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Dear Mr Nixey

Telopea Concept Plan and Stage 1A – (SSD 14378717)
EPA Advice on draft Secretary's Environmental Assessment Requirements (SEARs)

I am writing to you to in reply to your invitation to the NSW Environment Protection Authority (EPA) to provide comments on the draft SEARs for the above State Significant Development (SSD) proposal.

The EPA understands from the scoping report that the Concept proposal comprises 60 hectares of suburban redevelopment to accommodate 4,700 dwellings, new retail, childcare, library, church and aged care facility, public open space and road upgrades; and Stage 1A comprises a 20,500 sqm section of the precinct to be redeveloped to accommodate a new Light Rail plaza, community pavilion, new landscaping and footpath alignments, public park, and residential flat buildings up to 10 storeys in height.

The EPA provided advice regarding the Telopea Precinct Proposal in a letter dated 29 November 2017 (REF DOC17/563777-18:PW) (see separate **Attachment**). That advice remains relevant. Some of the following comments regarding the SEARs references parts of this letter:

7. Environmental amenity – the EPA notes the requirement to demonstrate a high level of environmental amenity within the proposal and on surrounding buildings, assessing impacts associated with view loss, ventilation, pedestrian movement, access to outdoor spaces, visual privacy, lighting and wind. The EPA requests that design requirements include noise control as stated in the EPA's letter of 29.11.17 which requested careful design and location of the development to provide the greatest opportunity to manage noise (section 2. Noise).

Further to this and in relation to land use conflict, the EPA requests the applicant ensure consideration of the interface between the commercial and residential uses, and careful placement of operational plant to avoid impacts to sensitive receivers (section 3. Land Use Conflict).

22. Stormwater and Drainage – the EPA reiterates the advice from its letter of 29.11.17, noting that the *NSW Water Quality Objectives* (WQO) provide a framework and benchmark for community uses and values of waterways and water quality needed to support these. The EPA requests consideration of Planning Priority C13 of the *Central City District Plan* (Greater Sydney Commission, 2018) which is: *Protecting and improving the health and enjoyment of the District's waterways*. The EPA

considers that the water management principles articulated in its letter (29.11.17) should underpin stormwater management for the Telopea Precinct Concept and Stage 1A development:

- Development that maintains, improves or restores water quality and waterway health to support the community's environmental values and uses of waterways; and
- Integrated water cycle management that includes sustainable water supply, wastewater and stormwater management and reuse and recycling initiatives where it is safe and practicable to do so and provides the best environmental outcome.

In this regard the *Risk based Framework for Considering Waterway Health Outcomes in Strategic Land-use Planning Decisions (Risk-based Framework)* (OEH/EPA 2017) should be consulted to help inform the design of the development and identify measures to mitigate waterway impacts to support the above principles.

26. Waste and Servicing (Stage 1A only) – the EPA notes the requirement to identify, quantify and classify the likely waste to be generated during construction and operation, as well as efforts to minimise, reuse, recycle or dispose of waste, and identify the servicing arrangements. The EPA reiterates previous advice regarding waste management design contained in its letter of 29.11.17 (5. Waste Management), and requests the applicant to consider the implementation of innovative waste and resource recycling measures guided by recent EPA documents including *Better practice guide for resource recovery in residential developments* (EPA, 2019) and *Circular Economy Policy* (EPA, 2019) to deliver the *NSW Waste Avoidance and Resource Recovery Strategy 2014-21* (EPA, 2014). Note too the potential for waste to impact onsite air quality and how this is considered in the air quality assessment under SEAR number **25. Air Quality (Stage 2 only)**.

Should you wish to discuss any of the matters raised above, please contact Anna Timbrell on 9274 6345 or email anna.timbrell@epa.nsw.gov.au

Yours sincerely



SARAH THOMSON
A/Manager Regulatory Operations Metro South

Encl. Previous EPA advice reference DOC17/563777-18 dated 29 November 2017