

Mr Mark Roberts
Element Environment
Senior Environmental Scientist
25 Kingfisher Way
WARRIEWOOD NSW 2102
26/10/2020

Dear Mr Roberts

Central Sydney Industrial Estate and Downer Sustainable Road Products Complex (SSD-10459)
Response to Submissions

The exhibition of the development application including the Environmental Impact Statement (EIS) for the above proposal ended on Friday 23 October 2020. All submissions received by the Department during the exhibition of the proposal are available on the Department's website at www.planningportal.nsw.gov.au/major-projects/projects.

The Department requires that you provide a response to the issues raised in those submissions, in accordance with clause 82(2) of the Environmental Planning and Assessment Regulation 2000. Please provide a response to the issues raised in these submissions Friday 27 November 2020. You are also required to submit additional information that addresses the issues identified in Attachment 1.

If there are any changes to the scope of the development which substantially changes the environmental impacts of the development as outlined in the EIS, exhibition of the proposed changes may be required in accordance with Schedule 1 of the *Environmental Planning and Assessment Act 1979*.

Note that under clause 113(7) of the Environmental Planning and Assessment Regulation 2000, the days occurring between the date of this letter and the date on which your response to submissions is received by the Secretary are not included in the deemed refusal period.

I note that at the time of writing the Department was still awaiting submission from the Environment Protection Authority, City of Parramatta Council and the Department's Water Branch which will be forwarded to you separately and required to be addressed as part of your response. If you have any questions, please contact David Koppers, who can be contacted on 9373 2869 or at david.koppers@planning.nsw.gov.au.

Yours sincerely



Chris Ritchie
Director
Industry Assessments

as delegate for the Planning Secretary

ATTACHMENT 1

Based upon the Department's review of the information of the EIS, the Department considers further information is required to clarify matters and address inconsistencies within the documentation. In this regard the following information is required to be provided:

Site Remediation:

1. Status of current remediation within the development area?

Water Management:

2. Did the flooding assessment consider the heights of the 1% AEP event?
3. Will the stormwater outlets have a maximum discharge rate?
4. Will the concentrated discharge of freshwater into Duck Creek impact on the health of the mangrove vegetation or marine life? Are there mitigation strategies for this?
5. Rainwater harvesting – are there any figures on anticipated total annual collection volumes and annual usage figures to support the conclusions of Table 13.5?

Environmental Management:

6. Does the 2m deep inground pit intercept natural ground material or pose any Acid Sulfate Soil issues?
7. Were options considered to widen the riparian corridor?
8. Section 18.3.3 - What happens if asbestos material is transported to the Downer operations? The controls assume it is not possible – this seems unrealistic?

Air Quality

9. What is the current extent of existing annual PM10/2.5 exceedances in the locality?
10. Did the air quality assessment give consideration to workers being onsite throughout the day at Receiver C1? It reads differently to the way the assessment considered the industrial receivers and that it applied impacts to visitors to the site and not workers. The EIS states there are no additional exceedance days due to the development but there is no evidence in the EIS to support this statement – for example Table 10.9 and 10.10 show increases at receiver C1 from compliant to an exceedance. Are there existing background levels available for the information in these two tables?

11. Are the exceedances in Table 10.9 and 10.10 pre or post mitigation measure as listed in Table 10.13?
12. Why is the road within the RAP area unsealed?
13. If EPA criteria doesn't apply to industrial sites why are the results being reported as non-compliances in the EIS?

Clarifications:

14. Confirm the recovery rate for the reconomy facility – page x states 60%, Section 2.4 states 95%?
15. Confirm intention of construction activities? Conflicting statements where EIS states that construction will essentially occur across a 24/7 period as required, other sections state construction within standard construction hours?