



Request for Secretary's Environmental Assessment Requirements

Proposed Plant 2 Upgrade Works

780 Wallgrove Road, Horsley Park

Prepared by Willowtree Planning Pty Ltd on behalf of
Brickworks Land and Development

October 2018

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PART A PRELIMINARY

1.1 INTRODUCTION

This Scoping Report has been prepared by Willowtree Planning Pty Ltd on behalf of Brickworks Land and Development (Brickworks – referred to as the Applicant hereafter) and is submitted to the NSW Department of Planning and Environment (DP&E) in support of a formal request for Secretary's Environmental Assessment Requirements (SEARs).

The Applicant is proposing to carry out upgrade works to the existing Brickmaking Plant (known as Plant 2), to implement best practices and increase efficiencies associated with the operation. The proposed development seeks consent for the upgrade works which will ensure the production of bricks can continue to meet the operational needs of Brickworks.

The site is located within the Fairfield City Council Local Government Area (LGA) and forms part of the Western Sydney Parklands (WSP), thus, it is subject to the provisions of *State Environmental Planning Policy (Western Sydney Parklands) 2009* (WSP SEPP). The identified land portion is not currently zoned; however, pursuant to Clause 11(2) of the WSP SEPP, the proposal represents an innominate development. Therefore, under this clause the proposed development would be considered permissible with formal consent provided by NSW DP&E.

Additionally, the proposed development satisfies the definition of State Significant Development (SSD) pursuant to Schedule 2 Part 5 of *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP) as the Capital Investment Value (CIV) exceeds more than \$10 Million.

This Scoping Report provides a brief overview of the proposed development and the relevant planning framework that applies to enable the issuance of the SEARs that would guide the preparation of a formal Environmental Impact Statement (EIS) for future development of the land.

Environmental considerations relevant to the proposed development have been identified to include:

- Soil and water;
- Noise;
- Air quality;
- Flora and fauna;
- Waste;
- Traffic and transport;
- Visual amenity and site design;
- Infrastructure and services;
- Social Impacts; and,
- Economic Impacts.

The proposed development would promote the enhanced development of the Western Sydney Region, ultimately providing increased efficiencies to the existing long-term employment generating operation which exists on the site.

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PART B SITE ANALYSIS

2.1 SITE LOCATION & EXISTING CHARACTERISTICS

The subject site is identified as 780 Wallgrove Road, Horsley Park (Lot 7 in Deposited Plan 1059698). The entire site is 82 hectares in area and is the main brick manufacturing site for the Austral Brick Company. Two significant brick factories are located on the land together with associated stockpile areas and hardstand areas. The main office for Brickworks Limited and the main Austral Bricks sales office are also located on the site.

The present condition of the site is such that it contains existing stockpiles of clay and two facilities that is used for the purpose of brick manufacturing. The site is predominately clear of vegetation due to the historic land use being for quarrying and brick manufacturing.

Adjoining to the west is the M7 Motorway which links with the M2, M4 and M5 motorways. Surrounding development predominately comprises industrial facilities used for the purpose of warehousing and distribution and various extractive industries.

The particulars of the existing operation on the site are as follows:

- The existing development operates under Environmental Protection Licence No. 546 which relates to the "Austral Brick Plants 1, 2 and 3" (the EPA Licence).
- The EPA Licence permits *ceramic works* and specifically, the production of 200,000 tonnes of ceramics per annum.
- The EPA Licence also permits the crushing, grinding or separating of between 500,000 and 2,000,000 tonnes of material annually.

An aerial photograph of the site, that illustrates the site characteristics is provided in **Figure 1** below; and, a subsequent cadastral image is provided in **Figure 2**.

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Figure 1: Site Layout and Surrounding Site Characteristics

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2.2 SITE/STRATEGIC CONTEXT

The site forms part of the WSP, which comprises a 27 km urban park corridor running north from Quakers Hill, south to Leppington accounting for approximately 5,280 hectares of land. Along its trajectory it crosses various LGAs including, Liverpool, Blacktown and Fairfield. The extent of the WSP is shown in **Figure 2**.

The *Western Sydney Parklands Plan of Management 2020 Supplement* (WSP POM) was formally adopted by the Minister for Environment, Minister for Heritage on 2 March 2014. The WSP POM outlines the main principles, strategic directions, and desired objectives and outcomes with regard to the WSP. The WSP POM considers the wider regions exponential urban growth potential (expected to reach 3 million people by 2036); and, the Plan's overall capacity to contribute to the anticipated economic value, in terms of development and employment in the region. Additionally, it envisages the maintenance of social / recreational and environmental values and considerations.

As detailed within the WSP POM, the site is clearly delineated as 'Austral Bricks', thus reinforcing that the land is a clear exception to any other freehold parcels due to its long term working character and employment contribution (refer **Figure 2**).

The continues operation of the brickmaking plant would not undermine the objectives of the WSP POM, or surrounding land uses within the locality.

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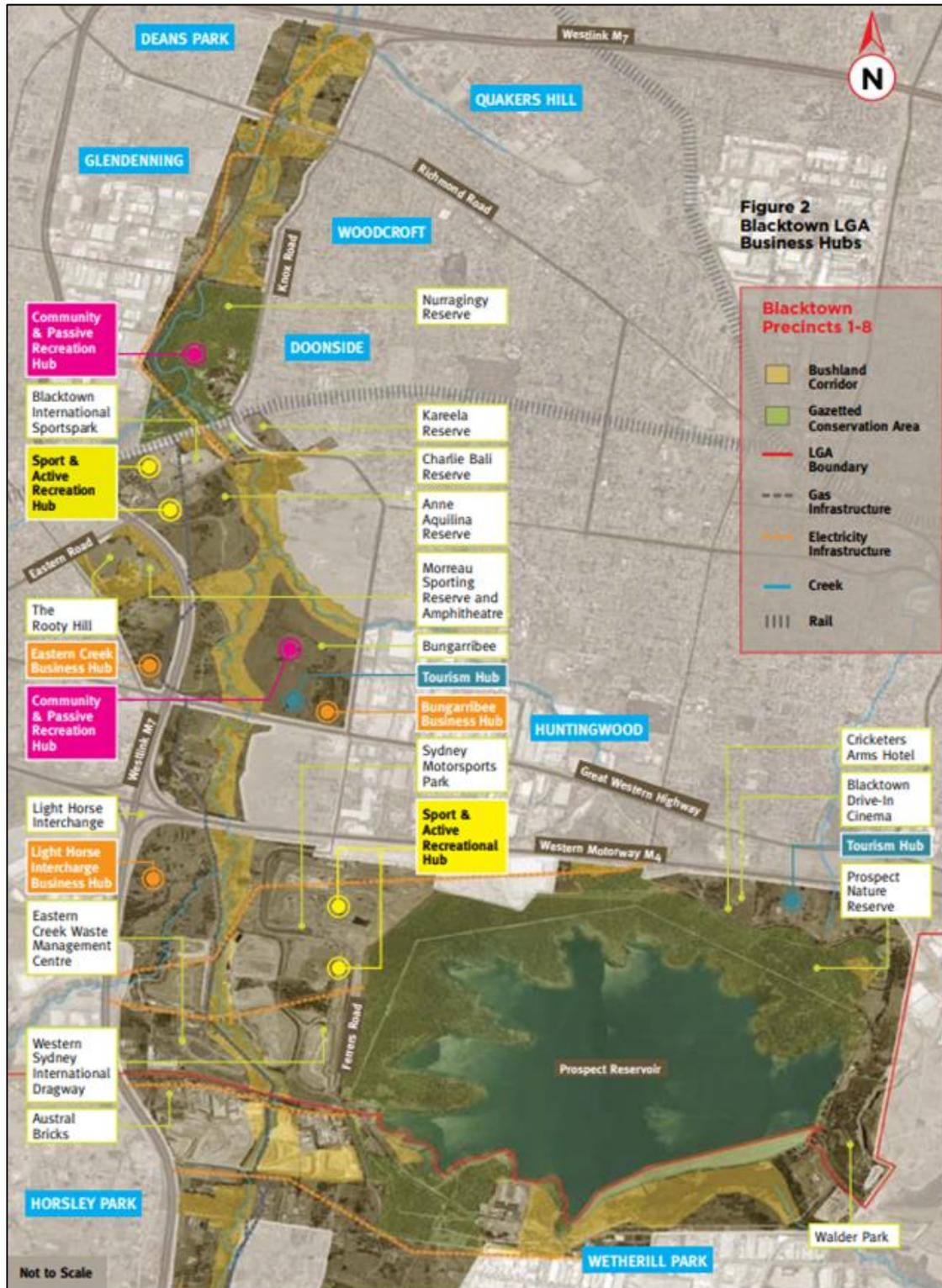


Figure 2: Western Sydney Parklands Extent and Land Use Framework Plan

PART C PROJECT SUMMARY

3.1 AIMS AND OBJECTIVES OF THE PROPOSED DEVELOPMENT

The following objectives have been identified as forming the basis of the proposed development with regard to the proposed Part 2 upgrade works:

- Design the site to achieve a viable economic return;
- Ensure minimal environmental and amenity impact;
- Ensure ongoing compliance with all operational legislative requirements;
- Provide for an employment-generating land use; and,
- Ensure development is compatible with surrounding development and the local and regional context

The site and proposed design are considered to meet the objectives of the project as it allows for development on land that has been previously disturbed and used for industrial purposes within the Western Sydney Parklands.

A Preliminary site plan is provided below for reference (**Figure 3**).

3.2 DESCRIPTION OF THE PROPOSED DEVELOPMENT

Consent is sought to carry out upgrade works to the existing brickmaking plant, to achieve optimal efficiency outcomes in line with best practice. There will be no increase to the 80,000 bricks which are produced on the site annually.

The scope of the proposal is as follows:

1. New Building –extended kiln car storage and relocated de hacker
3,500m² – New building to match in with existing. Area required for additional kiln car storage (fired product) and will include extended kiln rails only. Existing de-hacker to be relocated into this area to create easier access for forklifts.
2. New Building – consolidated additives area and regularisation of building
1,600m² – new building to match existing. Consolidation of additives area and new environmental measures to prevent additive spills. Building is also being regularised and existing maintenance area expanded.
3. New Footings for relocated clay bins and conveyor system
New footings to allow the relocation of the existing clay bins from the front of the factory into the pit area. New Footings for a conveyor system. This will reduce dust associated with using the haul roads at the front of the property.
4. New Building – additional undercover stockpile area
1,000m² – new building to match existing clay storage building to increase undercover stockpile area. This will help reduce the number of external stockpiles and reduce dust issues.
5. New Kiln – same capacity as existing kiln
One new kiln to replace existing 2 kilns. 80 million bricks per annum capacity remains unchanged.
6. New Footings for scrubber
New footings for scrubber to be attached to the existing kiln stack.

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A preliminary concept development plan is provided at **Appendix 1**. This plan also shows the general layout of the machinery within the buildings as existing.

3.3 OPERATIONS AND PROCEDURES

Plant 2 current operates as a face brick plant with an annual output of 80 million bricks. The operation is currently run by 30 employees. The existing brick kiln and associated equipment was commissioned in the late 1960's. It is in good condition and could operate for over 20 years, as the technology for brick making has not changed significantly since this time. The current kiln, however, losses heat and requires large amounts of gas to run. There are also no environmental controls on the emissions from the kiln, which has been raised by the EPA as an ongoing issue.

The purpose of the upgrades is not to change the operation or the output but to address the environmental issues with the kiln in relation to gas usage and emissions. The new building will provide for the extension of the kiln car storage area and the relocation of the existing de-hacker, both of which will improve circulation in the factory and emergency egress thus addressing occupational health and safety issues. Part of the extension will be used to create a proper glazed storage and application area, which will be bunded to address environmental issues associated with the glazes. Other works, including the removal of the asbestos roof, installation of solar panels and fire upgrades are all required to meet current standards, provide a safe work place for our employees and address environmental issues.

The proposed works will have minimal impact on the actual existing operations as capacity will not increase. There will be no change in the employee numbers, which will remain at 30. The carpark, which currently consists of 55 spaces, will be retained. New staff amenities will be included in the building extension, to meet current employment standards. Traffic numbers will also not be affected by the refurbishment, as the capacity does not change.

3.4 STAGING OF DEVELOPMENT

The approval strategy sought, seeks to obtain development consent to complete the construction works over multiple stages to ensure the operation of Plant 2 can continue; however, any such staging does not constitute staged development as defined under Section 4.22 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The building and kiln works are expected to take six months to complete. The factory will be closed during this process, so traffic should remain stable with the construction traffic replacing the operational traffic. The kiln, whilst assembled on site, consists of pre-fabricated units. The noise from the kiln installation and construction of the building is not expected to be greater than the current operational noise associated with running the factory.

3.5 CAPITAL INVESTMENT VALUE

While costs have not yet been finalised, the Capital Investment Value (CIV) of this project is expected to be approximately \$17.5 Million. The costs will be finalised once the final design is confirmed.

As this exceeds the \$10 Million threshold under Schedule 2 Part 5 of the SRD SEPP, the proposed development is considered SSD.

A preliminary Cost Report is attached to verify the CIV (refer to **Appendix 2**).

3.6 CONSULTATION

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Consultation is currently being undertaken with the following stakeholders:

- Fairfield City Council;
- NSW Office of Water;
- Office of Strategic Lands;
- Western Sydney Parklands Trust;
- Water NSW;
- NSW DPI Water;
- NSW Roads and Maritime Services;
- Transport for NSW;
- Endeavour Energy;
- Jemena;
- Office of Environment and Heritage; and
- Surrounding landowners.

Consultation with relevant stakeholders will be undertaken whilst preparing a detailed Environmental Impact Statement in keeping with the Department's Major Project Community Consultation Guidelines.

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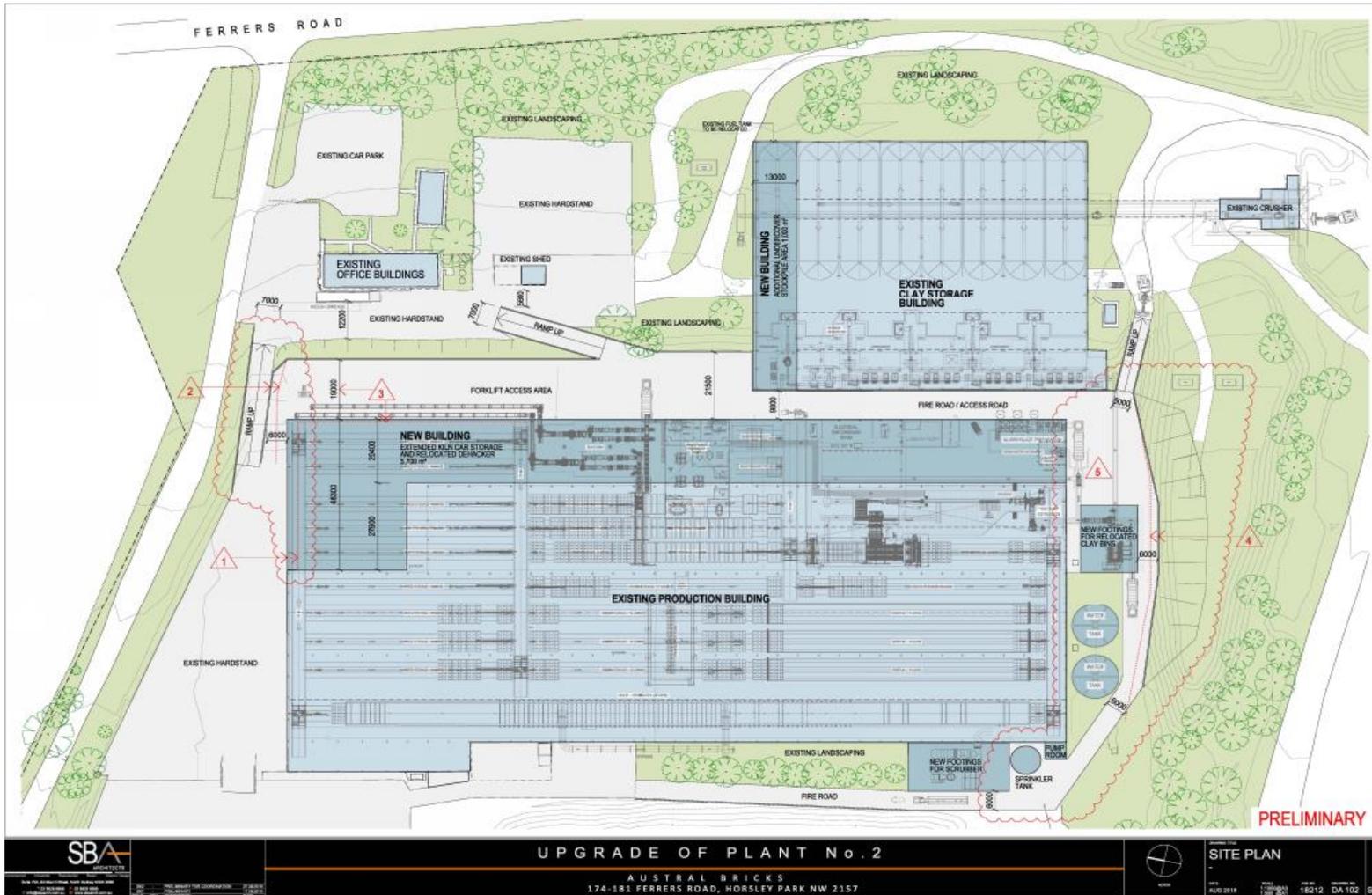


Figure 3: Proposed Preliminary Site Plan

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PART D JUSTIFICATION

The intention of the proposed development is to rationalise the existing brickmaking plant by carrying out various upgrade works. It is considered that the proposed development:

- Is compatible with surrounding development and the local context;
- Would continue to generate employment opportunities, thus contributing to the growth of Western Sydney;
- Would provide increased operational efficiencies for the brickmaking plant;
- Would result in minimal impact on the environment, in particular the Western Sydney Parklands; and
- Would allow for the implementation of suitable mitigation measures where required.

The proposed development would enhance the operations presently undertaken on the site and ensure that it does not detract from the WSP. Overall, the scale of development proposed is considered minor, and the built form changes would be indiscernible having regard to the bulk and scale of the existing development. Furthermore, this would be achieved by the resultant built form that would reinforce the working character of the land.

It is noted that Austral has an existing approval to manufacture 80 million bricks per annum at this plant. The works are considered refurbishments and upgrades to meet current standards. An entirely new consent is not warranted.

The options considered, and subsequently dismissed, in arriving to the current proposal included:

(a) 'Do Nothing' Scenario

This option was dismissed as the objectives of the project would not be met. If the proposed development was not to proceed, the site would continue to be used for brickmaking purposes, however the implementation of best practices and environmental improvement would not be achieved.

(b) Development on an Alternative Site

Consideration was given to carrying out development on alternate sites; however, these were dismissed as the site resulted in the most beneficial outcomes for the proposed development as:

- The site is suitably located with respect to sensitive land activities including residential development;
- All potential environmental impacts concerning the proposed development are able to be suitably mitigated, in particular air and noise;
- The proximity to the regional road network (M4 & M7 Motorways) provides accessibility and linkages to the broader metropolitan area and regional areas of NSW;
- The proposed development demonstrates the capability for continued employment-generating opportunities, during both the construction and operational phases;
- The proposed development would not adversely affect any area of heritage or archaeological significance; and,
- The proposed development could be developed with the appropriate visual amenity achieved given its surrounding context.

The proposed development is justified on the basis it is compatible with the locality in which it is proposed, resulting in economic benefits while managing and mitigating environmental impacts.

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PART E LEGISLATIVE AND POLICY FRAMEWORK

The following current and draft Commonwealth, State, Regional and Local planning controls and policies have been considered in the preparation of this Report:

Commonwealth Planning Context

- *Environmental Protection and Biodiversity Conservation Act 2016*

State Planning Context

- *Environmental Planning and Assessment Act 1979*
- *Environmental Planning & Assessment Regulation 2000*
- *Protection of the Environment Operations Act 1979*
- *Biodiversity Conservation Act 2016*
- *State Environmental Planning Policy (State and Regional Development) 2011*
- *State Environmental Planning Policy (Western Sydney Parklands) 2009*
- *State Environmental Planning Policy (Infrastructure) 2007*
- *State Environmental Planning Policy No.33 – Hazardous and Offensive Development*
- *State Environmental Planning Policy No. 55 – Remediation of Land*
- *State Environmental Planning Policy No.64 – Advertising Structures and Signage*

Local Planning Context

- *Blacktown Local Environmental Plan 2015*
- *Blacktown Development Control Plan 2015*

This planning framework is considered in detail in the following sections.

5.1 ENVIRONMENTAL PROTECTION AND BIODIVERSITY CONSERVATION ACT 1999

Under the *Commonwealth Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), any action (which includes a development, project or activity) that is considered likely to have a significant impact on Matters of National Environmental Significance (MNES) (including nationally threatened ecological communities and species and listed migratory species) must be referred to the Commonwealth Minister for the Environment. The purpose of the referral is to allow a decision to be made about whether an action requires approval on a Commonwealth level. If an action is considered likely to have significant impact on MNES, it is declared a "controlled action" and formal Commonwealth approval is required.

Based on preliminary investigations carried out, the proposal does not warrant referral to the Commonwealth Minister for Environment.

5.2 ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979

The EP&A Act is the overarching governing statute for all development in NSW and pursuant to Section 4.36(2) provides that:

A State environmental planning policy may declare any development, or any class or description of development, to be State significant development.

The proposed development has been identified as State Significant Development under the SRD SEPP.

5.3 ENVIRONMENTAL PLANNING AND ASSESSMENT REGULATION 2000

Section 4(1) of the Environmental Planning and Assessment Regulation 2000 (EP&A Regulation) states that:

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Development described in Part 1 of Schedule 3 is declared to be designated development for the purposes of the Act unless it is declared not to be designated development by a provision of Part 2 or 3 of that Schedule.

The proposal being for upgrade works to an existing brickmaking plant does not trigger the designated development thresholds.

5.4 PROTECTION OF THE ENVIRONMENT OPERATIONS ACT 1979

Schedule 1 of the *Protection of the Environment Operations Act 1979* (POEO Act) contains a core list of activities that require a licence before they may be undertaken or carried out. The definition of an 'activity' for the purposes of the POEO Act is:

"an industrial, agricultural or commercial activity or an activity of any other nature whatever (including the keeping of a substance or an animal)."

The proposal would not involve any variation to the existing licences which exist for the operations carried out on the site. As previously mentioned, the production capacity for the proposal is to remain unchanged.

5.5 BIODIVERSITY CONSERVATION ACT 2016

The *Biodiversity Conservation Act 2016* (BC Act) is the key piece of legislation in NSW relating to the protection and management of biodiversity and threatened species. The purpose of the BC Act is to maintain a healthy, productive and resilient environment for the greatest well-being of the community, now and into the future, consistent with the principles of ecologically sustainable development. The BC Act is supported by a number of regulations, including the *Biodiversity Conservation Regulation 2017* (BC Regulation).

The BC Act requires consideration of whether a development or an activity is likely to significantly affect threatened species. Preliminary studies have been undertaken to assess the overall ecological context of the subject site; however, further studies would be undertaken and addressed within the EIS regarding potential impacts to flora and fauna species, including Cumberland Plain Woodland.

The extent of vegetation removal proposed does not trigger further detailed assessment under the BC Act.

5.6 STATE ENVIRONMENTAL PLANNING POLICY (STATE AND REGIONAL DEVELOPMENT) 2011

Proposals involving activities that are listed in Schedule 2 of *State Environmental Planning Policy (State and Regional Development) 2011* (SRD SEPP) are identified as being SSD.

Part 5 of Schedule 2 states:

5 Development in the Western Parklands

Development that has a capital investment value of more than \$10 million on land identified as being within the Western Parklands on the Western Sydney Parklands Map within the meaning of State Environmental Planning Policy (Western Sydney Parklands) 2009.

The CIV of the entire project is in excess of \$10 Million, thus the SSD provisions apply.

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5.7 STATE ENVIRONMENTAL PLANNING POLICY (WESTERN SYDNEY PARKLANDS) 2009

The aims of the WSP SEPP are:

- a) *allowing for a diverse range of recreational, entertainment and tourist facilities in the Western Parklands, and*
- b) *allowing for a range of commercial, retail, infrastructure and other uses consistent with the Metropolitan Strategy, which will deliver beneficial social and economic outcomes to western Sydney, and*
- c) *continuing to allow for and facilitate the location of government infrastructure and service facilities in the Western Parklands, and*
- d) *protecting and enhancing the natural systems of the Western Parklands, including flora and fauna species and communities and riparian corridors, and*
- e) *protecting and enhancing the cultural and historical heritage of the Western Parklands, and*
- f) *maintaining the rural character of parts of the Western Parklands by allowing sustainable extensive agriculture, horticulture, forestry and the like, and*
- g) *facilitating public access to, and use and enjoyment of, the Western Parklands, and*
- h) *facilitating use of the Western Parklands to meet a range of community needs and interests, including those that promote health and well-being in the community, and*
- i) *encouraging the use of the Western Parklands for education and research purposes, including accommodation and other facilities to support those purposes, and*
- j) *allowing for interim uses on private land in the Western Parklands if such uses do not adversely affect the establishment of the Western Parklands or the ability of the Trust to carry out its functions as set out in section 12 of the Western Sydney Parklands Act 2006, and*
- k) *ensuring that development of the Western Parklands is undertaken in an ecologically sustainable way.*

The proposed development is consistent with the aims of the SEPP in that it would ensure the continued use of a site that has historically operated for employment generating purposes. The overall connectivity of the WSP would not be compromised given the minor scale of the development.

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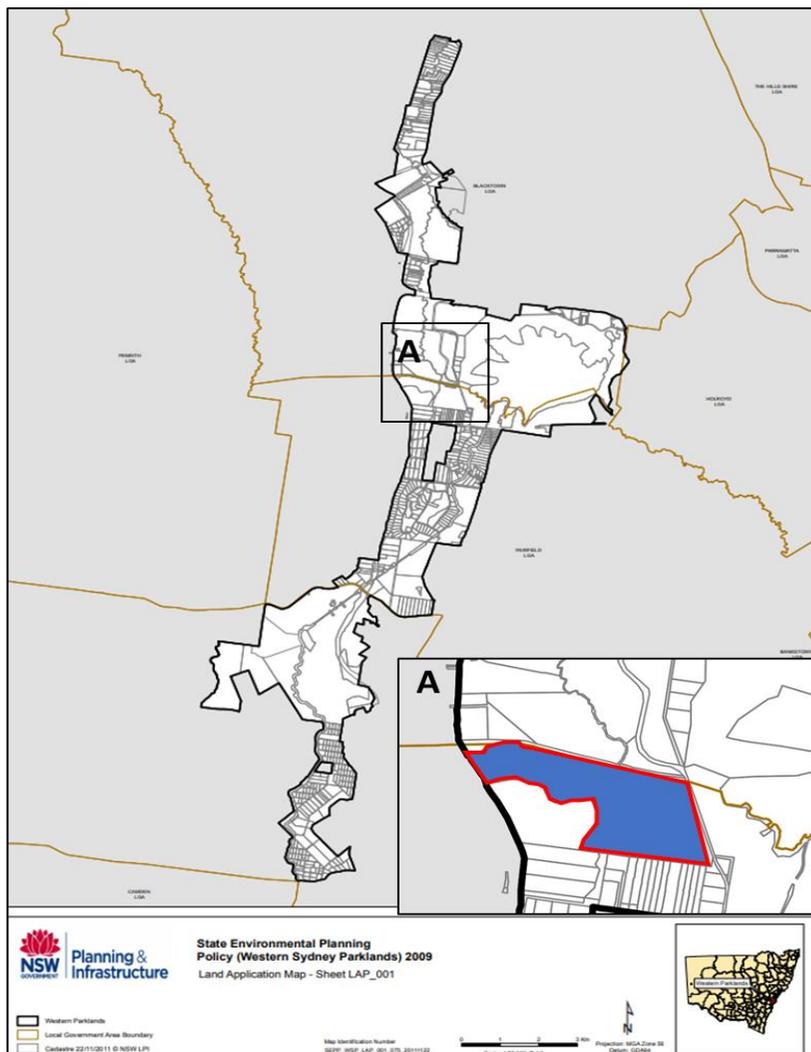


Figure 4: Western Sydney Parklands Land Application Map

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Land Use and Permissibility

All land within the WSP is unzoned under the provisions of the WSP SEPP. Pursuant to Clause 11(2), the proposal represents an innominate development and is therefore permissible with consent.

The following matters require consideration by a consent authority when applying for development consent on land within the WSP. An assessment of the preliminary scheme is provided below.

Table 1: WSP SEPP General Matters for Consideration (Part 2, Clause 12)	
Matters	Comments
<i>(a) the aim of this Policy, as set out in clause 2</i>	The proposed development is consistent with this aim as it provides for development within the Parklands that would be consistent with the existing approval and operation of the site.
<i>(b) the impact on drinking water catchments and associated infrastructure,</i>	The works are to be contained within the property boundaries. No impact on drinking water or associated infrastructure is anticipated.
<i>(c) the impact on utility services and easements,</i>	The proposed development is minor in nature with respect to the footprint of the existing buildings on the site. It will therefore not adversely impact on utility services or easements.
<i>(d) the impact of carrying out the development on environmental conservation areas and the natural environment, including endangered ecological communities,</i>	The proposal is to be contained within areas which are already highly disturbed thus, the impact on any environmental conservation areas is considered minor.
<i>(e) the impact on the continuity of the Western Parklands as a corridor linking core habitat such as the endangered Cumberland Plain Woodland,</i>	The proposal is to be contained within areas which are already highly disturbed thus, will not impact on any corridor linking core habitat.
<i>(f) the impact on the Western Parkland's linked north-south circulation and access network and whether the development will enable access to all parts of the Western Parklands that are available for recreational use,</i>	As the proposed development is to be contained within the area of the site that is heavily disturbed and is surrounded by buildings and hardstand, there will be no impact on the Western Parklands north-south circulation.
<i>(g) the impact on the physical and visual continuity of the Western Parklands as a scenic break in the urban fabric of western Sydney,</i>	The proposed development is to be located within a cluster of existing buildings and hardstand, which are generally not visible from the public domain, thus there will be no undue impact on the visual continuity of the Western Sydney Parklands.
<i>(h) the impact on public access to the Western Parklands,</i>	The nature of the activities would not restrict access to the Western Sydney Parklands. It is noted that public access through the site is presently not available.
<i>(i) consistency with: (i) any plan of management for the parklands, that</i>	The proposed development would achieve consistency with the WSP Plan of Management 2020 Supplement.

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<i>includes the Western Parklands, prepared and adopted under Part 4 of the Western Sydney Parklands Act 2006, or</i> <i>(ii) any precinct plan for a precinct of the parklands, that includes the Western Parklands, prepared and adopted under that Part,</i>	
<i>(j) the impact on surrounding residential amenity,</i>	The site does not directly adjoin any residential areas.
<i>(k) the impact on significant views,</i>	The proposed development would be carried out within an area which is surrounded by a cluster of buildings and will be of a height that is not visible from the public domain.
<i>(l) the effect on drainage patterns, ground water, flood patterns and wetland viability,</i>	The area of the site to be developed is not subject to flooding.
<i>(m) the impact on heritage items,</i>	The proposed development is to be sufficiently separated from any heritage items.
<i>(n) the impact on traffic and parking.</i>	There will be no increase in truck movements or employee numbers, thus additional parking is not required.

Below in **Table 3** is a summary of the WSP SEPP provision as they apply to the proposal.

Table 2: WSP SEPP Provisions	
Clause	Comment
Clause 12 – Matters to be Considered by the Consent Authority - Generally	Refer above to Table 3 .
Clause 13 – Bulk Water Supply Infrastructure not to be Impacted	The proposed development will not impact any bulk water supply infrastructure.
Clause 14 – Development in Areas Near Nature Reserves or Environmental Conservation Areas	The proposed development is not located within an area designated for a nature reserve and / or an environmental conservation area.
Clause 14A – Flood Planning	The portion of the site to be developed is not identified as flood prone.
Clause 15 – Heritage Conservation	The portion of the site to be developed has not been identified containing any heritage significance given its highly disturbed state.
Clause 16 – Signage	No signage is proposed.

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Clause 17 – Development on Private Land	It is proposed to execute a Deed between the Minister and Brickworks to relinquish and costs associated with the works which constitute development under the subject proposal. Note this deed will not account for existing development on the site.
Clause 17A – Essential Services	Existing services would be augmented accordingly for the proposed development. Any works in this respect would be at no cost to the Government.
Clause 17B – Earthworks	All proposed earthworks would be conducted in a staged manner, and account for any environmentally sensitive factors implementing mitigation measures where possible.
Clause 19A – Preservation of Tress or Vegetation	Preliminary ecological investigations have revealed that there is a 'low' likelihood of impacting any threatened flora and fauna species; however, further studies would be conducted and assessed as part of the EIS.
Clause 20 – Bush Fire Hazard Reduction	Desktop analysis has revealed the Site is situated on bushfire prone land being described as 'Vegetation Buffer. Further bushfire assessment would be undertaken and assessed throughout the subsequent EIS.

5.8 STATE ENVIRONMENTAL PLANNING POLICY (INFRASTRUCTURE) 2007

The referral thresholds for 'Industry' development are:

- 20,000m² or more in area with site access to any road; or
- 5,000m² or more in area where the site has access to a classified road or to a road that connects to a classified road (if access is within 90 metres of connection, measured along the alignment of the connecting road).

Due to the minor increase to the footprint of the existing buildings, and the fact there will be no additional traffic generation, referral to RMS under the SEPP is not considered necessary.

5.9 STATE ENVIRONMENTAL PLANNING POLICY NO. 33 – HAZARDOUS AND OFFENSIVE DEVELOPMENT

As the proposal involves only minor upgrade works, there would be no additional dangerous goods proposed.

5.10 STATE ENVIRONMENTAL PLANNING POLICY NO. 55 – REMEDIATION OF LAND

Under the provisions of *State Environmental Planning Policy No. 55 – Remediation of Land* (SEPP 55), where a development application is made concerning land that is contaminated, the consent authority must not grant consent unless:

- it has considered whether the land is contaminated, and*
- if the land is contaminated, it is satisfied that the land is suitable in its contaminated state (or will be suitable, after remediation) for the purpose for which the development is proposed to be carried out, and*
- if the land requires remediation to be made suitable for the purpose for which the development is proposed to be carried out, it is satisfied that the land will be remediated before the land is used for that purpose.*

In conjunction with minor earthworks for the proposal, contamination investigations would be undertaken to assess and determine the likelihood for the extent of remediation works required under the SSD.

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PART F ENVIRONMENTAL ASSESSMENT

A screening analysis of the environmental issues applicable to the proposal is presented in **Table 3** below. This risk-based analysis has been used to identify the key environmental issues for further assessment, and assist the preparation of the SEARs for the proposed development.

The analysis is based on preliminary environmental assessment of the site only. The EIS for the proposal will fully address these items and other environmental issues relevant to the proposal.

Table 3: Environmental Risk Assessment	
Issue	Analysis
Soil and water	<ul style="list-style-type: none">▪ During construction, an Erosion and Sediment Control Plan would be implemented to protect the downstream drainage system and receiving waters from sediment-laden runoff.▪ Earthworks would be designed to minimise the extent of cut and fill and allow the balance of soil to be re-used on-site. Top soil would be stockpiled for re-use within landscaped areas where possible.
Noise	<ul style="list-style-type: none">▪ The site is sufficiently separated from any sensitive receivers.▪ The SSD Application would consider operational impacts and the resultant acoustic impacts having regard to the Environment Protection Authority Industrial Noise Criteria.
Air Quality	<ul style="list-style-type: none">▪ Given the nature of the proposed development being for upgrade works to the existing brickmaking plant, air quality impacts would be considered accordingly.▪ During construction, air quality would be managed through appropriate dust mitigation measures.▪ An Air Quality Impact Assessment Report prepared by a suitably qualified expert would accompany the EIS.
Waste	<ul style="list-style-type: none">▪ Operational waste would be managed in accordance with a Plan of Management for the Site.▪ Waste generated throughout the construction phase would be disposed of in accordance with a Waste Management Plan, which makes provision for recyclables and suitable off-site disposal.
Traffic & Transport	<ul style="list-style-type: none">▪ Suitable provision is made to accommodate and service the development in terms of traffic and transport. On-site car parking is proposed to be retained as existing.
Other Infrastructure & Services	<ul style="list-style-type: none">▪ All essential infrastructure services would be augmented accordingly for the proposed development, including water, sewer, electricity and communications.
Visual Amenity / Urban Design	<ul style="list-style-type: none">▪ The built form would be designed to incorporate architectural elements that articulate the façades and provide a sufficient level of visual amenity within the public domain.▪ Given the location of the proposed upgrade works, any new built structures would not be highly visible.
Hazards	<ul style="list-style-type: none">▪ Any hazardous materials and / or DGs proposed within applicable warehouses would undergo separate assessment via a SEPP 33 Report.

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Site Layout and Design	<ul style="list-style-type: none">▪ The site layout and design respond to the site constraints, thus providing a highly functional development which enhances the visual amenity of the locality.▪ Suitable provision is made for service vehicles within the Site. Detailed swept paths would be provided within the EIS and Traffic Impact Assessment.
Socio / Economic	<ul style="list-style-type: none">▪ The proposed development would positively impact on the social and economic conditions of the Fairfield LGA and WSP. Construction jobs are expected to be in the order of 50-100, while operational jobs are expected to only be increased marginally.

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PART G CONCLUSION

The proposed development would equate to a CIV of more than \$10 Million, thus the proposed development is defined as SSD pursuant to Schedule 2, Part 5 of the SRD SEPP.

The site is situated within the WSP and is complimented by surrounding developments of similar contextual importance; therefore, the site is considered highly suitable for the proposed development, given industrial related uses.

The proposed development is considered to align continue to support employment-generating opportunities within the wider Western Sydney region. Furthermore, the site is located within close proximity to housing and key infrastructure. In this respect, the proposed development would provide for economic growth and prosperity with regard to the Fairfield LGA.

Additionally, as noted throughout this Report, the proposed development would be carried out in an environmentally sustainable manner and would further implement suitable mitigation measures to ensure that the amenity and function of surrounding land uses would not be compromised.

It is requested that NSW DP&E issue formal SEARs for the preparation of an EIS for the proposed development as SSD.

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APPENDIX 1
Preliminary Site Plan

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APPENDIX 2
Preliminary Cost
Report