

7 October 2020

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Our ref: *D2020/105735*

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**Subject: Request for SEARs for Moss Vale Plastic Recycling Facility**

Water NSW appreciates the opportunity to provide input into the Secretary's Environmental Assessment Requirements (SEARs) or the proposed plastics recycling facility at 74-76 Beaconsfield Road, Moss Vale (SSD-9409987).

Water has reviewed the EIS Scoping Report prepared by GHD Pty Ltd (dated September 2020) and requests the following be considered in the Environmental Impact Statement (EIS).

As the development is located within the Sydney Drinking Water Catchment, clauses 9(1), 9(2) and 10(1) of the *State Environmental Planning Policy (Sydney Drinking Water Catchment) 2011* (the SEPP) apply. The EIS must specifically address each of these clauses, in particular a clear description and justification as to how the development would achieve a neutral or beneficial effect on water quality.

It is noted that Section 4.2.1 of the EIS scoping report incorrectly states that a NorBE assessment would be required using the NorBE tool. This development is not a type of development that use of the NorBE tool is applicable to under Clause 10(2) of the SEPP.

It is also noted that the facility would be accessed via Braddon Road, a currently unmade road. Clarification is required as to whether this will become a public road. If not, the road will need to be incorporated into the stormwater treatment plan and stormwater quality modelling associated with the development.

**Other requirements for SEARs**

The full description of the development and existing environment should also include those aspects which have the potential to impact on the quality and quantity of surface and/or ground waters at and adjacent to the site. This includes:

- a detailed plant design and layout, including temporary works and staging
- a description and location of all on-site water sources including during construction stage
- details of the proposed watercourse diversion including riparian restoration works implementation and monitoring
- the location, detailed design and operational management of any stormwater quality treatment and management measures and structures
- a detailed description and concept design of any chemical storages, and
- a description and location of construction site amenities including any temporary on-site wastewater management systems.

The following documents, plans and models should be submitted as part of the EIS to enable a complete and accurate assessment of potential water quality impacts:

- Concept Stormwater Management Plan(s) including location and details of any stormwater treatment management structures specific to each stage of the development.
- Stormwater Quality Modelling (in MUSIC software), demonstrating at least a 10% reduction in stormwater mean annual pollutant loads for total suspended solids (TSS), total phosphorus (TP) and total nitrogen (TN) from pre-development to post-development for Stage 1 and combined Stages 1 and 2.
- Conceptual Operational Environmental Management Plan(s) detailing the frequency and roles and responsibilities of maintenance of any water stormwater quality treatment measures.
- Concept Soil and Water Management Plan(s) including detailed design, staging, operation and maintenance of any clean and dirty water conveyance or treatment structures.
- Concept Riparian Vegetation Management Plan including details of implementation and staging.

Water NSW requests that it be listed as a stakeholder in any further consultation on this project and looks forward to reviewing the forthcoming Environmental Impact Statement.

If you wish to discuss this letter or the project more generally, please do not hesitate to contact Miles Ellis on 9865 2502 or e-mail [environmental.assessments@waterNSW.com.au](mailto:environmental.assessments@waterNSW.com.au).

Yours sincerely

A handwritten signature in black ink, appearing to read 'Clay Preshaw', with a stylized, cursive script.

**CLAY PRESRAW**  
**Manager Catchment Protection**