of Obtrusive Effects of Outdoor Lighting (Standards Australia, AS 4282)
	State Environmental Planning Policy No 64 - Advertising and Signage
Greenhouse Gas	
	AGO Factors and Methods Workbook (AGO)
	Guidelines for Energy Savings Action Plans (DEUS, 2005)
Biodiversity	
	Framework for Biodiversity Assessment -NSW Biodiversity Offsets Policy for Major Projects 2014 (NSW OEH);
	State Environmental Planning Policy No 44 – Koala Habitat Protection (SEPP 44)
	The NSW State Groundwater Dependent Ecosystem Policy (DLWC)
Heritage	
Aboriginal	*Guideline to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* 2011 (DECCW)
	NSW Heritage Manual (NSW Heritage Office & DUAP)
Non- Aboriginal	*The Burra Charter (The Australia ICOMOS charter for places of cultural significance)*

ATTACHMENT 2

Government Authority's Environmental Assessment Requirements

- **Bourke Shire Council**
- **Roads and Maritime Services**
- **Office of Environment and Heritage**
- **Environment Protection Authority**
- **Department of Primary Industries**
- **NSW Health (Western NSW Local Health District)**

The Council of The Shire of Bourke

29 Mitchell St, Bourke, N.S.W 2840
P.O. Box 21, Bourke, N.S.W 2840
Telephone (02) 6830 8000 Fax (02) 6872 3030
Email: bourkeshire@bourke.nsw.gov.au
Web: http://www.bourke.nsw.gov.au

Please address all communications to the General Manager

Our Ref: ReL-KSH-T4.1-C8.9.1-S8.1

26th October 2015

Mr. Robert Byrne
Senior Planner
Department of Planning and Environment
G.P.O. Box 39
SYDNEY 2001
robert.byrne@planning.nsw.gov.au

Dear Robert,

Re: SEARS Request in relation to the Development of a Livestock Processing Facility near Bourke

Thank you for allowing Council to consider the matter at its Council meeting today.

Council would like to the proponents to clarify the amount of waste to be generated and the options being considered for the disposal of the waste.

Council has also reviewed the issues raised by DPI Water in relation to the supply and disposal of water at the proposed abattoir and feel that once addressed, the concerns raised by DPI Water will adequately cover any Council queries in this regard.

Should you have any queries please contact the Manager of Environmental Services Dwayne Willoughby.

Yours Faithfully

Ross Earl
GENERAL MANAGER

Transport
Roads & Maritime
Services

SF2015/165086; WST15/00121

The Manager
Industry Assessments
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Mr Robert Byrne

Dear Mr Byrne

SSD7268: Lot 17 DP 753546; 'Artisan Block' Mitchell Highway (HW7), Bourke;
Small Stock Abattoir;
Request for input into Secretary's Environmental Assessment Requirements (SEARs)

Thank you for your email on 8 October 2015 requesting input into SEARs for a proposed small stock abattoir at 'Artisan Block' Bourke from Roads and Maritime Services. I note the proposal has been referred to Roads and Maritime in accordance with Schedule 2 of the *Environmental Planning & Assessment Regulation 2000.*

The documentation has been reviewed and the site inspected. The proposed development includes the following:

- Construction and operation of an abattoir on existing rural land approximately 16 kilometres north of Bourke.
- Construction and use of a vehicular access from the Mitchell Highway to the site.
- Processing of up to 6,000 goats and sheep per day. The abattoir will operate 24 hours per day, 7 days per week.

All vehicular access to the abattoir will be via the proposed vehicular access to the Mitchell Highway. The speed zone of the Mitchell Highway at this location is 110km/h.

Roads and Maritime has identified the following key issues which need to be included and addressed in the Environmental Impact Statement being prepared in support of the project:

- A traffic impact study prepared in accordance with the methodology set out in Section 2 of the *RTA's Guide to Traffic Generating Developments 2002* and including:
    - Road transport volumes and types broken down into origin and destination and travel routes. The study will need to address the impacts of related traffic generation on public roads and on other road users. The traffic study needs to also address internal traffic movements and parking facilities.

- Opening and operating hours for the facility and peak hour traffic generation for construction and operation of the project.
- Temporary and permanent staff numbers (including employees and contractors) during construction and operation of the project.
- The impact of generated traffic and measures employed to ensure efficiency and safety on the public road network during construction and operation of the project.
- Any mitigating measures required to address expected traffic generation.

- Vehicular access location and treatments need to be identified and in accordance with *Austroads Guide to Road Design* and Roads and Maritime Supplements, including safe intersection sight distance.
- Details of any utility services for the proposed development which will need to be located within or cross the Mitchell Highway.
- Any gate or grid located in the access to the abattoir from the Mitchell Highway setback a minimum length of 40 metres from the edge of the northbound travel lane in the Mitchell Highway.

Roads and Maritime appreciates the opportunity to provide comment and requests that a copy of the SEARs be forwarded to Roads and Maritime at the same time they are sent to the applicant.

Should you require further information please contact Andrew McIntyre on 02 6861 1453.

Yours faithfully

Susie Mackay
Network & Safety Manager
Western

22 OCT 2015

cc Mr Brett McClennan
EMM
Level 1 Suite 1
6 Bolton Street
NEWCASTLE NSW 2300

NSW GOVERNMENT | Office of Environment & Heritage

22 October 2015
DOC15/397550
SSD 7268

Mr Robert Byrne
Senior Planner
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr Byrne

SEARs for Proposed Bourke Small Stock Abattoir (SSD 7268)

I refer to your e-mail dated 8 October 2015 seeking input into the Department of Planning and Environment Secretary's Environmental Assessment Requirements (SEARs) for the preparation of an Environmental Impact Assessment (EIS) for the Proposed Bourke Small Stock Abattoir (SSD 7268).

OEH has considered your request and provides SEARs for the proposed development in Attachments A, B and C and guidance material in Attachment D.

OEH recommends the EIS needs to appropriately address the following:

1. Biodiversity and offsetting
2. Aboriginal cultural heritage
3. Water and soils
4. Flooding

OEH notes that there are a number of Endangered Ecological Communities and threatened species that occur in this area which, if present on or near the development site, could potentially be affected by the proposal, and that there is potential that Aboriginal cultural heritage items to also be present.

Please note that the NSW Biodiversity Offsets Policy for Major Projects http://www.environment.nsw.gov.au/resources/biodiversity/140672biopolicy.pdf is now being implemented. The policy provides a standard method for assessing impacts of major projects on biodiversity and determining offsetting arrangements. The policy is underpinned by the Framework for Biodiversity Assessment (FBA) http://www.environment.nsw.gov.au/resources/biodiversity/140675fba.pdf which contains the assessment methodology that is adopted by the policy to quantify and describe the impact assessment requirements and offset guidance that applies to Major Projects. The FBA must be used by a proponent to assess all biodiversity values on the development site.

If you have any questions regarding this matter further please contact Michelle Howarth on 02 6883 5339.

PO Box 2111 Dubbo NSW 2830
Level 1, 48-52 Wingewarra Street Dubbo NSW 2830
Tel: (02) 6883 5330 Fax: (02) 6884 8675
ABN 30 841 387 271
www.environment.nsw.gov.au

Yours sincerely

SONYA ARDILL
Senior Team Leader Planning North West Region
Regional Operations Group

Attachment A - Standard Environmental Assessment Requirements
Attachment B - Project Specific Environmental Assessment Requirements
Attachment C - Species/Populations/Ecological Communities which require further consideration
Attachment D - Guidance material

Contact officer: MICHELLE HOWARTH
02 6883 5339

Attachment A – Standard Environmental Assessment Requirements

Biodiversity
1. Biodiversity impacts related to the proposed Bourke Small Stock Abattoir are to be assessed and documented in accordance with the Framework for Biodiversity Assessment, unless otherwise agreed by OEH, by a person accredited in accordance with s142B(1)(c) of the *Threatened Species Conservation Act 1995.*
Aboriginal cultural heritage
2. The EIS must identify and describe the tangible and intangible Aboriginal cultural heritage values that exist across the whole area that will be affected by the Small Stock Abattoir development and document these in the EIS. This may include the need for surface survey and test excavation. The identification of cultural heritage values should be guided by the *Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW* (DECCW, 2011) and consultation with OEH regional officers.
3. Where Aboriginal cultural heritage values are identified, consultation with Aboriginal people must be undertaken and documented in accordance with the *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW). The significance of cultural heritage values for Aboriginal people who have a cultural association with the land must be documented in the EIS.
4. Impacts on Aboriginal cultural heritage values are to be assessed and documented in the EIS. The EIS must demonstrate attempts to avoid impact upon cultural heritage values and identify any conservation outcomes. Where impacts are unavoidable, the EIS must outline measures proposed to mitigate impacts. Any objects recorded as part of the assessment will be documented and notified to OEH.
Water and soils
5. The EIS must map the following features relevant to water and soils including: a. Acid sulfate soils (Class 1, 2, 3 or 4 on the Acid Sulfate Soil Planning Map). b. Rivers, streams, wetlands, estuaries (as described in Appendix 2 of the Framework for Biodiversity Assessment). c. Groundwater. d. Groundwater dependent ecosystems. e. Proposed intake and discharge locations.
6. The EIS must describe background conditions for any water resource likely to be affected by the development, including: a. Existing surface and groundwater. b. Hydrology, including volume, frequency and quality of discharges at proposed intake and discharge locations. c. Water Quality Objectives (as endorsed by the NSW Government http://www.environment.nsw.gov.au/ieo/index.htm) including groundwater as appropriate that represent the community's uses and values for the receiving waters. d. Indicators and trigger values/criteria for the environmental values identified at (c) in accordance with the ANZECC (2000) Gudielines for Fresh and Marine Water Quality and/or local objectives, criteria or targets endorsed by the NSW Government.
7. The EIS must assess the impacts of the development on water quality, including:

a. The nature and degree of impact on receiving waters for both surface and groundwater, demonstrating how the development protects the Water Quality Objectives where they are currently being achieved, and contributes towards achievement of the Water Quality Objectives over time where they are currently not being achieved. This should include an assessment of the mitigating effects of proposed stormwater and wastewater management during and after construction.

b. Identification of proposed monitoring of water quality.

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

Flooding

9. The EIS must map the following features relevant to flooding as described in the Floodplain Development Manual 2005 (NSW Government 2005) including:
   a. Flood prone land
   b. Flood planning area, the area below the flood planning level.
   c. Hydraulic categorisation (floodways and flood storage areas).

10. The EIS must describe flood assessment and modelling undertaken in determining the design flood levels for events, including a minimum of the 1 in 10 year, 1 in 100 year flood levels and the probable maximum flood, or an equivalent extreme event.

11. The EIS must model the effect of the proposed development (including fill) on the flood behaviour under the following scenarios:
   a. Current flood behaviour for a range of design events as identified in 8) above. The 1 in 200 and 1 in 500 year flood events as proxies for assessing sensitivity to an increase in rainfall intensity of flood producing rainfall events due to climate change.

12. Modelling in the EIS must consider and document:
   a. The impact on existing flood behaviour for a full range of flood events including up to the probable maximum flood.
   b. Impacts of the development on flood behaviour resulting in detrimental changes in potential flood affection of other developments or land. This may include redirection of flow, flow velocities, flood levels, hazards and hydraulic categories.

c. Relevant provisions of the NSW Floodplain Development Manual 2005.

13. The EIS must assess the impacts on the proposed development on flood behaviour, including:

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

Attachment B – Project Specific Environmental Assessment Requirements

Biodiversity
A. Impacts on the species/populations/ecological communities listed in Attachment C will require further consideration and provision of the information specified in s9.2 of the Framework for Biodiversity Assessment

Attachment C – Species/Populations/Ecological Communities which require further consideration

Class	Scientific Name	Common Name	NSW Status	Comm. Status
EEC	*Artesian Springs Ecological Community in the Great Artesian Basin*	Artesian Springs Ecological Community in the Great Artesian Basin	CE	E
Flora	*Atriplex infrequens*	A saltbush	V	V
Flora	*Osteocarpum scleropterum*	Squash Bush	E	
Flora	*Pimelea elongata*	Rice Flower	E	
Flora	*Sida rohlenae*	Shrub Sida	E	

Attachment D – Guidance material

Title	Web address
Relevant Legislation	
Coastal Protection Act 1979	http://www.legislation.nsw.gov.au/maintop/view/inforce/act+13+1979+cd+0+N
Commonwealth Environment Protection and Biodiversity Conservation Act 1999	http://www.austlii.edu.au/au/legis/cth/consol_act/epabca1999588/
Environmental Planning and Assessment Act 1979	http://www.legislation.nsw.gov.au/maintop/view/inforce/act+203+1979+cd+0+N
Fisheries Management Act 1994	http://www.legislation.nsw.gov.au/maintop/view/inforce/act+38+1994+cd+0+N
Marine Parks Act 1997	http://www.legislation.nsw.gov.au/maintop/view/inforce/act+64+1997+cd+0+N
National Parks and Wildlife Act 1974	http://www.legislation.nsw.gov.au/maintop/view/inforce/act+80+1974+cd+0+N
Protection of the Environment Operations Act 1997	http://www.legislation.nsw.gov.au/maintop/view/inforce/act+156+1997+cd+0+N
Threatened Species Conservation Act 1995	http://www.legislation.nsw.gov.au/maintop/view/inforce/act+101+1995+cd+0+N
Water Management Act 2000	http://www.legislation.nsw.gov.au/maintop/view/inforce/act+92+2000+cd+0+N
Wilderness Act 1987	http://www.legislation.nsw.gov.au/viewtop/inforce/act+196+1987+FIRST+0+N
Biodiversity	
NSW Biodiversity Offsets Policy for Major Projects (OEH, 2013)	http://www.environment.nsw.gov.au/biodivoffsets/1480biofpolmp.htm
Framework for Biodiversity Assessment (OEH, 2013)	http://www.environment.nsw.gov.au/biodivoffsets/1480biofpolmp.htm
Fisheries NSW policies and guidelines	http://www.dpi.nsw.gov.au/fisheries/habitat/publications/policies,-guidelines-and-manuals/fish-habitat-conservation
List of national parks	http://www.environment.nsw.gov.au/NationalParks/parksearchatoz.aspx
Revocation, recategorisation and road adjustment policy (OEH, 2012)	http://www.environment.nsw.gov.au/policies/RevocationOfLandPolicy.htm
Guidelines for developments adjoining land and water managed by the Department of Environment, Climate Change and Water (DECCW, 2010)	http://www.environment.nsw.gov.au/resources/parks/policyRevocations.pdf
Aboriginal Cultural Heritage	
Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW, 2010)	http://www.environment.nsw.gov.au/resources/cultureheritage/commconsultation/09781ACHconsultreq.pdf

Title	Web address
Code of Practice for the Archaeological Investigation of Aboriginal Objects in New South Wales (DECCW, 2010)	http://www.environment.nsw.gov.au/resources/cultureheritage/10783FinalArchCoP.pdf
Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW (OEH 2011)	http://www.environment.nsw.gov.au/resources/cultureheritage/20110263ACHguide.pdf
Aboriginal Site Recording Form	http://www.environment.nsw.gov.au/resources/parks/SiteCardMainV1_1.pdf
Aboriginal Site Impact Recording Form	http://www.environment.nsw.gov.au/resources/cultureheritage/120558asirf.pdf
Aboriginal Heritage Information Management System (AHIMS) Registrar	http://www.environment.nsw.gov.au/contact/AHIMSRegistrar.htm
Care Agreement Application form	http://www.environment.nsw.gov.au/resources/cultureheritage/20110914TransferObject.pdf
Water and Soils	
Acid sulphate soils	
Acid Sulfate Soils Planning Maps	http://canri.nsw.gov.au/download/
Acid Sulfate Soils Manual (Stone et al. 1998)	Manual available for purchase from: http://www.landcom.com.au/whats-new/the-blue-book.aspx Chapters 1 and 2 are on DPI's Guidelines Register at: Chapter 1 Acid Sulfate Soils Planning Guidelines: http://www.planning.nsw.gov.au/rdaguidelines/documents/NSW%20Acid%20Sulfate%20Soils%20Planning%20Guidelines.pdf Chapter 2 Acid Sulfate Soils Assessment Guidelines: http://www.planning.nsw.gov.au/rdaguidelines/documents/NSW%20Acid%20Sulfate%20Soils%20Assessment%20Guidelines.pdf
Acid Sulfate Soils Laboratory Methods Guidelines (Ahern et al. 2004)	http://www.derm.qld.gov.au/land/ass/pdfs/lmg.pdf This replaces Chapter 4 of the Acid Sulfate Soils Manual above.
Flooding and Coastal Erosion	
Reforms to coastal erosion management	http://www.environment.nsw.gov.au/coasts/coastalerosionmgmt.htm
Floodplain development manual	http://www.dnr.nsw.gov.au/floodplains/manual.shtml
Guidelines for Preparing Coastal Zone Management Plans	Guidelines for Preparing Coastal Zone Management Plans http://www.environment.nsw.gov.au/resources/coasts/101019GdlnsCZMPs.pdf
NSW Climate Impact Profile	NSW Climate Impact Profile
Climate Change Impacts and Risk Management	Climate Change Impacts and Risk Management: A Guide for Business and Government, AGIC Guidelines for Climate Change Adaptation
Water	
Water Quality Objectives	http://www.environment.nsw.gov.au/ieo/index.htm
ANZECC (2000) Guidelines for Fresh and Marine Water Quality	http://www.mincos.gov.au/publications/australian_and_new_zealand_guidelines_for_fresh_and_marine_water_quality
Applying Goals for Ambient Water Quality Guidance for Operations Officers – Mixing Zones	http://deccnet/water/resources/AWQGuidance7.pdf

Title	Web address
Approved Methods for the Sampling and Analysis of Water Pollutant in NSW (2004)	http://www.environment.nsw.gov.au/resources/legislation/approvedmethods-water.pdf

NSW EPA

CAPRA Developments Pty Ltd
Unit 3/9 Gateway Cresent, Orange NSW 2800

Attention: Mr Jim Saran and Mr James Price
Cc: Department of Planning and Environment

Notice Number	1534265
File Number	SF15/37627
Date	29-Sep-2015

RE: "Intergrated Development Proposal - Proposed Bourke Abattoir "

I refer to your request for the Environment Protection Authority's (EPA) requirements for the Environmental Assessment (EA) in regard to the above proposal received by EPA on 3 September 2015.

The EPA has considered the details of the proposal as provided by the applicant and has determined that the proposal is Integrated Development (IDA) for the purposes of the EPA as the applicant will require an Environment Protection Licence (EPL) for the project. Should the applicant obtain development consent, the applicant will need to make a separate application to the EPA for the licence.

The EPA has considered the details in the proposal and identified the information it requires to issue its general terms of approval in Attachment A. In summary, the EPA's key information requirements for the proposal include an adequate assessment of:

1. **Water -** Surface water management including the potential impact of water pollution on local watercourses (including water demand and management requirements). Information must be provided to demonstrate how all dirty and contaminated water generated will be effectively contained onsite to prevent offsite discharge. This must include the identification of management systems for the protection of surface water and groundwater from runoff from all contaminated surfaces. The assessment must include flood mitigation and management measures and erosion and sediment control requirements.

2. **Groundwater -** The impact on groundwater, including impact on groundwater dependent ecosystems and other water users. This must include details of lining requirements for all contaminated structures and a demonstration of how the EPA's minimum liner requirement of a permeability of 1 x 10-9 m/s over a minimum depth of 900mm will be met.

3. **Waste Management-** Management of all waste streams, including the management of effluent, manure and carcass disposal at the premises. The Environmental assessment must identify how all waste will be managed onsite and disposed of, including contingency plans to deal with incidents such as mass mortality. This must also include identification of possible effluent and manure reuse sites and an assessment of suitability of these sites for reuse in accordance with *NSW EPA Environmental Guidelines Use of Effluent by Irrigation.*

4. **Noise -** The impact on noise amenity for any proposed works and operations to ensure compliance with the noise limits as outlined in the NSW Industrial Noise Policy (INP), including an assessment against

the EPA's INP. This must identify potential noise impacts from proposed operations and identification of noise management and mitigation procedures/measures to ensure compliance with the INP.

5. **Air -** The impact on air quality including the management of odour generated at the premises, including assessment of impacts based on the EPA's *Assessment and Management of Odour from Stationery source NSW* (2006). This must include identification of any necessary odour management and mitigation procedures/measures.

6. **Disposal of Mortallty's -** management of mortality's under normal operating conditions and in the event of a mass death scenario to prevent odour emissions, contain pathogens, control vermin and disease vectors and proposed liners to protect surface and groundwater pollution (please refer to liner requirements referred to in item 2).

The Department notes all aspects of the project must be assessed in addressing the key information requirements.

The EIS must include detailed description of all infrastructure associated with the abattoir including information to demonstrate how relevant design standards and criteria will be met (for example capacity of relevant structures to cope with the relevant storm event). Existing and proposed site plans must be provided. This must include proposed effluent and manure reuse sites and suitability assessment for all proposed application areas as well as relevant water and nutrient balances and monitoring regimes (if applicable).

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

Please note that this response does not cover biodiversity or Aboriginal cultural heritage issues, which are the responsibility of the Office of Environment and Heritage.

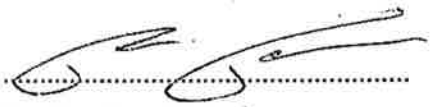
The Proponent should be made aware that any commitments made in the EA may be formalised as approval conditions and may also be placed as formal licence conditions.

The Proponent 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 and/or assurances. The amount and form of the assurance(s) would be determined by the EPA and required as a condition of an Environment Protection Licence ("EPL").

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

To assist the EPA in assessing the EIS it is requested that the EIS follow the format of the Department of Planning and Environment EIS Guidelines (where in existence) and/or the specific EIS requirements as outlined in the attachments.

Yours sincerely



Bradley Tanswell

Acting Unit Head Far West Operations

Environment Protection Authority

(by Delegation)

ATTACHMENT A: EIS REQUIREMENTS FOR

Proposed Bourke Abattoir

How to use these requirements

The EPA requirements have been structured in accordance with the DIPNR 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.

Air

- Identify all sources of air emissions from the development.
  Note: emissions can be classed as either:
  - *point (eg 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 (eg 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 for significant air impacts.

Noise and vibration

- Identify all noise 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:
  a) including 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 eg 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 *Environmental Guidelines: Assessment, Classification and Management of Liquid and Non-liquid Wastes* (NSW EPA, 1999).
- 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: *Environmental Guidelines: Assessment, Classification and Management of Liquid and Non-Liquid Wastes* (NSW EPA, 1999).

ESD

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

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

  f) 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 (eg 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 sulfate soils and potential acid sulfate 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 (eg 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 eg 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 exceedences.

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 (eg 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 DECCW.
- 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 / DECCW 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 <list relevant guidelines e.g. *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* (DEC, 2001); *Approved Methods for the Sampling and Analysis of Air Pollutants in NSW* (DEC, 2007); *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 in accordance with the *NSW Industrial Noise Policy*.
- Determine the existing road traffic noise levels in accordance with the *NSW Environmental Criteria for Road Traffic Noise*, 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, including the procedure used to choose the site, having regards to the definition of 'noise sensitive locations(s)' and 'most affected locations(s)' described in Section 3.1.2 of the *NSW Industrial Noise Policy*
  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 under Step 1 in Section B1.3 of the *NSW Industrial Noise Policy*
  j) determination of LAeq noise levels from existing industry.

Assess impacts

- Determine the project specific noise levels for the site. For each identified potentially affected receiver, this should include:
  a) determination of the intrusive criterion 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 amenity criterion for each receiver
  d) determination of the appropriate sleep disturbance limit.
- Maximum noise levels during night-time period (10pm-7am) should be assessed to analyse possible affects on sleep. Where LA1(1min) noise levels from the site are less than 15 dB above the

background LA90 noise level, sleep disturbance impacts are unlikely. Where this is not the case, further analysis is required. Additional guidance is provided in Appendix B of the *NSW Environmental Criteria for Road Traffic Noise*.

- Determine expected noise level and noise character (eg tonality, impulsiveness, vibration, etc) 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 most sensitive locations (these may vary for different activities at each phase of the development). Potential impacts should be determined for any identified significant adverse meteorological conditions. Predicted noise levels under calm conditions may also aid in quantifying the extent of impact where this is not the most adverse condition.
- 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. Where modelling approaches other than the use of the ENM or SoundPlan computer models are adopted, the approach should be appropriately justified and validated
  e) an assessment of appropriate weather conditions for the noise predictions including reference to any weather data used to justify the assumed conditions
  f) the predicted noise impacts from each noise source as well as the combined noise level for each prediction scenario under any identified significant adverse weather conditions as well as calm conditions where appropriate
  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 Section 4 of the *NSW Industrial Noise Policy*.
- Discuss the findings from the predictive modelling and, where relevant noise criteria have not been met, recommend additional 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.
- Where relevant noise/vibration criteria cannot be met after application of all feasible and cost effective mitigation measures the residual level of noise impact needs to be quantified by identifying:
  a) locations where the noise level exceeds the criteria and extent of exceedence

b) numbers of people (or areas) affected

c) times when criteria will be exceeded

d) likely impact on activities (speech, sleep, relaxation, listening, etc)

e) change on ambient conditions

f) the result of any community consultation or negotiated agreement.

- 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 breaks

  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 sulfate soils and potential acid sulfate soils.
- Containment of spills and leaks shall be in accordance with the technical guidelines section 'Bunding and Spill Management' of the *Authorised Officers Manual* (EPA, 1995) (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 *Managing Urban Stormwater: Soils and Construction* (DECC, 2008), *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 (eg 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 storages 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 sulfate or potential acid sulfate soils.
- Reference should be made to *Contaminated Sites – Guidelines for Consultants Reporting on Contaminated Sites* (EPA, 1997); *Contaminated Sites – Guidelines on Significant Risk of Harm from Contaminated Land and the Duty to Report* (EPA, 2003).

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 *Assessing and Managing Acid Sulfate Soils,* Environment Protection Authority, 1995 (note that this is the only methodology accepted by the EPA).

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 *Environmental Guidelines: Assessment, Classification and Management of Liquid and Non-Liquid Wastes* (EPA, 1999).

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 (eg 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 (eg 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 (eg 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 B: GUIDANCE MATERIAL

Title	Web address
Relevant Legislation	
Contaminated Land Management Act 1997	http://www.legislation.nsw.gov.au/maintop/view/inforce/act+140+1997+cd+0+N
Environmentally Hazardous Chemicals Act 1985	http://www.legislation.nsw.gov.au/maintop/view/inforce/act+14+1985+cd+0+N
Environmental Planning and Assessment Act 1979	http://www.legislation.nsw.gov.au/maintop/view/inforce/act+203+1979+cd+0+N
Protection of the Environment Operations Act 1997	http://www.legislation.nsw.gov.au/maintop/view/inforce/act+156+1997+cd+0+N
Water Management Act 2000	http://www.legislation.nsw.gov.au/maintop/view/inforce/act+92+2000+cd+0+N
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 (2005)	http://www.epa.nsw.gov.au/resources/air/ammodelling05361.pdf
POEO (Clean Air) Regulation 2010	http://www.legislation.nsw.gov.au/maintop/view/inforce/subordleg+428+2010+cd+0+N
Noise and Vibration	
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
Industrial Noise Policy Application Notes	http://www.epa.nsw.gov.au/noise/applicnotesindustnoise.htm
Environmental Criteria for Road Traffic Noise (EPA, 1999)	http://www.epa.nsw.gov.au/resources/noise/roadnoise.pdf
Interim Guideline for the Assessment of Noise from Rail Infrastructure Projects (DECC, 2007)	http://www.epa.nsw.gov.au/noise/railinfranoise.htm
Environmental assessment requirements for rail traffic-generating developments	http://www.epa.nsw.gov.au/noise/railnoise.htm

Waste, Chemicals and Hazardous Materials and Radiation	
Waste	
Environmental Guidelines: Solid Waste Landfills (EPA, 1996)	http://www.epa.nsw.gov.au/resources/waste/envguidlns/solidlandfill.pdf
Draft Environmental Guidelines - Industrial Waste Landfilling (April 1998)	http://www.epa.nsw.gov.au/resources/waste/envguidlns/industrialfill.pdf
Waste Classification Guidelines (DECC, 2009)	http://www.epa.nsw.gov.au/waste/envguidlns/index.htm
Resource recovery exemption	http://www.epa.nsw.gov.au/waste/RRecoveryExemptions.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 sulfate soils guidance material	http://www.environment.nsw.gov.au/acidsulfatesoil/
Acid Sulfate 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.planning.nsw.gov.au/assessingdev/pdf/gu_contam.pdf
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)	Available by request from EPA's Environment Line

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://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

NSW GOVERNMENT | Department of Primary Industries

OUT15/29717

Mr Robert A Byrne
Industry Assessments
NSW Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Robert.Byrne@planning.nsw.gov.au

Dear Mr Byrne,

Bourke Small Stock Abattoir (SSD_7268)
Request for input into Secretary's Environmental Assessment Requirements

I refer to your email dated 2015 to the Department of Primary Industries in respect to the above matter.

Comment by DPI Lands
DPI Lands have provided detailed SEARs in Attachment A.

For further information please contact Shaun Barker, Group Leader- Natural Resources and Property Management, (Dubbo Office) on 6883 5411 or at shaun.barker@crownland.nsw.gov.au.

Comment by DPI Water
DPI Water has reviewed the supporting documentation accompanying the request for Secretary's Environmental Assessment Requirements (SEARs) and provides the following comments, and further detail in Attachment B.

It is recommended that the EIS be required to include:

- Annual volumes of surface water and groundwater proposed to be taken by the activity (including through inflow and seepage) from each surface and groundwater source as defined by the relevant water sharing plan.
- Assessment of any volumetric water licensing requirements (including those for ongoing water take following completion of the project).
- The identification of an adequate and secure water supply for the life of the project. Confirmation that water can be sourced from an appropriately authorised and reliable supply. This is to include an assessment of the current market depth where water entitlement is required to be purchased. Where water is to be supplied from Council it is recommended an

assessment be provided to consider the ability to meet the demands of both the project and Council under a range of climatic scenarios.

- A detailed and consolidated site water balance.
- Assessment of impacts on surface and ground water sources (both quality and quantity), related infrastructure, adjacent licensed water users, basic landholder rights, watercourses, riparian land, and groundwater dependent ecosystems, and measures proposed to reduce and mitigate these impacts.
- Full technical details and data of all surface and groundwater modelling.
- Proposed surface and groundwater monitoring activities and methodologies.
- Assessment of any potential cumulative impacts on water resources, and any proposed options to manage the cumulative impacts.
- Consideration of relevant policies and guidelines.
- A statement of where each element of the SEARs is addressed in the EIS (i.e. in the form of a table).

For further information please contact Nicole Hely, Water Regulation Officer (Parramatta Office) on 8838 7816 or at nicole.hely@dpi.nsw.gov.au

Comment by DPI Agriculture

DPI Agriculture request an assessment of the potential for landuse conflict including the impact on the large residential lot located adjacent to the proposed development (including the impact should the dwelling entitlement be taken up).

For further information contact Mary Kovac, Resource Management Officer (Dubbo Office) on 6881 1250 or at mary.kovac@industry.nsw.gov.au.

Yours sincerely

Mitchell Isaacs
Director, Planning Policy & Assessment Advice
28/10/2015

Attachment A

Bourke Small Stock Abattoir (SSD_7268)
Request for Input into Secretary's Environment Assessment Requirements
Detailed comments – DPI Lands

Environmental Impact Statement (EIS) Requirements

In order to fully assess the environmental impacts, the department requires that the following points be fully discussed in the EIS for the proposed feedlot in regards to occupation and use of Lot 17 in DP 753546, Lot 2 in DP 753547, Lot 19 in DP 753546, and Lot 6297 in DP 768182:

- Topographic character of the site, including slopes, aspects, and elevations;
- GPS coordinates for all corners of the proposed feedlot area, sediment pond and effluent pond, including the projection/coordinate system the coordinates are captured as. Locations of any stockpiles of solids and composted materials will also be required;
- Size of total development footprint, including access, storage, infrastructure etc.;
- Access route(s);
- Proposed use of Lot 19 in DP 753546 (part WLL 1309) and Lot 6297 in DP 768182 (WLL 2469) - eg. will all or some paddocks be used for (a) low intensity/broadscale grazing, (b) high intensity grazing / feedlotting, (c) buffer areas, (d) stockpiles/storage etc.
- Weed and feral animal control;
- Soil issues, including soil types, erosion, amount and effect of disturbance, and reversibility of any soil degradation;
- Wind and water erosion potential, including control methods;
- Waste water management for irrigation - eg. will this be paddock scale or for lawns/garden etc;
- Amount, source and quality of water required by feedlot, including for dust suppression activities. *(Note: Need to ensure that water quality will not lead to dryland salinisation of access tracks and other areas over time, especially if the water is sourced from groundwater bores)*; and
- Environmental monitoring regime.

Other Issues

Crown Lands Licence

Until CAPRA is the registered holder on title for the above Crown lands (including WLLs), should CAPRA wish to access and/or undertake studies on any of these lands, CAPRA will need to apply for and obtain a Crown Lands Licence for site investigations, which will require a letter of consent from Mr and Mrs Old (as registered lessee). Please advise CAPRA of this requirement and provide CAPRA with the following contact details should it want to apply for a Crown Lands Licence:

- Shaun Barker (Group Leader- Property Services, Far West Area)- 02 6883 5411 (phone) or shaun.barker@crownland.nsw.gov.au (email).

Western Lands Leases

Given that CAPRA has advised that it will be purchasing WLL 1309 and WLL 2469, please advise CAPRA of its forthcoming responsibilities under the *Western Lands Act 1901*, *Western Lands Regulation 2011*, and lease conditions in regards to:

- maintenance of boundary fencing to a stock-proof condition;
- management of land condition and groundcover, including no overgrazing of any land;
- feral animal control; and
- improvement and maintenance of infrastructure.

Conditional Lease 3049

Under Crown lands legislation, the holder of CL 3049 has a statutory right to convert CL 3049 from leasehold title to freehold title. Please advise CAPRA of this conversion right and provide CAPRA with the following contact details should it want to pursue the conversion of CL 3049 once it becomes the registered lessee of both Lot 2 and Lot 17:

- Amanda Beetson (Group Leader- Property Services, Far West Area)- 02 6883 5402 (phone) or amanda.beetson@crownland.nsw.gov.au (email).

End Attachment A

Attachment B

Bourke Small Stock Abattoir (SSD_7268)
Request for Input into Secretary's Environment Assessment Requirements
DPI Water General Assessment Requirements for general projects

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The following detailed assessment requirements are provided to assist in adequately addressing the assessment requirements for this proposal.

For further information visit the DPI Water website, www.water.nsw.gov.au

Key Relevant Legislative Instruments

This section provides a basic summary to aid proponents in the development of an Environmental Impact Statement (EIS), and should not be considered a complete list or comprehensive summary of relevant legislative instruments that may apply to the regulation of water resources for a project.

The EIS should take into account the objects and regulatory requirements of the *Water Act 1912* (WA 1912) and *Water Management Act 2000* (*WMA 2000*), and associated regulations and instruments, as applicable.

Water Management Act 2000 (WMA 2000)
Key points:

- Volumetric licensing in areas covered by water sharing plans.
- Works within 40m of waterfront land.
- SSD & SSI projects are exempt from requiring water supply work approvals and controlled activity approvals as a result of the *Environmental Planning & Assessment Act 1979 (EP&A Act)*.
- No exemptions for volumetric licensing apply as a result of the *EP&A Act*.
- Basic landholder rights, including harvestable rights dams.
- Aquifer interference activity approval and flood management work approval provisions have not yet commenced and are regulated by the *Water Act 1912*.
- Maximum penalties of $2.2 million plus $264,000 for each day an offence continues apply under the *WMA 2000.*

Water Act 1912 (WA 1912)
Key points:

- Volumetric licensing in areas where no water sharing plan applies.
- Monitoring bores.
- Aquifer interference activities that are not regulated as a water supply work under the *WMA 2000*.
- Flood management works.
- No exemptions apply to licences or permits under the *WA 1912* as a result of the *EP&A Act*.
- Regulation of water bore driller licensing.

Water Management (General) Regulation 2011
Key points:

- Provides various exemptions for volumetric licensing and activity approvals.
- Provides further detail on requirements for dealings and applications.

Water Sharing Plans – these are considered regulations under the *WMA 2000*

Access Licence Dealing Principles Order 2004

Harvestable Rights Orders

Water Sharing Plans

It is important that the proponent understands and describes the ground and surface water sharing plans, water sources, and management zones that apply to the project. The relevant water sharing plans can be determined spatially at www.ourwater.nsw.gov.au. Multiple water sharing plans may apply and these must all be described.

The *Water Act 1912* applies to all water sources not yet covered by a commenced water sharing plan.

The EIS is required to:

- Demonstrate how the proposal is consistent with the relevant rules of the Water Sharing Plan including rules for access licences, distance restrictions for water supply works and rules for the management of local impacts in respect of surface water and groundwater sources, ecosystem protection (including groundwater dependent ecosystems), water quality and surface-groundwater connectivity.
- Provide a description of any site water use (amount of water to be taken from each water source) and management including all sediment dams, clear water diversion structures with detail on the location, design specifications and storage capacities for all the existing and proposed water management structures.
- Provide an analysis of the proposed water supply arrangements against the rules for access licences and other applicable requirements of any relevant WSP, including:
    - Sufficient market depth to acquire the necessary entitlements for each water source.
    - Ability to carry out a "dealing" to transfer the water to relevant location under the rules of the WSP.
    - Daily and long-term access rules.
    - Account management and carryover provisions.
- Provide a detailed and consolidated site water balance.
- Further detail on licensing requirements is provided below.

Relevant Policies and Guidelines

The EIS should take into account the following policies (as applicable):

- NSW Guidelines for Controlled Activities on Waterfront Land (NOW, 2012)
- NSW Aquifer Interference Policy (NOW, 2012)
- Risk Assessment Guidelines for Groundwater Dependent Ecosystems (NOW, 2012)
- Australian Groundwater Modelling Guidelines (NWC, 2012)
- NSW State Rivers and Estuary Policy (1993)
- NSW Wetlands Policy (2010)
- NSW State Groundwater Policy Framework Document (1997)
- NSW State Groundwater Quality Protection Policy (1998)
- NSW State Groundwater Dependent Ecosystems Policy (2002)
- NSW Water Extraction Monitoring Policy (2007)

DPI Water policies can be accessed at the following links:
http://www.water.nsw.gov.au/Water-management/Law-and-policy/Key-policies/default.aspx
http://www.water.nsw.gov.au/Water-licensing/Approvals/Controlled-activities/default.aspx

An assessment framework for the NSW Aquifer Interference Policy can be found online at: http://www.water.nsw.gov.au/Water-management/Law-and-policy/Key-policies/Aquifer-interference.

Licensing Considerations

The EIS is required to provide:

- Identification of water requirements for the life of the project in terms of both volume and timing (including predictions of potential ongoing groundwater take following the cessation of operations at the site – such as evaporative loss from open voids or inflows).
- Details of the water supply source(s) for the proposal including any proposed surface water and groundwater extraction from each water source as defined in the relevant Water Sharing Plan/s and all water supply works to take water.
- Explanation of how the required water entitlements will be obtained (i.e. through a new or existing licence/s, trading on the water market, controlled allocations etc.).
- Information on the purpose, location, construction and expected annual extraction volumes including details on all existing and proposed water supply works which take surface water, (pumps, dams, diversions, etc.).
- Details on all bores and excavations for the purpose of investigation, extraction, dewatering, testing and monitoring. All predicted groundwater take must be accounted for through adequate licensing.
- Details on existing dams/storages (including the date of construction, location, purpose, size and capacity) and any proposal to change the purpose of existing dams/storages
- Details on the location, purpose, size and capacity of any new proposed dams/storages.
- Applicability of any exemptions under the *Water Management (General) Regulation 2011* to the project.

Water allocation account management rules, total daily extraction limits and rules governing environmental protection and access licence dealings also need to be considered.

The Harvestable Right gives landholders the right to capture and use for any purpose 10% of the average annual runoff from their property. The Harvestable Right has been defined in terms of an equivalent dam capacity called the Maximum Harvestable Right Dam Capacity (MHRDC). The MHRDC is determined by the area of the property (in hectares) and a site-specific run-off factor. The MHRDC includes the capacity of all existing dams on the property that do not have a current water licence. Storages capturing up to the harvestable right capacity are not required to be licensed but any capacity of the total of all storages/dams on the property greater than the MHRDC may require a licence.

For more information on Harvestable Right dams, including a calculator, visit: http://www.water.nsw.gov.au/Water-licensing/Basic-water-rights/Harvesting-runoff/Harvesting-runoff

Dam Safety

Where new or modified dams are proposed, or where new development will occur below an existing dam, the NSW Dams Safety Committee should be consulted in relation to any safety issues that may arise. Conditions of approval may be recommended to ensure safety in relation to any new or existing dams.

See www.damsafety.nsw.gov.au for further information.

Surface Water Assessment

The predictive assessment of the impact of the proposed project on surface water sources should include the following:

- Identification of all surface water features including watercourses, wetlands and floodplains transected by or adjacent to the proposed project.
- Identification of all surface water sources as described by the relevant water sharing plan.
- Detailed description of dependent ecosystems and existing surface water users within the area, including basic landholder rights to water and adjacent/downstream licensed water users.
- Description of all works and surface infrastructure that will intercept, store, convey, or otherwise interact with surface water resources.
- Assessment of predicted impacts on the following:
    - flow of surface water, sediment movement, channel stability, and hydraulic regime,
    - water quality,
    - flood regime,
    - dependent ecosystems,
    - existing surface water users, and
    - planned environmental water and water sharing arrangements prescribed in the relevant water sharing plans.

Groundwater Assessment

To ensure the sustainable and integrated management of groundwater sources, the EIS needs to include adequate details to assess the impact of the project on all groundwater sources.

Where it is considered unlikely that groundwater will be intercepted or impacted (for example by infiltration), a brief site assessment and justification for the minimal impacts may be sufficient, accompanied by suitable contingency measures in place in the event that groundwater is intercepted, and appropriate measures to ensure that groundwater is not contaminated.

Where groundwater is expected to be intercepted or impacted, the following requirements should be used to assist the groundwater assessment for the proposal.

- The known or predicted highest groundwater table at the site.
- Works likely to intercept, connect with or infiltrate the groundwater sources.
- Any proposed groundwater extraction, including purpose, location and construction details of all proposed bores and expected annual extraction volumes.
- Bore construction information is to be supplied to DPI Water by submitting a "Form A" template. DPI Water will supply "GW" registration numbers (and licence/approval numbers if required) which must be used as consistent and unique bore identifiers for all future reporting.
- A description of the watertable and groundwater pressure configuration, flow directions and rates and physical and chemical characteristics of the groundwater source (including connectivity with other groundwater and surface water sources).
- Sufficient baseline monitoring for groundwater quantity and quality for all aquifers and GDEs to establish a baseline incorporating typical temporal and spatial variations.
- The predicted impacts of any final landform on the groundwater regime.
- The existing groundwater users within the area (including the environment), any potential impacts on these users and safeguard measures to mitigate impacts.

- An assessment of groundwater quality, its beneficial use classification and prediction of any impacts on groundwater quality.
- An assessment of the potential for groundwater contamination (considering both the impacts of the proposal on groundwater contamination and the impacts of contamination on the proposal).
- Measures proposed to protect groundwater quality, both in the short and long term.
- Measures for preventing groundwater pollution so that remediation is not required.
- Protective measures for any groundwater dependent ecosystems (GDEs).
- Proposed methods of the disposal of waste water and approval from the relevant authority.
- The results of any models or predictive tools used.

Where potential impact/s are identified the assessment will need to identify limits to the level of impact and contingency measures that would remediate, reduce or manage potential impacts to the existing groundwater resource and any dependent groundwater environment or water users, including information on:

- Any proposed monitoring programs, including water levels and quality data.
- Reporting procedures for any monitoring program including mechanism for transfer of information.
- An assessment of any groundwater source/aquifer that may be sterilised from future use as a water supply as a consequence of the proposal.
- Identification of any nominal thresholds as to the level of impact beyond which remedial measures or contingency plans would be initiated (this may entail water level triggers or a beneficial use category).
- Description of the remedial measures or contingency plans proposed.
- Any funding assurances covering the anticipated post development maintenance cost, for example on-going groundwater monitoring for the nominated period.

Groundwater Dependent Ecosystems

The EIS must consider the potential impacts on any Groundwater Dependent Ecosystems (GDEs) at the site and in the vicinity of the site and:

- Identify any potential impacts on GDEs as a result of the proposal including:
  - the effect of the proposal on the recharge to groundwater systems;
  - the potential to adversely affect the water quality of the underlying groundwater system and adjoining groundwater systems in hydraulic connections; and
  - the effect on the function of GDEs (habitat, groundwater levels, connectivity).
- Provide safeguard measures for any GDEs.

Watercourses, Wetlands and Riparian Land

The EIS should address the potential impacts of the project on all watercourses likely to be affected by the project, existing riparian vegetation and the rehabilitation of riparian land. It is recommended the EIS provides details on all watercourses potentially affected by the proposal, including:

- Scaled plans showing the location of:
  - wetlands/swamps, watercourses and top of bank;
  - riparian corridor widths to be established along the creeks;
  - existing riparian vegetation surrounding the watercourses (identify any areas to be protected and any riparian vegetation proposed to be removed);

- the site boundary, the footprint of the proposal in relation to the watercourses and riparian areas; and
- proposed location of any asset protection zones.

- Photographs of the watercourses/wetlands and a map showing the point from which the photos were taken.
- A detailed description of all potential impacts on the watercourses/riparian land.
- A detailed description of all potential impacts on the wetlands, including potential impacts to the wetlands hydrologic regime; groundwater recharge; habitat and any species that depend on the wetlands.
- A description of the design features and measures to be incorporated to mitigate potential impacts.
- Geomorphic and hydrological assessment of water courses including details of stream order (Strahler System), river style and energy regimes both in channel and on adjacent floodplains.

Landform rehabilitation

Where significant modification to landform is proposed, the EIS must include:

- Justification of the proposed final landform with regard to its impact on local and regional surface and groundwater systems;
- A detailed description of how the site would be progressively rehabilitated and integrated into the surrounding landscape;
- Outline of proposed construction and restoration of topography and surface drainage features if affected by the project; and
- An outline of the measures to be put in place to ensure that sufficient resources are available to implement the proposed rehabilitation.

Consultation and general enquiries

General licensing enquiries can be made to Advisory Services: water.enquiries@dpi.nsw.gov.au, 1800 353 104.

Assessment or state significant development enquiries, or requests for review or consultation should be directed to the Strategic Stakeholder Liaison Unit, water.referrals@dpi.nsw.gov.au.

A consultation guideline and further information is available online at:
www.water.nsw.gov.au/water-management/law-and-policy/planning-and-assessment

End Attachment B

Our ref: D15/11864

Health
Western NSW
Local Health District

Robert Byrne
Senior Planner Industry Assessments
NSW Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Via email: robert.byrne@planning.nsw.gov.au

Dear Mr Byrne

Proposed Bourke Small Stock Abattoir SSD 7268

I refer to your request for input into the Secretary's Environmental Assessment Requirements (SEARs) for the above proposal.

The area of concern for the Western NSW Local Health District (WNSWLHD) is the potential for increased risk in the transmission of Q fever as a result of the transportation, handling and processing of lamb, sheep and goats should the proposed development be approved.

Q fever can be contracted by breathing in aerosols or dust when working with or handling infected animals, animal tissues or animal products. Infected animals often have no symptoms and can shed the bacteria into their urine, faeces or milk.

Q fever is also contracted by:

- Inhaling dust from infected wool, hides, straw or grass
- Handling the placenta or birth fluids of infected animals

In order for the WNSWLHD to be satisfied that any potential risks from Q fever can be identified and managed, it is recommended that an Environmental Health Risk Assessment be undertaken using the risk assessment model outlined in the *Guidelines for assessing human health risks from environmental hazards* published by enHealth in 2012.

The Environmental Health Risk Assessment should address the risks of Q fever associated with (but not limited to) the following areas:

Design of the abattoir - in particular high risk work areas such as:

- Kill floors
- Livestock transport vehicles
- Yards and pens
- Offal rooms
- Skin sheds

Dust suppression - in particular slaughter and animal housing areas and around the site in general

Wastewater disposal – in particular the microbiological quality of treated effluent that will be reused for irrigation and also the potential for the evaporation and drying out of effluent ponds which may release pathogens into the environment. Reference should be given to relevant guidelines where appropriate

Population Health covering Western NSW and
Far West Local Health Districts
PO Box 457, Kincumber House, Morgan St
Broken Hill NSW 2880
Telephone: 08 8080 1420
Facsimile: 08 8080 1196

Waste disposal – in particular the transport offsite of raw meat waste products (offal, bone, blood, fat and trimmings) and skins

Workplace Health and Safety - in particular addressing Workcover requirements for minimising the risk of Q fever

Water Security – in particular the contingency arrangements during drought events to ensure that adequate water is available for the safe, hygienic operation of the site

Stock Transportation – in particular the risk to the community as a result of increased stock transport through Bourke and its surrounds. Q fever is no longer considered solely as an occupational disease therefore the risk assessment will need to take into account community exposure from the transportation of rangeland or feral goats which have a higher risk profile than domesticated livestock in regard to Q fever. It is anticipated that the risk assessment will consider the number of truck movements, stock routes and data relating to confirmed cases of Q fever that have occurred in the district in previous years in order to characterise the risk to the community.

Comment is also sought on Lot 2 DP 753547 which is zoned R5 Large Lot Residential and located adjacent the site to clarify if this parcel of land is intended for residential use in the future.

Should you wish to discuss this matter further, please do not hesitate to contact me on 08 8080 1504.

Yours sincerely

David Ferrall
Senior Environmental Health Officer

22 October 2015