



Ms Mandana Mazaheri
A/Team Leader
Energy, Resources & Compliance Division
Planning and Assessment Group
4 Parramatta Square
12 Darcy St
PARRAMATTA NSW 2150

By email Mandana.mazaheri@planning.nsw.gov.au

Dear Ms Mazaheri

Thank you for the opportunity to provide comments on the Submissions Report for the Western Sydney Green Gas Project (SSD 10313) Environmental Impact Statement (EIS).

The Energy Networks Team made comment on the EIS on 6 February 2020 and continues to seek clarity over two issues raised in the earlier comment.

The Energy Networks Team will work with the proponent if this project receives planning approval. However, there are two items we are seeking clarification of in the consent documentation should the approval be granted. The two items are:

- Clarification on the timeframe for completion and decommissioning of the project. Specifically, clarity is required if there will be a fixed timeframe in terms of an operational period for the project or if the project operations period is extendable subject to the proponent's commercial position.
- Clarification on the scope and aspects of the project that will be incorporated within Jemena's Safety and Operating Plan (SAOP). Is it intended that an SAOP would only cover the scope that is impacting natural gas supply (for example the electrolyser/s, hydrogen storage pipework, valving and injection configuration into the gas network) or will an SAOP include the power generation equipment and/or a proposed filling station?

These aspects impact the amendments that will be required to be made to the SAOP for the project and will need to be revised and submitted to the Secretary of DPIE.

Should you have any questions in relation to this matter, please contact Mr Warren Woodhouse, Senior Technical Advisor (Gas Networks and Pipelines), at the Department on 02-8275 1932.



Yours sincerely

Navin Subash
Director, Energy Operations
Energy, Climate Change & Sustainability
20 May 2020



Our ref: DOC20/359724

Your ref: SSD-10313

Ms Mandana Mazaheri
Planning and Assessment Group
Department of Planning, Industry & Environment
4 Parramatta Square
Level 17, 12 Darcy Street
PARRAMATTA NSW 2150

Dear Ms Mazaheri

Subject: EES comments Response to Submissions for Western Sydney Green Gas Project - 194 - 202 Chandos Road, Horsley Park – SSD-10313

Thank you for your email of 4 May 2020 requesting comments on the Response to Submissions (RTS) for this State Significant Development (SSD).

The Environment, Energy and Science Group (EES) has reviewed the RTS and provides the following comments and recommendations.

EES previously advised in its submission on the EIS that the proponent will need to develop an evacuation plan in consultation with Council and the NSW State Emergency Service (SES). The RTS confirms that an Evacuation and Emergency Management Plan has already been implemented at the operational facility of the development site for the safety of operational personnel. The RTS notes that this plan will be updated further in consultation with Fairfield City Council and the NSW SES to accommodate the evacuation requirements from flooding events, especially under the PMF event, when the site is expected to be isolated due to potential submergence of culverts at Chandos Road.

EES concurs that the plan needs to be updated and recommends this is included as a condition of consent if the SSD is approved. Provided the development approval includes a condition to update the plan, EES has no further comments in relation to flood risk management at the development site and no further actions are required.

If you have any queries regarding this matter, please do not hesitate to contact Janne Grose, Senior Conservation Planning Officer on 02 8837 6017 or at janne.grose@environment.nsw.gov.au

Yours sincerely

25/05/20

Susan Harrison
**Senior Team Leader Planning
Greater Sydney Branch
Environment, Energy and Science**



In reply please quote: 19/08983
Your Ref: SSD - 10313

Contact: Patrick Warren on 9725 0215

20 May 2020

Mandana Mazaheri
Locked Bag 5022
Parramatta NSW 2124

Dear Ms Mazaheri

FAIRFIELD CITY COUNCIL COMMENTS ON RESPONSE TO SUBMISSIONS FOR THE WESTERN SYDNEY GREEN GAS PROJECT – ENVIRONMENTAL IMPACT STATEMENT – SSD 10313

Council officers have been requested to make comment in relation to the Response to submissions report regarding SSD 10313. Below forms comments by the relevant internal stakeholders.

1. Development Engineering

Previously requested items have not been provided or sufficiently addressed, see below:

- a. The site is affected by a low flood risk precinct as a result of mainstream flooding. In this regard, a flood risk management report shall be prepared by a qualified consultant and submitted to Council to demonstrate that the proposal fully complies with Chapter 11 of Council's Fairfield Citywide DCP 2013.
- b. A storm water plan shall be provided for assessment and be prepared by a qualified engineer in accordance with Council's Storm water Management Policy (September 2017). The plan should be submitted to Council's development engineering team for assessment. An on-site detention (OSD) storm water system shall be incorporated into the storm water design. All proposed hardstand areas shall be drained to the OSD.
- c. All parking spaces, driveways and maneuvering areas shall be designed in accordance with AS2890.1:2004 and AS2890.2:2002 and clearly illustrated on the architectural plans.
- d. It is noted a roundabout is proposed within the site to allow for maneuvering of vehicles. Swept path diagrams of the Articulated Vehicle shall be provided to demonstrate how the vehicle can enter, manoeuvre and exit from the site safely.
- e. A concept earthworks plan shall be prepared detailing proposed cut and fill on the site. Adequate cross sections and existing and proposed surface levels shall be included in the plan.

2. Traffic Engineers

The following shall be addressed prior to determination:

- a. All conditions set by Transport for NSW shall be complied with.
- b. The applicant has not provided a turning path diagram for the return journey (vehicles exiting the site, travelling on Chandos Road, Ferrers Road and The Horsley Drive). Based on swept path analysis undertaken by Council officers in accordance with the Austroads Guidelines, 19m long articulated vehicles turning left out of the site and turning right at the intersection of Chandos Road and Ferrers Road are a safety concern. Additional information shall be provided to address the concerns.
- c. Clarification is required regarding the number of construction vehicles that will be travelling to and from the site on a daily basis.
- d. A copy of the dilapidation report shall be submitted to Council's City Assets Branch for assessment.
- e. Chandos Road is currently signposted with 5-tonne load limit restrictions. There are a number of roads in the Fairfield Local Government Area that have been signposted with the load-limit restrictions. If the total weight of the vehicle and load exceeds 5 tonnes, you can only use a load limited street if the destination of the vehicle lies in or on the street and there is no alternative route by which to reach that destination. The safest route shall be undertaken when travelling to and from the site. The aim of this restriction is to:
 - i. Protect the surfaces of local roads that were not designed for heavy traffic, and'
 - ii. Prevent heavy vehicles using quiet local roads as shortcuts.
- f. Based on safety and amenity reasons (the presence of 5-tonne load limit restrictions) on Chandos Road, alternative route to and from the site shall be investigated.

3. Environmental Management

EMS has previously indicated that there is no objection to the project with the proviso that during the design phase the below matters are addressed and subsequent documentation is submitted for review and assessment by FCC EMS before construction begins.

- A. AN acoustic report is to be prepared by an appropriate acoustical consultant and submitted to Council for its assessment and approval following the design phase of the development. The report shall include but is not limited to the following information:
 - i. Predicative analysis as per the relevant statutory and regulatory noise guidelines for the proposal.

- ii. Where the predictive noise assessment indicate that the relevant assessment criteria are exceeded, recommendations shall be provided in relation to how noise emissions can be satisfactorily reduced to comply with the assessment criteria.
- iii. The subject site is within the flight path of Western Sydney Airport; therefore, a section on addressing aircraft noise will be required.

Jemena has indicated in its response provided in section 2.4.2 of the RTS that they will prepare and submit an acoustic report to FCC prior to operation that will comply with the NPfl. FCC supports this approach.

B. Pollution Incident Response Management Plan (PIRMP) - Prior to the construction of the facility, a Pollution Incident Response Management Plan (PIRMP) shall be submitted to Council for review and assessment.

C. Effluent Management Plan - prior to the construction of the facility, an Effluent Management Plan shall be submitted to Council for review and assessment. The effluent management plan must include the “reject water” from the all processes.

D. Pollution Incident Response Management Plans (PIRMP) - Section 2.3.1 Waste Management Plans of the RTS states that the preparation of a PIRMP is only required for holders of an Environment Protection License or licensees in accordance with section 153A of the POEO Act. Given the WSGG Project facility and operations do not satisfy this requirement, the preparation of a PIRMP is not required.

However, Under Section 153B of the POEO Act the EPA can direct any industry to have a PIRMP if Council is the ARA for the site. A PIRMP is required even if the site is not operating under an EPL. The reasoning being for safety and environmental aspects as the nature of the activity and its proximity to residents poses a manageable risk via a PIRMP. If council is not the ARA for the site then it would be prudent for the NSW EPA to request a PIRMP for the site.

E. Resource Recovery Exemption - Jemena intends to utilize a Resource Recovery Exemption and Order to apply waste to land in accordance with the POEO Act. The authority will therefore be the EPA.

It is noted that in some cases, the EPA may give exemptions for the re-use of waste that is applied to land (as defined in Clause 92 of the Protection of the Environment Operations (Waste) Regulation 2014 (POEO (Waste) Regulation), such as the proposed wastewater from the P2P Plant to be used for irrigation.

Jemena intends to apply for and utilize a Resource Recovery Exemption and Order to apply waste to land under Clause 93 of the POEO (Waste) Regulation. The authority will therefore be the EPA and the preparation of an Effluent Management Plan is therefore, not required. With regard to the effluent management plan, EMS accepts the response that the EPA will be the ARA.



Yours sincerely

Patrick Warren
Senior Strategic Land Use Planner



15 May 2020

TfNSW Reference: SYD19/00528/02

DPIE Reference: SSD 10313

Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Attention: **Mandana Mazaheri**

WESTERN SYDNEY GRREN GAS PROJECT – 194-202 CHANDOS ROAD, HORSLEY PARK

Dear Sir/Madam,

Reference is made to your correspondence dated 4 May 2020, regarding the abovementioned Application which was referred to Transport for NSW (TfNSW) for comment in accordance with *Environmental Planning and Assessment Act 1979*.

TfNSW has reviewed the Response to Submissions and notes that the construction vehicle route has been amended to address the previous road safety concerns. TfNSW does not raise any objections to this application subject to the following conditions being incorporated in the consent:

1. A Construction Pedestrian Traffic Management Plan (CPTMP) detailing construction vehicle routes, number of trucks, hours of operation, access arrangements and traffic control should be submitted to the consent authority for approval prior to the issue of a Construction Certificate.
2. The swept path of the longest vehicle entering and exiting the subject site, as well as manoeuvrability through the site, shall be in accordance with AUSTROADS. In this regard, a plan shall be submitted to the consent authority for approval, which shows that the proposed development complies with this requirement.

If you have any further questions please direct attention to Malgy Coman on 8849 2413 or email development.sydney@rms.nsw.gov.au. I hope this has been of assistance.

Yours sincerely,



Pahee Rathan
Senior Land Use Assessment Coordinator

Mandana Mazaheri

From: Leah Himona on behalf of Suellen Fitzgerald
Sent: Friday, 22 May 2020 4:55 PM
To: Mandana Mazaheri
Subject: Western Sydney Green Gas Project (SSD 10313) - Submissions Report

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mandana

Thank you for the opportunity to provide a response on the Submissions Report re: SSD 10313, the Western Sydney Green Gas Project at Horsley Park High Pressure Gas Facility located on Chandos Road, Horsley Park, lodged by Jemena Gas Networks (NSW) Ltd.

Western Sydney Parklands Trust (WSPT) notes that our submission has been recorded on page 8 under 1.4.2 under Public Authority Submissions and in Appendix A of the report.

The issues raised in our submission dated 20 February 2020 (DOC20/138362) have been addressed in the Submissions Report (*Section 2. Response to Submissions*) as follows:

- **Page 10** – WSPT request that the existing access road and proposed turning circle be upgraded to an all-weather sealed surface. **Jemena's response on page 12** . *"Jemena proposes to single or double coat spray seal the existing access road as part of the WSGG Project. This will limit the potential for air quality or dust impacts as a result of vehicle use."*
- **Page 13** – WSPT noted the proposed public walking tracks intended to be directly north, east and south of the property, as outlined in the Horsley Park Urban Farming Masterplan 2019. We request that appropriate preventative and mitigative safeguards to eliminate any potential offsite effects will be conditioned as part of the approval. **Jemena's response on page 17 (plans on Fig 1, page 17 and Fig. 2 page 19)** . *"Jemena will commit to an additional hazard assessment to reassess the risk to the secondary parklands track if the HRS is determined to be viable and proceeds. The additional hazard assessment would include considerations of additional mitigation measures if required."*
- **Page 27** – WSPT noted support of the purification of surplus water, and for this water to be considered for irrigation purposes for adjacent urban farming lots owned by the Trust and tenanted by farmers and welcome the opportunity to discuss this opportunity with the assessment team and Jemena. **Jemena's response on page 28** *"The proposed use of onsite irrigation forms part of Jemena's contingency planning and relevant approvals shall be sought, should the availability of the disposal route become unavailable. As part of the detailed design, the use of additional (if required) onsite treatment and the re-use of the water by WSPT is being considered further with meetings held between all interested parties."*

WSPT are currently working collaboratively with Jemena on temporary land access, temporary fencing works and agreed schedule of re-instatement / make-good works at completion.

Prior to commencement of any works a Terms of Agreement and Deed between Jemena and WSPT is in progress by our Property Team.

We thank you again for notifying us of the request for advice.

Kind Regards

Suellen Fitzgerald | Executive Director

Parramatta Park & Western Sydney Parklands Trusts
P: 02 9895 7947 | M: 0422 009 220
M: PO Box 3064 Parramatta NSW 2124
W: www.parrapark.com.au | www.westernsydneparklands.com.au
Facebook: [/parrapark](https://www.facebook.com/parrapark) | [/westernsydnepark](https://www.facebook.com/westernsydnepark)
Twitter: [@parrapark](https://twitter.com/parrapark) | [@westernsydnepark](https://twitter.com/westernsydnepark)

Please note, I am currently working from home Monday to Friday. You can reach me on the above phone numbers.

We acknowledge and respect the Traditional Owners and Custodians of the Lands on which we work.

