From:	Brendan.M Hurley
To:	David Koppers
Cc:	Fire Safety
Subject:	Central Sydney Industrial Estate and Downer Sustainable Road Products Complex (SSD-10459). BFS20/1400
Date:	Friday, 8 May 2020 10:49:17 AM
Attachments:	image015.png image016.png image017.png image018.png image019.png image020.png image021.png

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

Dear David,

Fire & Rescue NSW (FRNSW) acknowledge the receipt of your email on the 5th May 2020, requesting input into the preparation of the Secretary's Environmental Assessment Requirements (SEARs) for the preparation of an Environmental Impact Statement (EIS) for the Central Sydney Industrial Estate and Downer Sustainable Road Products Complex.

FRNSW have reviewed the documentation that was provided in support of the development and will not be providing comment at this time as there is currently insufficient information available regarding the fire safety and emergency response management aspects of the project.

We request that we be given the opportunity to review and provide comment once approvals have been granted and the project has progressed such that there is more relevant detailed information available.

As additional details become available Fire & Rescue NSW requests to be consulted with respect to the proposed fire and life safety systems and their configuration at the project's preliminary and final design phases.

While there is currently no requirement for a fire safety study, FRNSW may request one be undertaken at a later stage should information be provided such it is deemed that the development poses unique challenges to the response to and management of an incident.

For further information please contact the Fire Safety Infrastructure Liaison Unit, referencing FRNSW file number BFS20/1400. Please ensure that all correspondence in relation to this matter is submitted electronically to firesafety@fire.nsw.gov.au.

Regards
Brendan

A/INSPECTOR BRENDAN HURLEY
TEAM LEADER INFRASTRUCTURE LIAISON
FIRE SAFETY | Fire and Rescue NSW
E: brendan.m.hurley@fire.nsw.gov.au
M: 0438601582
1 Amarina Ave, Greenacre, NSW 2190

CITY OF PARRAMATTA

Planning Services
Department of Planning and Environment
GPO Box 39 Sydney NSW 2001
Attention: David Koppers

Our Ref	NCA/3/2020
Contact	Kate Lafferty
Telephone	9806 5393
Email	klafferty@cityofparramatta.nsw.gov.au

19 May 2020

Dear Mr Koppers,

SSD-10459 – Viva Site – 9 Devon Street – Rosehill
Central Sydney Industrial Estate and Downer Sustainable Road Products Complex
Comment on draft SEARS

Thank you for the opportunity to provide comment on the above mentioned SEARS for the proposed subdivision and Phase 1 development. Council officers have reviewed the document and wish to make the following comments, which should be incorporated within the SEARS and future EIS.

I note that no draft SEARS were provided with this request for advice.

URBAN DESIGN & PUBLIC DOMAIN

Broader Precinct Planning – Structure Plan

Council would like to advise that in order to ensure appropriate urban design and public domain outcomes for this precinct, a **structure plan** for the entire precinct should be prepared before the redevelopment of sites within the Camellia peninsula. This would ensure appropriate connectivity throughout the area by maximising:

- access along Duck River
- connections to Duck River and potentially across Duck River
- connections through and around the site so that in the long term the site does not 'block' access to:
  - The confluence of the Duck and Parramatta Rivers in the east
  - Camellia Town Centre and school in the north.

It is noted that the precinct structure plan is outside the boundaries of the proposed development however it is essential to have an understanding of the connectivity of the entire precinct and the implications for the re-development of this site.

Site Planning

In order to assist in achieving connectivity within the precinct, the following matters should be addressed within the EIS:

- The provision of a 40m riparian corridor along Duck River
- The provision of the Durham Street extension southbound to Duck River
- Consideration of the proposed lot configuration to the west with regard to the potential extension of Colquhoun Street southbound to Duck River (as indicated in the figure below).

FORESHORE ACCESS

Public foreshore access should be provided along the boundary length of Duck River. It is noted that a 40m vegetated riparian zone is required to be provided in accordance with the NSW Department of Industry *Guidelines for controlled activities on waterfront land - Riparian Corridors* (2018).

It is Council's intention to be able to establish a pedestrian and cyclist path along the foreshore that is connected back into the street network of Camellia, which will greatly enhance the quality of the environment for employees and other users, and has been

successful in other industrial park locations such as Rydalmere, Melrose Park and Woolooware Bay. However, the type of the cycling network will be dependent on the topography and context, this could be a boardwalk, a shared path or separate paths, and they often provide a useful border between natural vegetation and more manicured grass.

The subdivision application should address this matter and provide for continuous public access with a public access easement along the foreshore.

PUBLIC BENEFITS

The application should clearly demonstrate all public benefits as a result of the proposed redevelopment of the land. This will include the matters raised above in regard to the foreshore access and provision of new connecting roads.

HEIGHT NON-COMPLIANCE

Conversations with the applicant reveal that structures on this site may reach a height of 42m, which is a substantial non-compliance with the Parramatta LEP 2011 height restriction of 12m on this site.

In this regard, appropriate detailed justification will need to be provided for the proposed height non-compliance. The visual impacts will need to be appropriately documented through a comprehensive Visual Impact Analysis, considering impacts from the broader context of the surrounding area, including any potential visual impacts to the future residents of the potential Camellia Town Centre, and public domain areas, including the Parramatta and Duck Rivers.

SPECIAL PRECINCT OBJECTIVES AND CONTROLS

Section 4.3.1 of the Parramatta DCP 2011 identifies Camellia and Rydalmere as a strategic precinct. Consideration of the objectives and controls of this precinct should be included within the EIS.

NATURAL RESOURCES

It is noted that the applicant is requesting a Biodiversity Development Assessment Report (BDAR) waiver due to the high level of past disturbance and lack of vegetation within the site. It is noted that a BDAR was submitted with the previous SSD application lodged for this site (remediation) as it adjoins the Duck River riparian corridor that is included on the Biodiversity Values Map under the *Biodiversity Conservation Act 2016*.

The previous BDAR confirms that the site is largely devoid of native vegetation or other potential habitat outside the Duck River riparian corridor, which contains Mangrove Forest and Swamp Oak Floodplain Forest Endangered Ecological Community (EEC). Whilst the scoping report states that the proposed development will be located outside the riparian corridor and there will not be any direct impacts to the native vegetation, it identifies the potential for indirect impacts from runoff and that a new stormwater outlet may be required. Any proposed stormwater infrastructure (including pipes and an outlet into Duck River) would likely be located on land included on the biodiversity values map and may trigger the need for a BDAR.

Notwithstanding this, as the proposed works have the potential to indirectly impact the Duck River riparian corridor (and associated native vegetation including EEC), the following are recommended for inclusion in the SEARs:

i. Prepare a Flora and Fauna Assessment report that addresses the following (but not limited to):
    - Assessment of direct (e.g. riparian vegetation removal for stormwater infrastructure), indirect (e.g. noise, dust, light spill, sedimentation, erosion, runoff) and prescribed (e.g. water quality, water bodies and hydrological processes) impacts as per the Biodiversity Conservation Regulation 2017
    - Tests of Significance for any threatened species, ecological communities or their habitats as per Part 7 of the Biodiversity Conservation Act 2016
    - Determination of whether potential stormwater infrastructure within the Duck River riparian corridor triggers the Biodiversity Offsets Scheme

ii. Prepare a Vegetation Management Plan (VMP) to guide the establishment of a 40m wide vegetated riparian zone along Duck River consistent with the NSW Department of Industry *Guidelines for controlled activities on waterfront land - Riparian Corridors* (2018). The VMP is to provide for a complete vegetation stratum (trees/shrubs/groundcovers) utilising species from locally endemic vegetation communities.

STORMWATER AND FLOODING

Assessment and Design Principles to be demonstrated in the EIS and the Proposal

1. No significant adverse impacts on adjoining land, the locality and the environment (including Duck Creek and the riparian zone) caused by the development in all floods up to the Probable Maximum Flood from both riparian flooding and overland flow and including an allowance for climate change.

2. No significant adverse cumulative impacts on adjoining land, the locality and the environment from similar development in the locality.

3. No significant adverse impacts on adjoining land, the locality and the environment (including Duck Creek and the riparian zone) caused by the developments as a result of the lower range of more frequent stormwater flows that are likely to transport pollution, sediments and cause other negative environmental consequences.

Means of achieving the above Design Principles

This list is not exclusive but is likely to include:

a) Filling in the floodplain that causes unacceptable displacement of floodwaters and loss of storage or conveyance capacity is not acceptable and alternative forms of construction may be required such as elevated floor slabs supported on piers above ground level flood and flow paths.

b) Flood conveyance from overland and riparian flooding though the site must be safely provided for without creating 'high hazard' conditions that put site occupants and neighbours at risk. This may require wider shallower flow paths. Underground drainage must not be relied on to resolve this.

c) A substantial proportion of the site must be set aside for the management of surface water for low flows under WSUD principles and of high flood flows under safe flood management principles. Note low and high flow paths need not be the same.

d) Any proposal for a building that 'blocks out' the storage or conveyance of floodwaters up to the PMF must be supported by an assessment demonstrating how this displacement of floodwaters will be mitigated so that there are no significant impacts.

e) Management and treatment of stormwater runoff is required to be fully integrated into the landscape design using WSUD approaches. Add on 'end of pipe' proprietary water treatment devices are not supported.

f) Rainwater capture is supported and should be maximised.

g) Given the proximity of Duck River, On Site Detention is unlikely to be necessary, however justification to omit it must be provided.

h) WSUD principles include maximising pervious areas and deep soil, use of bioretention, swales, raingardens and constructed wetlands to achieve multiple hydrological, environmental and ecological objectives .

i) Buildings containing 'habitable rooms' (as defined by the Floodplain Development Manual), including storage of *valuable* items, must set the finished floor levels above the flood planning level which is the 1% AEP flood level plus 0.5m freeboard. The 1% AEP flood level is the higher of the 1% AEP riparian flood level and the 1% overland flow flood level. Riparian Flood Levels for Duck River must be obtained from Council through a Flood Information Enquiry. A flood study is likely to be required to determine overland flow flooding.

j) Buildings, including storage under roofs but without walls, such as warehouses and other facilities for the storage of non-valuable items (not including offices) may be designed to be inundated in all floods provided this does not result in escape of pollutants and contaminants into the environment and Duck River.

k) A substantial riparian buffer zone along the full site frontage to Duck River is required to enable the river bank to be rehabilitated and ecological damage to be repaired. Any stormwater infrastructure in this zone must address this and not impact it negatively, either immediately, or in the long term.

l) The riparian buffer zone or the development sites themselves must incorporate a constructed wetland(s) in accordance with WSUD approaches and to achieve effective water treatment prior to discharge into Duck River and protection against spills etc. The constructed wetland(s) will form part of a water treatment train. This must be designed to manage and treat the lower more frequent stormflows. It is not required to manage the higher flooding flows of stormwater and overland flow.

m) Access to the foreshore of Duck River is supported and should be designed to provide a buffer between the site and more ecologically sensitive areas adjacent to the river. Also giving the public access will assist in improving community appreciation of this area and from that a greater public willingness to safeguard it.

Flood and Water Management Strategy

A Flood and Water Management Strategy must be prepared to address all of this for the entire site so that all of the future developments may be accommodated within the overarching strategy.

ENVIRONMENTAL MATTERS

All required documentation addressing potential impacts of the proposal are to be submitted – including but not limited to, contamination (validation and site audit statements if remediated), impacts on any contaminated capping on the site, protection

of waterways, air pollution, noise and vibration, dust management, erosion and sedimentation control, CEMP, OEMP and waste management.

SUSTAINABLE DEVELOPMENT

A sustainability report (including water efficiency) should be provided.

Energy efficient design should address the following objectives:

- To promote sustainable development which uses energy efficiently and minimises non-renewable energy usage in the construction and use of buildings.
- To ensure that development contributes positively to an overall reduction in energy consumption and greenhouse gas emissions.

Water efficiency should address the following objectives:

- To reduce consumption of potable water.
- To harvest rainwater and urban stormwater turnoff for use.
- To reduce waste water discharge.
- To capture, treat and reuse wastewater where appropriate.

TRAFFIC

A traffic impact assessment report addressing parking requirements and traffic generation (with traffic routes identified) and an appropriate assessment of the impacts on the local road network is to be submitted.

CULTURAL PLAN

Parramatta is committed to strengthening the city as an urban place by reinvigorating its identity through means that encourage reinterpretation of history and reflect contemporary culture.

Given the history of the former Shell site, a Cultural Plan should be provided. Arts and Cultural Plans are to be prepared having regard to links between the development site and any particular social or cultural sub-groups in the community, the settlement and indigenous history of Parramatta, or other culturally significant elements. Development on such land should be designed in a manner that considers and reflects those links. Historical and cultural elements, including buildings and archaeological features are to be interpreted and integrated with any artworks on site.

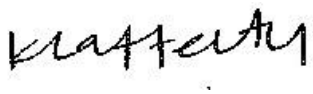
DEVELOPER CONTRIBUTIONS

The application will require the payment of developer contributions in accordance with the City of Parramatta S94A Development Contributions Plan (Amendment No. 5). A cost of development works calculated in accordance with Clause 25J of the EPA Regulation 2000 should be prepared by a suitably qualified quantity surveyor.

Council appreciates the opportunity to comment on the above application and looks forward to further consultation on this matter.

Should you wish to discuss the above matters, please contact me direct on 9806 5393 or at klafferty@cityofparramatta.nsw.gov.au

Yours sincerely



Kate Lafferty
Executive Planner
City Significant Development

Department of Primary Industries

Our Ref: SSD-10459 14 May 2020

Proposal: **Central Sydney Industrial Estate and Downer Sustainable Road Products Complex**
Property: **9 Devon Street, Rosehill NSW 2142 (Lot 100, DP1168951) – Duck River**

Thank you for your referral seeking advice on SEAR's for the above project from DPI Fisheries, a division of NSW Department of Primary Industries.

DPI Fisheries is responsible for ensuring that fish stocks are conserved and that there is no net loss of key fish habitats upon which they depend. To achieve this, DPI Fisheries ensures that developments comply with the requirements of the *Fisheries Management Act 1994* (FM Act) (namely the aquatic habitat protection and threatened species conservation provisions in Parts 7 and 7A of the Act, respectively), and the associated *Policy and Guidelines for Fish Habitat Conservation and Management (2013)*. DPI Fisheries is also responsible for ensuring the sustainable management of commercial, recreational and Aboriginal cultural fishing, aquaculture, marine parks and aquatic reserves within NSW.

DPI Fisheries has reviewed the proposal in light of these provisions makes the following comments:

- It is noted that the contamination remediation has yet to be determined (WARP).
- Development consent will need to be sought in relation to Acid Sulphate Soil (ASS) risk. This will include an ASS Management Plan.
- The riparian vegetation to the south of the area contains important mangrove ecosystems. It is afforded protection under the FM Act, Biodiversity Conservation Act and the EPBC Act. It is also mapped as *Coastal Wetlands* under the Coastal Management SEPP, while this is acknowledged on p.31 of the Scoping Report, your appreciation of the importance of this ecologically sensitive area needs to be reflected in the forthcoming EIS.
- The same area is also mapped as Type 1, Class 1 Key Fish Habitat (KFH). As such, our Policy and Guidelines recommend a 100m riparian buffer. This is significantly more than is currently proposed (30m). Reducing this buffer must be justified and shown how it will not impact on the waterway.
- The activities proposed for the sight would require a storm water retention system that would ensure that no contamination from onsite activities reached natural waterways.
- DPI Fisheries requires the ecological study to assess how the storm/surface water may affect the EEC riparian vegetation and aquatic ecosystem it interfaces.

If you require any further information, please contact Josi Hollywood on (02) 4222 8311.

Yours sincerely,

Scott Carter
Senior Fisheries Manager, Coastal Systems

DPI Fisheries
Mail to: R. Philps,1243 Bruxner Hwy, Wollongbar NSW 2477
Email: ahp.central@dpi.nsw.gov.au
ABN 20770707468

Mr David Koppers
Senior Environmental Assessment Officer
Industry Assessments, DPIE
Locked Bag 5022
Parramatta NSW 2150

Notice Number 1594960

Date 21-May-2020

RE: Proposed Central Sydney Industrial Estate – SSD-10459 – 9 Devon Street, Rosehill

I refer to your request for the Environment Protection Authority's (**EPA**) requirements for the environmental assessment (**EA**) in regard to the above proposal received by EPA on 5 May 2020.

The EPA understands the proposal is seeking approval for subdivision and infrastructure works to a 35 hectare area of 9 Devon Street, Rosehill, NSW, 2142, to create an industrial estate of 6 lots being Central Sydney Industrial Estate, and for the development and operation of Downer's Sustainable Road Products Complex in one of the lots which would be the first stage of the creation of the industrial estate.

The EPA has considered the details of the proposal as provided within the scoping report prepared by Element Environmental on behalf of VE Property and dated 24 April 2020. The EPA has identified the information it requires to issue its general terms of approval in Attachment A & B. In summary, the EPA's key information requirements for the proposal include an adequate assessment of:

1. Waste management;

2. Water management;

3. Air quality;

4. Noise;

5. Soils and contamination.

In carrying out the assessment, the proponent should refer to the relevant guidelines as listed in Attachment C and any relevant industry codes of practice and best practice management guidelines.

The proponent should be made aware that any commitments made in the EA may be formalised as approval conditions and may also be placed as formal licence conditions.

The proponent should be made aware that, consistent with provisions under Part 9.4 of the *Protection of the Environment Operations Act 1997* (**the Act**) the EPA may require the provision of a financial assurance and/or assurances. The amount and form of the assurance(s) would be determined by the EPA and required as a condition of an Environment Protection Licence (**EPL**).

In addition, as a requirement of an EPL, the EPA will require the proponent to prepare, test and implement a Pollution Incident Response Management Plan and/or Plans in accordance with Section 153A of the Act.

Please note that the EPA has not considered Aboriginal cultural heritage, biodiversity or built form/urban design requirements as these are the purview of the Environment, Energy and Science Group (**EES**) within the Department of Planning, Industry and Environment.

Yours sincerely

Celeste Forestal

Unit Head

Regulatory Operations Metro North

(by Delegation)

Attachment A – Site specific requirements for Stage 1 of the proposal – Downer Sustainable Road Products Complex

Stage 1 of the proposal is for the construction and operation of the Downer Sustainable Road Products Complex at part of 9 Devon Street, Rosehill (**the Premises**). This involves the construction and operation of four facilities which are an asphalt plant, a bitumen plant, and two waste facilities. The site-specific requirements for the proposal are set out below:

1. The facilities must be enclosed – The EPA requires that all waste and materials are stored and processed inside an enclosed building. All waste and material handling activities, including receival, sorting, processing, sampling, quarantine, storage and loading must be conducted within an enclosed building.

No waste or materials, including finished products, may be stored outside. Any external haulage areas or roads must be sealed hardstand. Any unused external surfaces must be sealed hardstand or vegetated.

2. Site plan – A detailed site plan of the Premises should be included in the environmental impact statement (**EIS**). The site plan should identify, but not be limited to:

- locations of the proposed facilities;
- traffic flows and directions;
- haulage;
- materials and waste receival, processing, storage, and loading (for each waste and material type);
- quarantine;
- infrastructure for environmental controls including dust, noise, water, odour, and wheel wash;
- weighbridges;
- site boundaries;
- stormwater drainage areas;
- unused stabilised areas.

3. Relationship between facilities – The EIS should detail and explain any interrelationship between the proposed facilities and how these facilities will interact with each other and be managed in concert with one another at the Premises.

4. Waste and material management – The EIS must include a detailed assessment of the waste and material management processes to be undertaken at the Premises. This includes but is not limited to:

- details of the sources of waste/materials to be received at the Premises;
- details of the types and quantities of each type of waste/materials to be received at the Premises;
- details of the maximum volume of each waste/material to be stored on the Premises at any one time;
- details of the maximum annual throughput of each waste/material to be processed at the Premises;
- a detailed description of processing procedures for each waste and material type;
- a description of how the proponent will meet the EPA's record keeping and reporting requirements, including weighing material in and out of the Premises (refer to the EPA's Waste Levy Guidelines for more information – available at:

  https://www.epa.nsw.gov.au/your-environment/waste/waste-levy);
- details of the type and quantities of materials to be produced and their intended fate;
- the intended fates of all other waste and materials received/produced on site which are not suitable for re-use;
- details of any materials produced under a Resource Recovery Order, and the controls/procedures in place for meeting the conditions of that order;
- a description of procedures for dealing with non-conforming waste and materials (i.e. waste not permitted to be received at the Premises).

5. Waste and material types – The EPA required detailed information on the waste and material types proposed to be received at the Premises. For each waste/material type, the proponent must detail the physical and chemical content of the waste/material, the types of pollution which may result from the storage and processing of that waste/material and mitigation measures for managing any such impacts.

The type of waste collected from street sweepings, stormwater gullies, and mud from non-destructive excavation can be highly variable depending on its catchment area (residential, rural, industrial etc) and can be difficult to characterise. It could contain heavy metals, rubber, oil and other toxic chemicals and syringes (classified as Clinical Waste). The proponent will need to provide information on the source and type of pollutant to be collected and details the types of catchments where the gross pollutant traps are located as pollutants found in residential areas would differ to those found in industrial areas. Consideration needs to be given to the potential change in pollutant source and type of pollutant which may occur as a catchment develops or is redeveloped.

The EIS must identify the types of waste that will be received at the waste facilities, with reference to the *EPA's Waste Classification Guidelines* (**the Guidelines**) and definitions in the *Protection of the Environment Operations Act 1997* (**the Act**). For example:

- The Guidelines includes "grit, sediment, litter and gross pollutants collected in, and removed from, stormwater treatment devices and/or stormwater management systems" – and requires that this waste type "has been dewatered so that they do not contain free liquids".

- Where waste is being received at the Premises wet and will require dewatering – the EIS must demonstrate whether it is classified as liquid waste, or not.

6. Water management – It is considered best practice by the EPA for facilities to retain all water on site and not discharge any water in order to limit pollution and contamination. The EPA requires a proponent first demonstrate that all practical and reasonable alternatives to discharge have been considered and implemented before other options are reviewed. Where discharge of polluted water is unavoidable, the proponent must:

- identify all pollutants that pose a risk of non-trivial harm and the potential impact of those pollutants on the environment;
- implement all practical measures that can be taken to prevent, control, abate or mitigate the pollution and protect the environment from harm;
- consider the environmental values of water affected by the proposed discharge; and implement all practical measures that can be taken to restore or maintain those values.

The EPA expects that assessment of impacts to water be included in the EIS. This must include at a minimum characterisation of any proposed discharges from the Premises (both volume and quantity), assessment of the potential impacts from these discharges and proposed mitigation measures to manage any impacts. Discharges includes, but is not limited to stormwater (contaminated and uncontaminated), and wastewater (such as from dewatering). Details should be provided of any trade waste agreements in place with Sydney Water. Please refer to Attachment B for further detail of what is to be included in assessment of water impacts.

Details of stormwater management during both construction and operation must be included in the EIS. The scoping report refers to 'Managing Urban Stormwater: Soils and construction'. Please note that while this reference may be appropriate during construction works it is not appropriate for the operation of facilities.

The EPA would expect that all material handling and waste management buildings be constructed to exclude all stormwater and that internal surfaces be graded inwards to contain any contaminated water (being any water that has come into contact with waste or other materials which have the potential to cause contamination). The EPA notes that even where all waste and material storage and processing is conducted within an enclosed building, materials may be tracked on to external surfaces leading to the generation of contaminated water. Any external areas where vehicles travel or wait for loading/unloading must drain to a stormwater quality treatment device sufficient to remove any contaminants, both solid and dissolved, prior to discharge offsite.

7. Air Quality – The EIS should include an air quality impact assessment (**AQIA**) in accordance with the Approved Methods for the Modelling and Assessment of Air Pollutants in NSW, including as a minimum the following components:

- assessment objective:
    - demonstrate the proposed project will incorporate and apply best management practice emission controls;

- demonstrate that the project will not cause violation of the project adopted air quality impact assessment criteria at any residential dwelling or other sensitive receptor.

- assessment criteria:
  - define applicable assessment criteria for the proposed development referencing the Approved Methods for the Modelling and Assessment of Air Pollutants in NSW, including appendices and updates;
  - demonstrate the proposal's ability to comply with the relevant regulatory framework, specifically the *Protection of the Environment Operations 1997* (**the Act**) and the *Protection of the Environment (Clean Air) Regulation 2010*.
- existing environment:
  - provide a detailed description of the existing environment within the assessment domain, including:
    - geophysical form and land-uses;
    - location of all sensitive receptors;
    - existing air quality; and local and regional prevailing meteorology
  - justify all data used in the assessment, specifically including analysis of inter-annual trends (preferably five consecutive years of data), availability of monitoring data, and local topographical features;
  - meteorological modelling must be verified against monitored data (verification should involve comparative analysis of wind speed, wind direction and temperature, at a minimum);
  - a review of all existing, recently approved and planned developments likely to contribute to cumulative air quality impacts must be completed.
- emissions inventory:
  - provide a detailed description of the project and identify the key stages with regards to the potential for air emissions and impacts on the surrounding environment;
  - identify all sources of air emissions, including mechanically generated, combustion and transport related emissions and odours likely to be associated with the proposed development;
  - estimate emissions of TSP, PM10, PM2.5, (tonnes per year), at a minimum, for all identified sources during each key development stage. The emissions inventory should:
    - utilise USEPA (1995) (and updates) emission estimation techniques, direct measurement or other method approved in writing by the EPA;
    - calculate uncontrolled emissions (with no particulate matter controls in place);
    - calculate controlled emissions (with proposed particulate matter controls in place).
  - for potentially odorous emissions provide the emission rates in terms of odour units (determined by techniques compatible with EPA procedures). Use sampling and analysis techniques for

individual or complex odours and for point or diffuse sources, as appropriate. Note: with dust and odour, it may be possible to use data from existing similar activities to generate emission rates;

- the emissions inventory must be explicitly coupled with the project description;
- provide a detailed summary and justification of all parameters adopted within all emission estimation calculations, including site specific measurements, proponent recommended values or published literature;
- document, including quantification and justification, all air quality emission control techniques/practices proposed for implementation during the project (as a minimum, consideration must be given to source control techniques, and reactive/predictive management techniques).

- best practice determination:
  - demonstrate that the proposed control techniques/practices are consistent with best management practice.
- dispersion modelling and interpretation of results:
  - atmospheric dispersion modelling should be undertaken in accordance with the Approved Methods for the Modelling and Assessment of Air Pollutants in NSW, including appendices and updates;
  - modelling must implement fit for purpose modelling techniques that:
    - have regard for the most up to date and scientifically accepted dispersion modelling techniques;
    - contextualise all assumptions based on current scientific understanding and available data;
    - include a thorough validation of adopted methods and model performance.
  - use an appropriate atmospheric dispersion model to predict, at a minimum, incremental ground level concentrations/levels of the following:
    - 24-hour and annual average PM10 concentrations;
    - 24-hour and annual average PM2.5 concentrations.
  - ground level concentrations of pollutants should be presented for surrounding privately-owned properties, mine-owned properties and other sensitive receptors (as applicable);
  - undertake a cumulative assessment of predicted impacts (the contribution of all identified existing and recently approved developments should be accounted for in the cumulative assessment);
  - cumulative 24-hour PM10 and PM2.5 concentrations must be assessed in accordance with the Approved Methods for the Modelling and Assessment of Air Pollutants in NSW, including appendices and updates, and/or a suitably justified probabilistic methodology;
  - cumulative annual average PM10 and PM2.5 should be assessed using a sufficiently justified background concentration(s);

- results of dispersion modelling should be presented as follows:
    - isopleth plots showing the geographic extent of maximum pollutant concentrations (incremental and cumulative);
    - tables presenting the maximum predicted pollutant concentrations (increment and cumulative) and the frequency of any predicted exceedances at each surrounding privately-owned properties, mine-owned properties and other sensitive receptors (as applicable);
    - time series and frequency distribution plots of pollutant concentrations at each private receptor location at which an exceedance is predicted to occur (where no exceedances are predicted, the analysis must be performed for the most impacted off-site sensitive receptor).

- air quality emission control measures:
    - provide a detailed discussion of all proposed air quality emission control measures, including details of a reactive/predictive management system. The information provide must include:
        - explicit linkage of proposed emission controls to the site-specific best practice determination assessment;
        - timeframe for implementation of all identified emission controls;
        - key performance indicators for emission controls;
        - monitoring methods (location, frequency, duration);
        - response mechanisms;
        - responsibilities for demonstrating and reporting achievement of KPIs;
        - record keeping and complaints response register;
        - compliance reporting.

Please note, that in relation to air impacts, all sensitive receivers need to be considered when conducting air quality and odour impact assessments. This includes the nearby racecourse and function centre, and the development of apartments occurring on the south of Parramatta River in Camellia. A sensitive receiver can also include a place where someone works. Therefore, any industrial neighbours to the Premises must be included as sensitive receivers.

8. Noise – The proponent must assess noise impacts and demonstrate effective controls to manage noise impacts, including from increased traffic, at all receptors. Please refer to Attachment B for further detail of what is to be included in the noise impact assessment.

9. Soils and contamination – The EPA understands the Premises was previously part of an oil refinery. The EPA understands that as a result of the previous land use, the Premises is likely to be contaminated and require remediation. The EIS must address the following:

- the proponent must assess whether the land is contaminated and determine the nature and extent of any soil and groundwater contamination;
- the proponent must identify if remediation of the land is required, having regard to the ecological and human health risks posed by the contamination in the context of existing and proposed land uses;
- the proponent must ensure any site investigations undertaken, and the subsequent report/s, are prepared in accordance with relevant guidelines made or approved by the EPA under section 105 of the *Contaminated Land Management Act 1997*;
- the proponent must follow the processes outlined in State Environmental Planning Policy 55 - Remediation of Land (SEPP55), to assess the suitability of the land and any remediation required in relation to the proposed use;
- the proponent must ensure that a NSW EPA accredited Site Auditor is involved throughout the duration of works to ensure that any work required in relation to soil and groundwater contamination complies with current regulations and guidelines and meets the appropriate standards.

When assessing the impacts relating to soil and contamination, the EIS should make reference to:

- *Managing Land Contamination: Planning Guidelines SEPP 55 –Remediation of Land* (DUAP & EPA, 1998);
- *Contaminated Land Guidelines: Consultants Reporting on Contaminated Sites* (EPA, 2020);
- *Guidelines on the Duty to Report Contamination under the Contaminated Land Management Act 1997* (EPA, 2015);
- any other guidelines made or approved under section 105 of the *Contaminated Land Management Act 1997*.

10. Occupier of the premises – The EPA understands that VE Property are the current owners of the Premises and that negotiations are occurring regarding the transfer of ownership. The EPA can only issue an environment protection licence to a person who is the lawful occupier of a Premises. The EPA will require evidence that the proponent is the lawful occupier of the Premises.

11. Scheduled activities – The proposal for the Premises involves the operation of a number of different facilities. The EIS should identify all scheduled activities under Schedule 1 of the Act for which an environment protection licence will be required.

12. Dangerous goods and chemical transport, storage and handling – The EIS must outline all details regarding the transport, handling, storage and use of dangerous goods, chemicals, and products, including fuel, both on site and with ancillary activities and describe the measures proposed to minimise the potential for leakage or the migration of pollutants into the air, land or waters from the Premises. If fuel is intended on being stored at the Premises, any fuel storage areas must be undercover and bunded.

The EIS should include details of emergency management procedures, including but not limited to spills of chemicals or restricted, hazardous and/or liquid waste stored on the Premises.

13. Wheel wash – Best practice material handling facilities, particularly waste management facilities, contain a wheel wash to reduce risk of contaminants being tracked out onto public roads. The EPA notes the scoping report does not contain reference to a wheel wash for the site. The proponent should set out in the EIS whether a wheel wash will be installed and if not, justification as to why a wheel wash will not be installed and how contaminants will be retained and managed onsite without a wheel wash.

14. Standards for managing construction waste – The proponent should be aware that changes to the *Protection of the Environment Operations (Waste) Regulation* commenced on 16 November 2018, which legislates 'Standards for managing construction waste in NSW' (**the Standards**). The Standards became enforceable on 16 May 2019 and apply to all facilities receiving construction and demolition waste regardless of when approval was/is given for the facility. If the proponent intends on receiving construction and demolition waste, the EIS should demonstrate how compliance with the Standards will be achieved. The proponent should be aware of all the legislative requirements relating to the Standards. The Standards are available at:

https://www.epa.nsw.gov.au/your-environment/waste/industrial-waste/construction-demolition/construction-and-demolition-waste

15. Fire Safety Guidelines – Fire and Rescue NSW have developed guidelines regarding fire safety within waste facilities titled 'Fire safety guideline – Fire safety in waste facilities' and dated 23 October 2019 (**the Fire Safety Guidelines**). The Fire Safety Guidelines are applicable to any waste facility within NSW involved in the storage, processing or resource recovery of combustible waste material. The EIS should demonstrate how the proposal will ensure compliance with the Fire Safety Guidelines. The Fire Safety Guidelines are available at:

https://www.fire.nsw.gov.au/gallery/files/pdf/guidelines/guidelines_fire_safety_in_waste_facilities.pdf

Attachment B - General requirements for the proposal

How to use these requirements

The EPA requirements have been structured in accordance with the DIPNR EIS Guidelines, as follows. It is suggested that the EIS follow the same structure:

A. Executive summary

B. The proposal

C. The location

D. Identification and prioritisation of issues

E. The environmental issues

F. List of approvals and licences

G. Compilation of mitigation measures

H. Justification for the proposal

A Executive summary

The executive summary should include a brief discussion of the extent to which the proposal achieves identified environmental outcomes.

B The proposal

1. Objectives of the proposal

- The objectives of the proposal should be clearly stated and refer to:
  a) the size and type of the operation, the nature of the processes and the products, by-products and wastes produced
  b) a life cycle approach to the production, use or disposal of products
  c) the anticipated level of performance in meeting required environmental standards and cleaner production principles
  d) the staging and timing of the proposal and any plans for future expansion
  e) the proposal's relationship to any other industry or facility.

2. Description of the proposal

General

- Outline the production process including:
  a) the environmental "mass balance" for the process – quantify in-flow and out-flow of materials, any points of discharge to the environment and their respective destinations (sewer, stormwater, atmosphere, recycling, landfill etc)
  b) any life-cycle strategies for the products.
- Outline cleaner production actions, including:
  a) measures to minimise waste (typically through addressing source reduction)
  b) proposals for use or recycling of by-products
  c) proposed disposal methods for solid and liquid waste
  d) air management systems including all potential sources of air emissions, proposals to re-use or treat emissions, emission levels relative to relevant standards in regulations, discharge points
  e) water management system including all potential sources of water pollution, proposals for re-use, treatment etc, emission levels of any wastewater discharged, discharge points, summary of options explored to avoid a discharge, reduce its frequency or reduce its impacts, and rationale for selection of option to discharge.
  f) soil contamination treatment and prevention systems.
- Outline construction works including:
  a) actions to address any existing soil contamination
  b) any earthworks or site clearing; re-use and disposal of cleared material (including use of spoil on-site)
  c) construction timetable and staging; hours of construction; proposed construction methods

d) environment protection measures, including noise mitigation measures, dust control measures and erosion and sediment control measures.

- Include a site diagram showing the site layout and location of environmental controls.

Air

- Identify all sources or potential sources of air emissions from the development.
  Note: emissions can be classed as either:
  - *point (e.g. emissions from stack or vent) or*
  - *fugitive (from wind erosion, leakages or spillages, associated with loading or unloading, conveyors, storage facilities, plant and yard operation, vehicle movements (dust from road, exhausts, loss from load), land clearing and construction works).*
- Provide details of the project that are essential for predicting and assessing air impacts including:
  a) the quantities and physio-chemical parameters (e.g. concentration, moisture content, bulk density, particle sizes etc) of materials to be used, transported, produced or stored
  b) an outline of procedures for handling, transport, production and storage
  c) the management of solid, liquid and gaseous waste streams with potential to generate emissions to air.

Noise and vibration

- Identify all noise sources or potential sources from the development (including both construction and operation phases). Detail all potentially noisy activities including ancillary activities such as transport of goods and raw materials.
- Specify the times of operation for all phases of the development and for all noise producing activities.
- For projects with a significant potential traffic noise impact provide details of road alignment (include gradients, road surface, topography, bridges, culverts etc), and land use along the proposed road and measurement locations – diagrams should be to a scale sufficient to delineate individual residential blocks.

Water

- Provide details of the project that are essential for predicting and assessing impacts to waters including:
  a) the quantity and physio-chemical properties of all potential water pollutants and the risks they pose to the environment and human health, including the risks they pose to Water Quality Objectives in the ambient waters (as defined on http://www.environment.nsw.gov.au/ieo/index.htm, using technical criteria derived from *the Australian and New Zealand Guidelines for Fresh and Marine Water Quality*, ANZECC 2000)
  b) the management of discharges with potential for water impacts
  c) drainage works and associated infrastructure; land-forming and excavations; working capacity of structures; and water resource requirements of the proposal.

- Outline site layout, demonstrating efforts to avoid proximity to water resources (especially for activities with significant potential impacts e.g. effluent ponds) and showing potential areas of modification of contours, drainage etc.
- Outline how total water cycle considerations are to be addressed showing total water balances for the development (with the objective of minimising demands and impacts on water resources). Include water requirements (quantity, quality and source(s)) and proposed storm and wastewater disposal, including type, volumes, proposed treatment and management methods and re-use options.

Waste and chemicals

Provide details of the quantity and type of both liquid waste and non-liquid waste generated, handled, processed or disposed of at the premises. Waste must be classified according to the EPA's *Waste Classification Guidelines 2014 (as amended from time to time)*

- Provide details of liquid waste and non-liquid waste management at the facility, including:
  a) the transportation, assessment and handling of waste arriving at or generated at the site
  b) any stockpiling of wastes or recovered materials at the site
  c) any waste processing related to the facility, including reuse, recycling, reprocessing (including composting) or treatment both on- and off-site
  d) the method for disposing of all wastes or recovered materials at the facility
  e) the emissions arising from the handling, storage, processing and reprocessing of waste at the facility
  f) the proposed controls for managing the environmental impacts of these activities.
- Provide details of spoil disposal with particular attention to:
  a) the quantity of spoil material likely to be generated
  b) proposed strategies for the handling, stockpiling, reuse/recycling and disposal of spoil
  c) the need to maximise reuse of spoil material in the construction industry
  d) identification of the history of spoil material and whether there is any likelihood of contaminated material, and if so, measures for the management of any contaminated material
  e) designation of transportation routes for transport of spoil.
- Provide details of procedures for the assessment, handling, storage, transport and disposal of all hazardous and dangerous materials used, stored, processed or disposed of at the site, in addition to the requirements for liquid and non-liquid wastes.
- Provide details of the type and quantity of any chemical substances to be used or stored and describe arrangements for their safe use and storage.

- Reference should be made to the guidelines: EPA's *Waste Classification Guidelines 2014 (as amended from time to time)*

ESD

- Demonstrate that the planning process and any subsequent development incorporates objectives and mechanisms for achieving ESD, including:
  a) an assessment of a range of options available for use of the resource, including the benefits of each option to future generations

  proper valuation and pricing of environmental resources

  b) identification of who will bear the environmental costs of the proposal.

3. Rehabilitation

- Outline considerations of site maintenance, and proposed plans for the final condition of the site (ensuring its suitability for future uses).

4. Consideration of alternatives and justification for the proposal

- Consider the environmental consequences of adopting alternatives, including alternative:
  a) sites and site layouts
  b) access modes and routes
  c) materials handling and production processes
  d) waste and water management
  e) impact mitigation measures
  f) energy sources
- Selection of the preferred option should be justified in terms of:
  a) ability to satisfy the objectives of the proposal
  b) relative environmental and other costs of each alternative
  c) acceptability of environmental impacts and contribution to identified environmental objectives
  d) acceptability of any environmental risks or uncertainties
  e) reliability of proposed environmental impact mitigation measures
  f) efficient use (including maximising re-use) of land, raw materials, energy and other resources.

C The location

1. General

- Provide an overview of the affected environment to place the proposal in its local and regional environmental context including:

meteorological data (e.g. rainfall, temperature and evaporation, wind speed and direction)

g) topography (landform element, slope type, gradient and length)

h) surrounding land uses (potential synergies and conflicts)

i) geomorphology (rates of landform change and current erosion and deposition processes)

j) soil types and properties (including erodibility; engineering and structural properties; dispersibility; permeability; presence of acid sulfate soils and potential acid sulfate soils)

k) ecological information (water system habitat, vegetation, fauna)

l) availability of services and the accessibility of the site for passenger and freight transport.

2. Air

- Describe the topography and surrounding land uses. Provide details of the exact locations of dwellings, schools and hospitals. Where appropriate provide a perspective view of the study area such as the terrain file used in dispersion models.
- Describe surrounding buildings that may effect plume dispersion.
- Provide and analyse site representative data on following meteorological parameters:

a) temperature and humidity

b) rainfall, evaporation and cloud cover

c) wind speed and direction

d) atmospheric stability class

e) mixing height (the height that emissions will be ultimately mixed in the atmosphere)

f) katabatic air drainage

g) air re-circulation.

3. Noise and vibration

- Identify any noise sensitive locations likely to be affected by activities at the site, such as residential properties, schools, churches, and hospitals. Typically the location of any noise sensitive locations in relation to the site should be included on a map of the locality.
- Identify the land use zoning of the site and the immediate vicinity and the potentially affected areas.

4. Water

- Describe the catchment including proximity of the development to any waterways and provide an assessment of their sensitivity/significance from a public health, ecological and/or economic perspective. The Water Quality and River Flow Objectives on the website: http://www.environment.nsw.gov.au/ieo/index.htm should be used to identify the agreed environmental values and human uses for any affected waterways. This will help with the description of the local and regional area.

5. Soil Contamination Issues

- Provide details of site history – if earthworks are proposed, this needs to be considered with regard to possible soil contamination, for example if the site was previously a landfill site or if irrigation of effluent has occurred.

D Identification and prioritisation of issues / scoping of impact assessment

- Provide an overview of the methodology used to identify and prioritise issues. The methodology should take into account:
  a) relevant NSW government guidelines
  b) industry guidelines
  c) EISs for similar projects
  d) relevant research and reference material
  e) relevant preliminary studies or reports for the proposal
  f) consultation with stakeholders.
- Provide a summary of the outcomes of the process including:
  a) all issues identified including local, regional and global impacts (e.g. increased/ decreased greenhouse emissions)
  b) key issues which will require a full analysis (including comprehensive baseline assessment)
  c) issues not needing full analysis though they may be addressed in the mitigation strategy
  d) justification for the level of analysis proposed (the capacity of the proposal to give rise to high concentrations of pollution compared with the ambient environment or environmental outcomes is an important factor in setting the level of assessment).

E The environmental issues

1. General

- The potential impacts identified in the scoping study need to be assessed to determine their significance, particularly in terms of achieving environmental outcomes, and minimising environmental pollution.
- Identify gaps in information and data relevant to significant impacts of the proposal and any actions proposed to fill those information gaps so as to enable development of appropriate management and mitigation measures. This is in accordance with ESD requirements.

Note: The level of detail should match the level of importance of the issue in decision making which is dependent on the environmental risk.

Describe baseline conditions

- Provide a description of existing environmental conditions for any potential impacts.

Assess impacts

- For any potential impacts relevant for the assessment of the proposal provide a detailed analysis of the impacts of the proposal on the environment including the cumulative impact of the proposal on the receiving environment especially where there are sensitive receivers.
- Describe the methodology used and assumptions made in undertaking this analysis (including any modelling or monitoring undertaken) and indicate the level of confidence in the predicted outcomes and the resilience of the environment to cope with the predicted impacts.
- The analysis should also make linkages between different areas of assessment where necessary to enable a full assessment of environmental impacts e.g. assessment of impacts on air quality will often need to draw on the analysis of traffic, health, social, soil and/or ecological systems impacts; etc.
- The assessment needs to consider impacts at all phases of the project cycle including: exploration (if relevant or significant), construction, routine operation, start-up operations, upset operations and decommissioning if relevant.
- The level of assessment should be commensurate with the risk to the environment.

Describe management and mitigation measures

- Describe any mitigation measures and management options proposed to prevent, control, abate or mitigate identified environmental impacts associated with the proposal and to reduce risks to human health and prevent the degradation of the environment. This should include an assessment of the effectiveness and reliability of the measures and any residual impacts after these measures are implemented.
- Proponents are expected to implement a 'reasonable level of performance' to minimise environmental impacts. The proponent must indicate how the proposal meets reasonable levels of performance. For example, reference technology based criteria if available, or identify good practice for this type of activity or development. A 'reasonable level of performance' involves adopting and implementing technology and

management practices to achieve certain pollutant emissions levels in economically viable operations. Technology-based criteria evolve gradually over time as technologies and practices change.

- Use environmental impacts as key criteria in selecting between alternative sites, designs and technologies, and to avoid options having the highest environmental impacts.
- Outline any proposed approach (such as an Environmental Management Plan) that will demonstrate how commitments made in the EIS will be implemented. Areas that should be described include:

  a) operational procedures to manage environmental impacts

  b) monitoring procedures

  c) training programs

  d) community consultation

  e) complaint mechanisms including site contacts

  f) strategies to use monitoring information to improve performance

  g) strategies to achieve acceptable environmental impacts and to respond in event of exceedences.

4. Air

Describe baseline conditions

- Provide a description of existing air quality and meteorology, using existing information and site representative ambient monitoring data.

Assess impacts

- Identify all pollutants of concern and estimate emissions by quantity (and size for particles), source and discharge point.
- Estimate the resulting ground level concentrations of all pollutants. Where necessary (e.g. potentially significant impacts and complex terrain effects), use an appropriate dispersion model to estimate ambient pollutant concentrations. Discuss choice of model and parameters with the EPA.
- Describe the effects and significance of pollutant concentration on the environment, human health, amenity and regional ambient air quality standards or goals.
- Describe the contribution that the development will make to regional and global pollution, particularly in sensitive locations.
- For potentially odorous emissions provide the emission rates in terms of odour units (determined by techniques compatible with EPA procedures). Use sampling and analysis techniques for individual or complex odours and for point or diffuse sources, as appropriate.

  Note: With dust and odour, it may be possible to use data from existing similar activities to generate emission rates.

- Reference should be made to relevant guidelines, including *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* (DEC, 2016)*; Approved Methods for the Sampling and Analysis of Air Pollutants in NSW* (DEC, 2007)*; Assessment and Management of Odour from Stationary Sources in*

NSW (DEC, 2006)*; Technical Notes: Assessment and Management of Odour from Stationary Sources in NSW (DEC, 2006); Load Calculation Protocol for use by holders of NSW Environment Protection Licences when calculating Assessable Pollutant Loads* (DECC, 2009).

Describe management and mitigation measures

- Outline specifications of pollution control equipment (including manufacturer's performance guarantees where available) and management protocols for both point and fugitive emissions. Where possible, this should include cleaner production processes.

5. Noise and vibration

Describe baseline conditions

- Determine the existing background (LA90) and ambient (LAeq) noise levels, as relevant, in accordance with the *NSW Noise Policy for Industry*.
- Determine the existing road traffic noise levels in accordance with the *NSW Road Noise Policy*, where road traffic noise impacts may occur.
- The noise impact assessment report should provide details of all monitoring of existing ambient noise levels including:
  a) details of equipment used for the measurements
  b) a brief description of where the equipment was positioned
  c) a statement justifying the choice of monitoring site(s), including the procedure used to choose the site(s), having regards to Fact Sheets A and B of the *NSW Noise Policy for Industry.*
  d) details of the exact location of the monitoring site and a description of land uses in surrounding areas
  e) a description of the dominant and background noise sources at the site
  f) day, evening and night assessment background levels for each day of the monitoring period
  g) the final Rating Background Level (RBL) value
  h) graphs of the measured noise levels for each day should be provided
  i) a record of periods of affected data (due to adverse weather and extraneous noise), methods used to exclude invalid data and a statement indicating the need for any re-monitoring.

Assess impacts

- Determine the project noise trigger levels for the site. For each identified potentially affected receiver, this should include:
  a) determination of the project intrusive noise level for each identified potentially affected receiver
  b) selection and justification of the appropriate amenity category for each identified potentially affected receiver

c) determination of the project amenity noise level for each receiver

d) determination of the appropriate maximum noise level event assessment (sleep disturbance) trigger level.

- Maximum noise levels during night-time period (10pm-7am) should be assessed to analyse possible affects on sleep. Determine expected noise level and noise character likely to be generated from noise sources during:

  a) site establishment

  b) construction

  c) operational phases

  d) transport including traffic noise generated by the proposal

  e) other services.

  Note: The noise impact assessment report should include noise source data for each source in 1/1 or 1/3 octave band frequencies including methods for references used to determine noise source levels. Noise source levels and characteristics can be sourced from direct measurement of similar activities or from literature (if full references are provided).

- Determine the noise levels likely to be received at the reasonably most affected location(s) (these may vary for different activities at each phase of the development).
- The noise impact assessment report should include:

  a) a plan showing the assumed location of each noise source for each prediction scenario

  b) a list of the number and type of noise sources used in each prediction scenario to simulate all potential significant operating conditions on the site

  c) any assumptions made in the predictions in terms of source heights, directivity effects, shielding from topography, buildings or barriers, etc

  d) methods used to predict noise impacts including identification of any noise models used.

  e) the weather conditions considered for the noise predictions

  f) the predicted noise impacts from each noise source as well as the combined noise level for each prediction scenario

  g) for developments where a significant level of noise impact is likely to occur, noise contours for the key prediction scenarios should be derived

  h) an assessment of the need to include modification factors as detailed in Fact Sheet C of the *NSW Noise Policy for Industry*.

- Discuss the findings from the predictive modelling and, where relevant noise criteria have not been met, recommend additional feasible and reasonable mitigation measures.
- The noise impact assessment report should include details of any mitigation proposed including the attenuation that will be achieved and the revised noise impact predictions following mitigation.

  a) Where relevant noise/vibration levels cannot be met after application of all feasible and reasonable mitigation measures the residual level of noise impact needs to be quantified

- For the assessment of existing and future traffic noise, details of data for the road should be included such as assumed traffic volume; percentage heavy vehicles by time of day; and details of the calculation process. These details should be consistent with any traffic study carried out in the EIS.

- Where blasting is intended an assessment in accordance with the *Technical Basis for Guidelines to Minimise Annoyance due to Blasting Overpressure and Ground Vibration* (ANZECC, 1990) should be undertaken. The following details of the blast design should be included in the noise assessment:
  a) bench height, burden spacing, spacing burden ratio
  b) blast hole diameter, inclination and spacing
  c) type of explosive, maximum instantaneous charge, initiation, blast block size, blast frequency.

Describe management and mitigation measures

- Determine the most appropriate noise mitigation measures and expected noise reduction including both noise controls and management of impacts for both construction and operational noise. This will include selecting quiet equipment and construction methods, noise barriers or acoustic screens, location of stockpiles, temporary offices, compounds and vehicle routes, scheduling of activities, etc.
- For traffic noise impacts, provide a description of the ameliorative measures considered (if required), reasons for inclusion or exclusion, and procedures for calculation of noise levels including ameliorative measures. Also include, where necessary, a discussion of any potential problems associated with the proposed ameliorative measures, such as overshadowing effects from barriers. Appropriate ameliorative measures may include:
  a) use of alternative transportation modes, alternative routes, or other methods of avoiding the new road usage
  b) control of traffic (eg: limiting times of access or speed limitations)
  c) resurfacing of the road using a quiet surface
  d) use of (additional) noise barriers or bunds
  e) treatment of the façade to reduce internal noise levels buildings where the night-time criteria is a major concern
  f) more stringent limits for noise emission from vehicles (i.e. using specially designed ‘quite’ trucks and/or trucks to use air bag suspension
  g) driver education
  h) appropriate truck routes
  i) limit usage of exhaust brakes
  j) use of premium muffles on trucks
  k) reducing speed limits for trucks
  l) ongoing community liaison and monitoring of complaints
  m) phasing in the increased road use.

4. Water

Describe baseline conditions

- Describe existing surface and groundwater quality – an assessment needs to be undertaken for any water resource likely to be affected by the proposal and for all conditions (e.g. a wet weather sampling program is needed if runoff events may cause impacts).

  Note: Methods of sampling and analysis need to conform with an accepted standard (e.g. Approved Methods for the Sampling and Analysis of Water Pollutants in NSW (DEC 2004) *or be approved and analyses undertaken by accredited laboratories).*

- Provide site drainage details and surface runoff yield.
- State the ambient Water Quality and River Flow Objectives for the receiving waters. These refer to the community's agreed environmental values and human uses endorsed by the Government as goals for the ambient waters. These environmental values are published on the website: http://www.environment.nsw.gov.au/ieo/index.htm. The EIS should state the environmental values listed for the catchment and waterway type relevant to your proposal. NB: A consolidated and approved list of environmental values are not available for groundwater resources. Where groundwater may be affected the EIS should identify appropriate groundwater environmental values and justify the choice.
- State the indicators and associated trigger values or criteria for the identified environmental values. This information should be sourced from the ANZECC 2000 *Guidelines for Fresh and Marine Water Quality* (http://www.environment.gov.au/water/publications/quality/nwqms-guidelines-4-vol1.html) (Note that, as at 2004, the NSW Water Quality Objectives booklets and website contain technical criteria derived from the 1992 version of the ANZECC Guidelines. The Water Quality Objectives remain as Government Policy, reflecting the community's environmental values and long-term goals, but the technical criteria are replaced by the more recent ANZECC 2000 Guidelines). NB: While specific guidelines for groundwater are not available, the ANCECC 2000 Guidelines endorse the application of the trigger values and decision trees as a tool to assess risk to environmental values in groundwater.
- State any locally specific objectives, criteria or targets, which have been endorsed by the government e.g. the Healthy Rivers Commission Inquiries or the NSW Salinity Strategy (DLWC, 2000) (http://www.environment.nsw.gov.au/salinity/government/nswstrategy.htm).
- Where site specific studies are proposed to revise the trigger values supporting the ambient Water Quality and River Flow Objectives, and the results are to be used for regulatory purposes (e.g. to assess whether a licensed discharge impacts on water quality objectives), then prior agreement from the EPA on the approach and study design must be obtained.
- Describe the state of the receiving waters and relate this to the relevant Water Quality and River Flow Objectives (i.e. are Water Quality and River Flow Objectives being achieved?). Proponents are generally only expected to source available data and information. However, proponents of large or high risk developments may be required to collect some ambient water quality / river flow / groundwater data to enable a suitable level of impact assessment. Issues to include in the description of the receiving waters could include:

lake or estuary flushing characteristics

n) specific human uses (e.g. exact location of drinking water offtake)

o) sensitive ecosystems or species conservation values

p) a description of the condition of the local catchment e.g. erosion levels, soils, vegetation cover, etc

q) an outline of baseline groundwater information, including, but not restricted to, depth to watertable, flow direction and gradient, groundwater quality, reliance on groundwater by surrounding users and by the environment

r) historic river flow data where available for the catchment.

Assess impacts

- No proposal should breach clause 120 of the *Protection of the Environment Operations Act* 1997 (i.e. pollution of waters is prohibited unless undertaken in accordance with relevant regulations).
- Identify and estimate the quantity of all pollutants that may be introduced into the water cycle by source and discharge point including residual discharges after mitigation measures are implemented.
- Include a rationale, along with relevant calculations, supporting the prediction of the discharges.
- Describe the effects and significance of any pollutant loads on the receiving environment. This should include impacts of residual discharges through modelling, monitoring or both, depending on the scale of the proposal. Determine changes to hydrology (including drainage patterns, surface runoff yield, flow regimes, wetland hydrologic regimes and groundwater).
- Describe water quality impacts resulting from changes to hydrologic flow regimes (such as nutrient enrichment or turbidity resulting from changes in frequency and magnitude of stream flow).
- Identify any potential impacts on quality or quantity of groundwater describing their source.
- Identify potential impacts associated with geomorphological activities with potential to increase surface water and sediment runoff or to reduce surface runoff and sediment transport. Also consider possible impacts such as bed lowering, bank lowering, instream siltation, floodplain erosion and floodplain siltation.
- Identify impacts associated with the disturbance of acid sulfate soils and potential acid sulfate soils.
- Containment of spills and leaks shall be in accordance with EPA's guidelines section 'Bunding and Spill Management' at http://www.epa.nsw.gov.au/mao/bundingspill.htm and the most recent versions of the Australian Standards referred to in the Guidelines. Containment should be designed for no-discharge.
- The significance of the impacts listed above should be predicted. When doing this it is important to predict the ambient water quality and river flow outcomes associated with the proposal and to demonstrate whether these are acceptable in terms of achieving protection of the Water Quality and River Flow Objectives. In particular the following questions should be answered:

  a) will the proposal protect Water Quality and River Flow Objectives where they are currently achieved in the ambient waters; and

  b) will the proposal contribute towards the achievement of Water Quality and River Flow Objectives over time, where they are not currently achieved in the ambient waters.

- Consult with the EPA as soon as possible if a mixing zone is proposed (a mixing zone could exist where effluent is discharged into a receiving water body, where the quality of the water being discharged does not immediately meet water quality objectives. The mixing zone could result in dilution, assimilation and decay of the effluent to allow water quality objectives to be met further downstream, at the edge of the mixing zone). The EPA will advise the proponent under what conditions a mixing zone will and will not be acceptable, as well as the information and modelling requirements for assessment.

  Note: The assessment of water quality impacts needs to be undertaken in a total catchment management context to provide a wide perspective on development impacts, in particular cumulative impacts.

- Where a licensed discharge is proposed, provide the rationale as to why it cannot be avoided through application of a reasonable level of performance, using available technology, management practice and industry guidelines.
- Where a licensed discharge is proposed, provide the rationale as to why it represents the best environmental outcome and what measures can be taken to reduce its environmental impact.
- Reference should be made to relevant guidleines, including *Managing Urban Stormwater: Soils and Construction* (Landcom, 2004), *Guidelines for Fresh and Marine Water Quality* ANZECC 2000), *Environmental Guidelines: Use of effluent by Irrigation* (DEC, 2004).

Describe management and mitigation measures

- Outline stormwater management to control pollutants at the source and contain them within the site. Also describe measures for maintaining and monitoring any stormwater controls.
- Outline erosion and sediment control measures directed at minimising disturbance of land, minimising water flow through the site and filtering, trapping or detaining sediment. Also include measures to maintain and monitor controls as well as rehabilitation strategies.
- Describe waste water treatment measures that are appropriate to the type and volume of waste water and are based on a hierarchy of avoiding generation of waste water; capturing all contaminated water (including stormwater) on the site; reusing/recycling waste water; and treating any unavoidable discharge from the site to meet specified water quality requirements.
- Outline pollution control measures relating to storage of materials, possibility of accidental spills (e.g. preparation of contingency plans), appropriate disposal methods, and generation of leachate.
- Describe hydrological impact mitigation measures including:
  a) site selection (avoiding sites prone to flooding and waterlogging, actively eroding or affected by deposition)
  b) minimising runoff
  c) minimising reductions or modifications to flow regimes
  d) avoiding modifications to groundwater.
- Describe groundwater impact mitigation measures including:
  a) site selection
  b) retention of native vegetation and revegetation
  c) artificial recharge
  d) providing surface storages with impervious linings
  e) monitoring program.
- Describe geomorphological impact mitigation measures including:
  a) site selection
  b) erosion and sediment controls
  c) minimising instream works
  d) treating existing accelerated erosion and deposition

e) monitoring program.

- Any proposed monitoring should be undertaken in accordance with the *Approved Methods for the Sampling and Analysis of Water Pollutants in NSW* (DEC 2004).

5. Soils and contamination

Describe baseline conditions

- Provide any details (in addition to those provided in the location description - Section C) that are needed to describe the existing situation in terms of soil types and properties and soil contamination.

Assess impacts

- Identify any likely impacts resulting from the construction or operation of the proposal, including the likelihood of:
  a) disturbing any existing contaminated soil
  b) contamination of soil by operation of the activity
  c) subsidence or instability
  d) soil erosion
  e) disturbing acid sulfate or potential acid sulfate soils.
- Reference should be made to relevant guidelines, including *Contaminated Sites – Guidelines for Consultants Reporting on Contaminated Sites* (OEH, 2011)*; Guidelines on the Duty to Report Contamination under the Contaminated Land Management Act 1997* (EPA, 2015).

Describe management and mitigation measures

- Describe and assess the effectiveness or adequacy of any soil management and mitigation measures during construction and operation of the proposal including:
  a) erosion and sediment control measures
  b) proposals for site remediation – see *Managing Land Contamination, Planning Guidelines SEPP 55 – Remediation of Land* (Department of Urban Affairs and Planning and Environment Protection Authority, 1998)
  c) proposals for the management of these soils – see *Acid Sulfate Soil Manual* (Acid Sulfate Soil Advisory Committee 1998) and *Acid Sulfate Soils Assessment Guidelines* (Acid Sulfate Soil Advisory Committee 1998).

6. Waste and chemicals

Describe baseline conditions

- Describe any existing waste or chemicals operations related to the proposal.

Assess impacts

- Assess the adequacy of proposed measures to minimise natural resource consumption and minimise impacts from the handling, transporting, storage, processing and reprocessing of waste and/or chemicals.
- Reference should be made to: the EPA's *Waste Classification Guidelines 2014 (as in force from time to time)*
- If the proposal is an energy from waste facility it must:
    - demonstrate that the proposed operation will comply with the NSW EPA's Energy from Waste Policy Statement;
    - describe of the classes and quantities of waste that would be thermally treated at the facility;
    - demonstrate that waste used as a feedstock in the waste to energy plant would be the residual from a resource recovery process that maximises the recovery of material;
    - detail procedures that would be implemented to control the inputs to the waste to energy plant, including contingency measures that would be implemented if inappropriate materials are identified;
    - detail the location and size of stockpiles of unprocessed and processed recycled waste at the site;
    - demonstrate any waste material (e.g. biochar, ash) produced from the waste to energy facility for land application is fit-for-purpose and poses minimal risk of harm to the environment in order to meet the requirements for consideration of a resource recovery order and /or exemption by the EPA;
    - detail procedures for the management of other solid, liquid and gaseous waste streams;
    - describe how waste would be treated, stored, used, disposed and handled on site, and transported to and from the site, and the potential impacts associated with these issues, including current and future offsite waste disposal methods; and
    - identify the measures that would be implemented to ensure that the development is consistent with the aims, objectives and guidance in the *NSW Waste Avoidance and Resource Recovery Strategy 2014-21*.

Describe management and mitigation measures

- Outline measures to minimise the consumption of natural resources.
- Outline measures to avoid the generation of waste and promote the re-use and recycling and reprocessing of any waste.
- Outline measures to support any approved regional or industry waste plans.

7. Cumulative impacts

- Identify the extent that the receiving environment is already stressed by existing development and background levels of emissions to which this proposal will contribute.
- Assess the impact of the proposal against the long term air, noise and water quality objectives for the area or region.
- Identify infrastructure requirements flowing from the proposal (e.g. water and sewerage services, transport infrastructure upgrades).
- Assess likely impacts from such additional infrastructure and measures reasonably available to the proponent to contain such requirements or mitigate their impacts (e.g. travel demand management strategies).

F. List of approvals and licences

- Identify all approvals and licences required under environment protection legislation including details of all scheduled activities, types of ancillary activities and types of discharges (to air, land, water).

G. Compilation of mitigation measures

- Outline how the proposal and its environmental protection measures would be implemented and managed in an integrated manner so as to demonstrate that the proposal is capable of complying with statutory obligations under EPA licences or approvals (e.g. outline of an environmental management plan).
- The mitigation strategy should include the environmental management and cleaner production principles which would be followed when planning, designing, establishing and operating the proposal. It should include two sections, one setting out the program for managing the proposal and the other outlining the monitoring program with a feedback loop to the management program.

H. Justification for the Proposal

- Reasons should be included which justify undertaking the proposal in the manner proposed, having regard to the potential environmental impacts.

ATTACHMENT B: GUIDANCE MATERIAL

Title	Web address
Relevant Legislation	
Contaminated Land Management Act 1997	http://www.legislation.nsw.gov.au/#/view/act/1997/140
Environmentally Hazardous Chemicals Act 1985	http://www.legislation.nsw.gov.au/#/view/act/1985/14
Environmental Planning and Assessment Act 1979	http://www.legislation.nsw.gov.au/#/view/act/1979/203
Protection of the Environment Operations Act 1997	http://www.legislation.nsw.gov.au/#/view/act/1997/156
Water Management Act 2000	http://www.legislation.nsw.gov.au/#/view/act/2000/92
Licensing	
Guide to Licensing	www.epa.nsw.gov.au/licensing/licenceguide.htm
Air Issues	
Air Quality	
Approved methods for modelling and assessment of air pollutants in NSW (2016)	http://www.epa.nsw.gov.au/air/appmethods.htm
POEO (Clean Air) Regulation 2010	http://www.legislation.nsw.gov.au/#/view/regulation/2010/428
Noise and Vibration	
NSW Noise Policy for Industry	http://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/noise-policy-for-industry-(2017)
Interim Construction Noise Guideline (DECC, 2009)	http://www.epa.nsw.gov.au/noise/constructnoise.htm
Assessing Vibration: a technical guideline (DEC, 2006)	http://www.epa.nsw.gov.au/noise/vibrationguide.htm
NSW Road Noise Policy (DECCW, 2011)	http://www.epa.nsw.gov.au/your-environment/noise/transport-noise
NSW Rail Infrastructure Noise Guideline (EPA, 2013)	http://www.epa.nsw.gov.au/your-environment/noise/transport-noise
Human Health Risk Assessment	

Environmental Health Risk Assessment: Guidelines for assessing human health risks from environmental hazards (enHealth, 2012)	http://www.eh.org.au/documents/item/916
Waste, Chemicals and Hazardous Materials and Radiation	
Waste	
Environmental Guidelines: Solid Waste Landfills (EPA, 2016)	http://www.epa.nsw.gov.au/waste/landfill-sites.htm
Draft Environmental Guidelines - Industrial Waste Landfilling (April 1998)	http://www.epa.nsw.gov.au/resources/waste/envguidlns/industrialfill.pdf
EPA's Waste Classification Guidelines 2014	http://www.epa.nsw.gov.au/wasteregulation/classify-guidelines.htm
Resource recovery orders and exemptions	http://www.epa.nsw.gov.au/wasteregulation/orders-exemptions.htm
European Unions Waste Incineration Directive 2000	http://ec.europa.eu/environment/archives/air/stationary/wid/legislation.htm
EPA's Energy from Waste Policy Statement	http://www.epa.nsw.gov.au/wastestrategy/energy-from-waste.htm
NSW Waste Avoidance and Resource Recovery Strategy 2014-2021	http://www.epa.nsw.gov.au/wastestrategy/warr.htm
Chemicals subject to Chemical Control Orders	
Chemical Control Orders (regulated through the EHC Act)	http://www.epa.nsw.gov.au/pesticides/CCOs.htm
National Protocol - Approval/Licensing of Trials of Technologies for the Treatment/Disposal of Schedule X Wastes - July 1994	Available in libraries
National Protocol for Approval/Licensing of Commercial Scale Facilities for the Treatment/Disposal of Schedule X Wastes - July 1994	Available in libraries
Water and Soils	
Acid sulphate soils	
Coastal acid sulfate soils guidance material	http://www.environment.nsw.gov.au/acidsulfatesoil/ and http://www.epa.nsw.gov.au/mao/acidsulfatesoils.htm
Acid Sulfate Soils Planning Maps	http://www.environment.nsw.gov.au/acidsulfatesoil/riskmaps.htm
Contaminated Sites Assessment and Remediation	
Managing land contamination: Planning Guidelines – SEPP 55 Remediation of Land	http://www.epa.nsw.gov.au/clm/planning.htm

Guidelines for Consultants Reporting on Contaminated Sites (EPA, 2000)	http://www.epa.nsw.gov.au/resources/clm/20110650consultantsglines.pdf
Guidelines for the NSW Site Auditor Scheme - 2nd edition (DEC, 2006)	http://www.epa.nsw.gov.au/resources/clm/auditorglines06121.pdf
Sampling Design Guidelines (EPA, 1995)	http://www.epa.nsw.gov.au/resources/clm/95059sampgdlne.pdf
National Environment Protection (Assessment of Site Contamination) Measure 1999 (or update)	http://www.scew.gov.au/nepms/assessment-site-contamination
Soils – general	
Managing land and soil	http://www.environment.nsw.gov.au/soils/landandsoil.htm
Managing urban stormwater for the protection of soils	http://www.environment.nsw.gov.au/stormwater/publications.htm
Landslide risk management guidelines	http://australiangeomechanics.org/admin/wp-content/uploads/2010/11/LRM2000-Concepts.pdf
Site Investigations for Urban Salinity (DLWC, 2002)	http://www.environment.nsw.gov.au/resources/salinity/booklet3siteinvestigationsforurbansalinity.pdf
Local Government Salinity Initiative Booklets	http://www.environment.nsw.gov.au/salinity/solutions/urban.htm
Water	
Water Quality Objectives	http://www.environment.nsw.gov.au/ieo/index.htm
ANZECC (2000) Guidelines for Fresh and Marine Water Quality	http://www.environment.gov.au/water/publications/quality/nwqms-guidelines-4-vol1.html
Applying Goals for Ambient Water Quality Guidance for Operations Officers - Mixing Zones	Contact the EPA on 131555
Approved Methods for the Sampling and Analysis of Water Pollutant in NSW (2004)	http://www.environment.nsw.gov.au/resources/legislation/approvedmethods-water.pdf

From:	David Koppers
To:	David Koppers
Subject:	FW: NSW Planning, Industry & Environment Request for SEARs for SSD-10459 Central Sydney Industrial Estate and Downer Sustainable Road Products Complex
Date:	Monday, 25 May 2020 11:53:29 AM
Attachments:	image020.png NSW Planning Environment Request Development Application SSD 9302 Viva Energy Clyde Western Area Remediation Project.msg EE FPJ 6007 Technical Review Request Aug 2019.pdf ENA EMF What We Know.pdf EE Guide for Padmount Substations.pdf

The Secretary
NSW Planning, Industry & Environment

ATTENTION: David Koppers, Senior Environmental Assessment Officer

Dear Sir or Madam

I refer to the Department's below email of 5 May 2020 regarding the Request for Secretary's Environmental Assessment Requirements (SEARs) for State Significant Development SSD-10459 at 9 Devon Street Rosehill (Lot 100 DP 1168951) within City of Parramatta LGA for Concept Plan proposal for the Central Sydney Industrial Estate and Downer Sustainable Road Products Complex. Subdivision and infrastructure works to create a new 35 hectare Central Sydney Industrial Estate; and Stage 1 works for the Development and operation of Downer's Sustainable Road Products Complex. Submissions need to be made to the Department by 19 May 2020.

Please find attached a copy of Endeavour Energy's submission made to the Department's on 6 March 2019 regarding State Significant Development Application SSD 9302 Viva Energy Clyde Western Area Remediation Project at 9 Devon Street Rosehill (Lot 100 DP 1168951). The recommendations and comments provided therein are essentially also applicable to this Development Application.

Endeavour Energy would expect that as shown in the following extract of a Draft Planning Secretary's Environmental Assessment Requirements for another proposed State Significant Development that the applicant to address in the future Environmental Impact Statement includes utilities as a key issue.

13. Utilities

The EIS shall:

- address the existing capacity of the site to service the proposed development and any augmentation requirements for utilities, including arrangements for electrical network requirements, drinking water, wastewater and recycled water
- identify the existing infrastructure on-site and any possible impacts of the construction and operation of the proposal on this infrastructure.

Subject to the foregoing and the following recommendations and comments Endeavour Energy has no objection to the Development Application.

- Network Capacity / Connection

Endeavour Energy has noted the following in the Scoping Report:

2.2.1 Subdivision and lot preparation

The proposal involves the staged development of the Central Sydney Industrial Estate on lands known as the Western Area of the former Shell Oil Refinery at Clyde. Stage 1 of the development will comprise the Downer Sustainable Road Products Complex described in the following section.

VE Property proposes the following in the site:

- The extension of key municipal services to suit the needs of each of the lots comprising:
- Electricity – supply may be required to each lot from the high voltage line along Devon Street.

2.2.2 Stage 1 – Downer Sustainable Road Products Complex

Site preparation

Areas of Lot 6 will be sealed and surface water management infrastructure installed as required after it has been levelled under the lot preparation described above. A substation may be required for provision of electricity to Lot 6.

In due course the applicant for the proposed development of the site will need to submit an application for connection of load via Endeavour Energy's Network Connections Branch to carry out the final load assessment and the method of supply will be

determined. Depending on the outcome of the assessment, any required padmount substation/s will need to be located within the property (in a suitable and accessible location) and be protected (including any associated cabling) by an easement and associated restrictions benefiting and gifted to Endeavour Energy. Please refer to the attached copy of Endeavour Energy's Mains Design Instruction MDI 0044 'Easements and Property Tenure Rights'.

Further details are available by contacting Endeavour Energy's Network Connections Branch via Head Office enquiries on telephone: 133 718 or (02) 9853 6666 from 9am - 4:30pm or on Endeavour Energy's website under 'Home > Residential and business > Connecting to our network' via the following link:

http://www.endeavourenergy.com.au/ .

Advice on the electricity infrastructure required to facilitate the proposed development (including asset relocations) can be obtained by submitting a Technical Review Request to Endeavour Energy's Network Connections Branch, the form for which FPJ6007 is attached and further details (including the applicable charges) are available from Endeavour Energy's website under 'Our connection services'. The response to these enquiries is based upon a desktop review of corporate information systems, and as such does not involve the engagement of various internal stakeholders in order to develop a 'Connection Offer'. It does provide details of preliminary connection requirements which can be considered by the applicant prior to lodging a formal application for connection of load.

Alternatively the applicant should engage a Level 3 Accredited Service Provider (ASP) approved to design distribution network assets, including underground or overhead. The ASP scheme is administered by Energy NSW and details are available on their website via the following link or telephone 13 77 88:

https://energy.nsw.gov.au/government-and-regulation/legislative-and-regulatory-requirements/asp-scheme-and-contestable-works .

Endeavour Energy is urging applicants /customers to engage with an Electrical Consultant prior to finalising plans to in order to assess and incorporate any required electricity infrastructure. In so doing the consideration can also be given to its impact on the other aspects of the proposed development.

- Network Asset Design

Endeavour Energy's Company Policy 9.2.5 'Network Asset Design', includes the following requirements for electricity connections to new urban subdivision / development:

5.11 Reticulation policy

5.11.1 Distribution reticulation

In order to improve the reliability performance of and to reduce the operating expenditure on the network over the long term the company has adopted the strategy of requiring new lines to be either underground cables or where overhead is permitted, to be predominantly of covered or insulated construction. Notwithstanding this strategy, bare wire overhead construction is appropriate and permitted in some situations as detailed below.

In areas with the potential for significant overhanging foliage, CCT is used to provide increased reliability as it is less susceptible to outages from wind-blown branches and debris than bare conductors. CCT must only be used in treed[2] areas as the probability of a direct lightning strike is low. In open areas where the line is not shielded from a direct lightning strike, bare conductors must generally be used for 11kV and 22kV reticulation.

Non-metallic Screened High Voltage Aerial Bundled Cable (NMSHVABC) must be used in areas which are heavily treed and where it is not practicable to maintain a tree clearing envelope around the conductors.

[2] A "treed" area is one with a substantial number of trees adjacent to the line, in each span. In these situations CCT is used to provide increased reliability as it is less susceptible to outages from wind-blown

5.11.1.1 Urban areas

Reticulation of new residential subdivisions will be underground. In areas of low bushfire consequence, new lines within existing overhead areas can be overhead, unless underground lines are cost justified or required by either environmental or local council requirements.

Where underground reticulation is required on a feeder that supplies a mixture of industrial, commercial and/or residential loads, the standard of underground construction will apply to all types of load within that development.

Where ducting is used, adequate spare ducts and easements must be provided at the outset to cover the final load requirements of the entire development plan.

Extensions to the existing overhead 11kV/22kV network must generally be underground. Bare wire will be used for conductor replacements and augmentations except in treed areas where CCT or NMSHVABC must be used.
Extensions to the existing overhead LV network and augmentations must either be underground or ABC. Conductor replacements greater than 100m in route length must utilise aerial bundled cable.

- Streetlighting

The streetlighting for the proposed development should be reviewed and if necessary upgraded to comply with the series of standards applying to the lighting of roads and public spaces set out in with Australian/New Zealand Standard AS/NZS 1158: 2010 'Lighting for roads and public spaces' as updated from time to time.

Whilst the determination of the appropriate lighting rests with the road controlling authority, Endeavour Energy as a Public

Lighting Service Provider is responsible for operating and maintaining the streetlights on behalf of local councils, Roads and Maritime Services and other utilities in accordance with the NSW Public Lighting Code 2019 (Code) as updated from time to time. Endeavour Energy recognises that well designed, maintained and managed Public Lighting offers a safe, secure and attractive visual environment for pedestrians and drivers during times of inadequate natural light.

For any Code implementation and administration / technical matters please contact Endeavour Energy's Substation Mains Assets Section via Head Office enquiries on telephone: 133 718 or (02) 9853 6666 from 9am - 4:30pm or email mainsenquiry@endeavourenergy.com.au .

- Hazardous and/or Offensive Development

Endeavour Energy has noted the following in the Scoping Report:

4.2.6 Hazards and risks – hazardous and/or offensive development and societal risk

The scoping worksheet determined dangerous goods and hazardous/offensive development will require a detailed assessment in the EIS and will be addressed in an appended report. Dangerous goods to be stored and used at the project will be identified and standard or site-specific management measures provided as required. The likelihood of the project qualifying as hazardous and/or offensive development will be assessed in accordance with DPIE's (2011) *Applying SEPP 33*.

The site is adjacent to the Clyde terminal, which will continue to import, store and distribute petroleum products. The risk of potential societal impacts and site-specific management measures will be assessed with a report appended to the EIS.

Endeavour Energy has traditionally focused on the likelihood of its network starting a fire. However conversely Endeavour Energy believes that applicants and determining authorities should consider the safety risks associated with inappropriate development in proximity of electricity infrastructure that may result in damage to the network and the loss of electricity supply.

Endeavour Energy is aware that the provisions of State Environmental Planning Policy No 33— Hazardous and Offensive Development (SEPP33) that in the preparation of a preliminary hazard assessment electricity infrastructure is not defined / regarded as sensitive land use. However, in similar situations Endeavour Energy has sought further advice from the consultants preparing the preliminary hazard assessment on the basis that, although not a sensitive land use in the traditional / environmental sense, if the electricity infrastructure on or in proximity of the site is damaged, the resulting outage could leave thousands of properties / customers without power. The consultants have been requested to specifically address the risks associated with the proximity of the electricity infrastructure ie. detail design considerations, technical or operational controls etc. to demonstrate as required by SEPP33 that the proposed business / development is suitably located and can be built and operated with an adequate level of safety and pollution control.

To demonstrate the significance of this, Camellia Transmission substation supplies Rosehill Zone Substation and Lennox Zone Substation as well as Ausgrid's Lidcombe Zone Substation and Auburn Zone Substation. In addition the 132,000 volt / 132 kV network that connects between Camellia Transmission Substation and Guildford Transmission Substation supplies and number of other zone substations.
The following Customer Connection Point (CCP) Report provides an indication of the number of feeders, distribution substations, customer connection points, premises and life support customers for the Endeavour Energy's two zone substations directly supplied by Camellia Transmission Substation.

Endeavour Energy

CCP Reports

Customer Connection Report by Zone Sub

CCP Type: LV Customer

Report Generated on: 2020/05/12 Total Number Of Records: 166 **Current Page: 1 / 10**

Zone Sub Name	Total Fdr.	Total Dist. Subs	Total CCPs	Total Premises	Total Life Supports	Total Critical Cust.
LENNOX	12	125	1987	11115	104	11118
ROSEHILL	10	85	1042	3053	37	3053
TOTAL	22	210	3029	14168	141	14171

- Air Quality / Dust

Although Endeavour Energy's Camellia Transmission Substation and Rosehill Zone Substations are not a 'sensitive receptor' in the traditional sense of being a habitable / residential use, the electrical equipment / operation of the site would be affective by excessive / cumulative dust emissions. Whilst the most sensitive protection, automation and control equipment is located in substation control building, the equipment in the open yard including switches, circuit breakers etc. should not be subject to excessive dust emissions eg. it could cause a flashover to occur on the insulators and start a fire in the substation. From

Endeavour Energy's perspective it is imperative that the appropriate air quality management measures are implemented and adhered to in order to minimise any impact on the nearby electricity infrastructure.

- Easement Management / Network Access

In regard to the padmount substation site/s that will be required to facilitate the proposed development , please find attached for the applicant's reference a copy Endeavour Energy's 'Guide to Fencing, Retaining Walls and Maintenance Around Padmount Substations'.

- Location of Electricity Easements / Prudent Avoidance

The incorporation of electricity easements into privately owned lots is generally problematic for both Endeavour Energy and the future landowners and requires additional easement management to ensure no uncontrolled activities / encroachments occur within the easement area.

Accordingly Endeavour Energy's recommendation is that whenever reasonably possible, easements be entirely incorporated into public reserves and not burden private lots. Endeavour Energy's preference is to have continuity of its easements over the most direct and practicable route affecting the least number of lots as possible.

This is also in keeping with a policy of prudent avoidance. In practical terms this means that when designing new transmission and distribution facilities, consideration is given to reducing exposure and increasing separation distances to more sensitive uses such as residential or schools, pre-schools, day care centres or where potentially a greater number of people are regularly exposed for extended periods of time.

These emissions are usually not an issue but with Council's permitting or encouraging development with higher density, reduced setbacks and increased building heights, but as the electricity network operates 24/7/365 (all day, every day of the year), the level of exposure can increase.

Endeavour Energy believes that irrespective of the zoning or land use, applicants (and Council) should also adopt a policy of prudent avoidance by the siting of more sensitive uses eg. the office component of an industrial building, away from and less susceptible uses such as garages, non-habitable or rooms not regularly occupied eg. storage areas in a commercial building, towards any electricity infrastructure – including any possible future electricity infrastructure required to facilitate the proposed development.

Where development is proposed near electricity infrastructure, Endeavour Energy is not responsible for any amelioration measures for such emissions that may impact on the nearby proposed development.

Please find attached a copy of Energy Networks Association's 'Electric & Magnetic Fields – What We Know' which can also be accessed via their website at https://www.energynetworks.com.au/electric-and-magnetic-fields and provides the following advice:

> *Electric fields are strongest closest to their source, and their strength diminishes rapidly as we move away from the source.*
>
> *The level of a magnetic field depends on the amount of the current (measured in amps), and decreases rapidly once we move away from the source.*

Typical magnetic field measurements associated with Endeavour Energy's activities and assets given the required easement widths, safety clearances etc. and having a maximum voltage of 132,000 volt / 132 kV, will with the observance of these separation distances not exceed the recommended magnetic field public exposure limits.

I appreciate that not all the foregoing issues may be directly or immediately relevant or significant to the request for SEARs / Development Application. However in keeping with the Department's aim of earlier and better engagement, Endeavour Energy's preference is to alert proponents / applicants of the potential matters that may arise should development within closer proximity of the existing and/or required electricity infrastructure needed to facilitate the proposed development on or in the vicinity of the site occur.

Could you please pass on a copy of this submission and the attached resources to the applicant? Should you wish to discuss this matter, or have any questions, please do not hesitate to contact me or the contacts identified above in relation to the various matters. Due to the high number of development application / planning proposal notifications submitted to Endeavour Energy, to ensure a response contact by email to property.development@endeavourenergy.com.au is preferred.

With the current COVID-19 health risk, as many as possible of Endeavour Energy staff are working from home. As a result there is only a small contingent located at the Huntingwood head office for essential operations. Although working from home, access to emails and other internal stakeholders is now somewhat limited and as a result it may take longer than usual to respond to enquiries. Thank you for your understanding during this time.

Yours faithfully
Cornelis Duba

Development Application Specialist
Network Environment & Assessment
M: 0455 250 981
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51 Huntingwood Drive, Huntingwood NSW 2148
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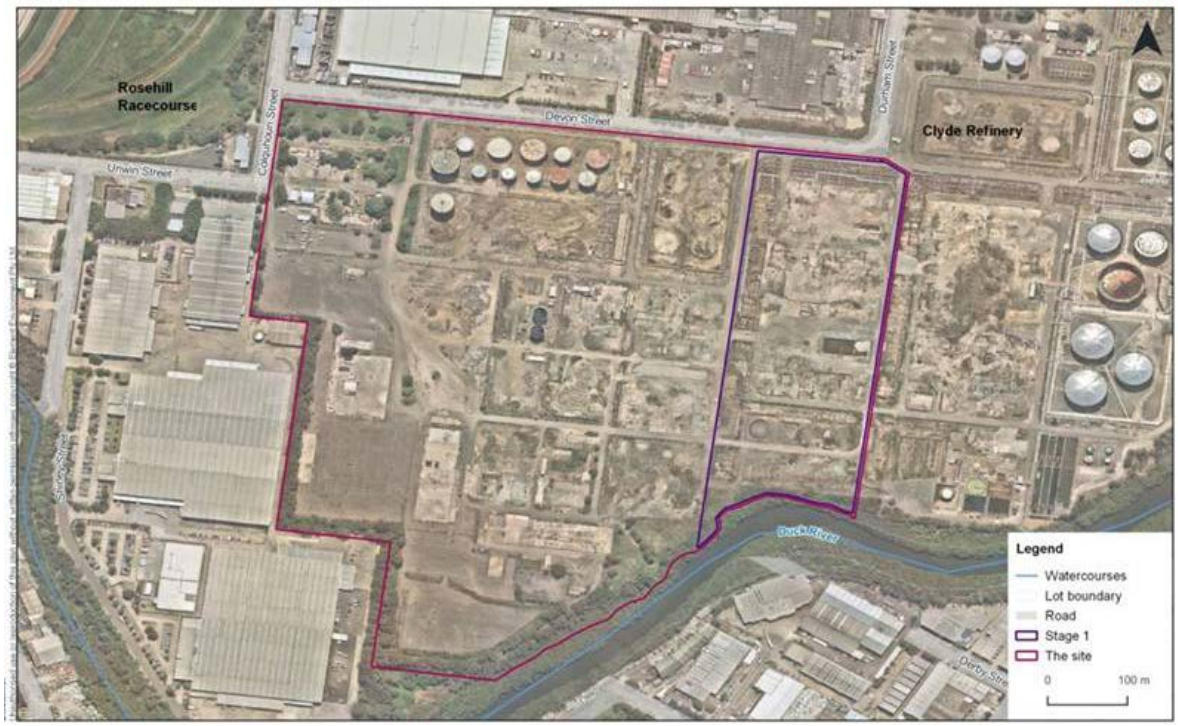
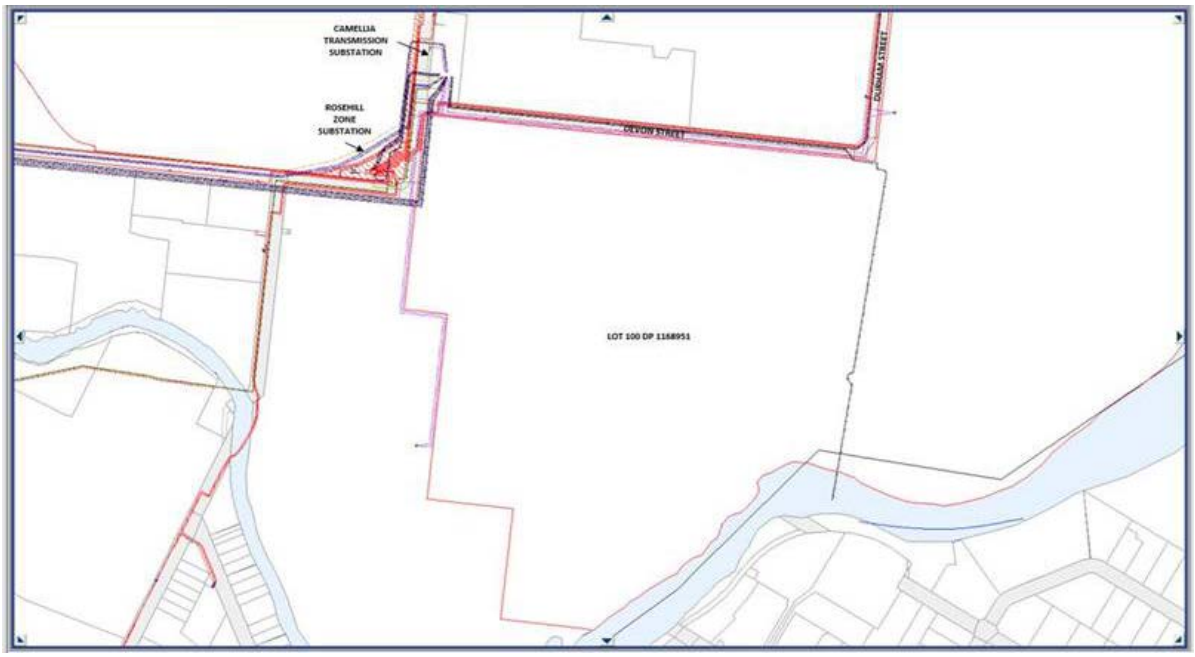
Figure 2.1
The Project

Central Sydney Industrial Estate Incorporating Sustainable Road Products Complex
STATE SIGNIFICANT DEVELOPMENT - SCOPING REPORT





Our ref: DOC20/345239
Senders ref: SSD10459 (City of Parramatta)

David Koppers
Industry Sites Assessments
Planning and Assessment Group
4 Parramatta Square
12 Darcy Street
Parramatta NSW 2150

Dear Mr Koppers,

Subject: Request for SEARs for Central Sydney Industrial Estate Incorporating Downer Sustainable Road Products Complex, 9 Devon Street, Rosehill (SSD 10459)

Thank you for your letter received on 5 May 2020, requesting input from Environment, Energy and Science Group (EES) in the Department on the SEARs for Central Sydney Industrial Estate Incorporating Downer Sustainable Road Products Complex, 9 Devon Street, Rosehill.

EES has reviewed the draft SEARs and scoping report prepared by Element dated 24 April 2020 and provides the following comments and recommendations at **Attachment A.**

Aboriginal

EES recommends the SEARs include the attached Aboriginal cultural heritage requirements.

Biodiversity

EES recommends the SEARs include the attached biodiversity requirements

Flooding

EES recommends the SEARs include the attached flooding requirements.

Soil and Water

EES recommends the SEARs include the attached soil and water requirements.

Should you have any queries regarding this matter, please contact Bronwyn Smith, Senior Conservation Planning Officer on 9873 8604 or bronwyn.smith@environment.nsw.gov.au

Yours sincerely

S. Harrison

06/05/20

Susan Harrison
Senior Team Leader Planning
Greater Sydney Branch
Climate Change and Sustainability

Attachment A – EES Environmental Assessment Requirements – Central Sydney Industrial Estate Incorporating Downer Sustainable Road Products Complex located at 9 Devon Street, Rosehill (SSD 10459)

Aboriginal cultural heritage
1. Identify and describe the Aboriginal cultural heritage values that exist across the whole area that would be affected by the development and document these in an Aboriginal Cultural Heritage Assessment Report (ACHAR). This may include the need for surface survey and test excavation. The identification of cultural heritage values must be conducted in accordance with the Code of Practice for Archaeological Investigations of Aboriginal Objects in NSW (OEH 2010), and guided by the Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW (DECCW, 2011). 2. Consultation with Aboriginal people must be undertaken and documented in accordance with the Aboriginal cultural heritage consultation requirements for proponents 2010 (DECCW). The significance of cultural heritage values for Aboriginal people who have a cultural association with the land must be documented in the ACHAR. 3. Impacts on Aboriginal cultural heritage values are to be assessed and documented in the ACHAR. The ACHAR must demonstrate attempts to avoid impact upon cultural heritage values and identify any conservation outcomes. Where impacts are unavoidable, the ACHAR must outline measures proposed to mitigate impacts. Any objects recorded as part of the assessment must be documented and notified to OEH. Note that due diligence is not an appropriate assessment, an ACHAR is required.
Biodiversity
4. Biodiversity impacts related to the proposed development are to be assessed in accordance with Section 7.9 of the Biodiversity Conservation Act 2017 the Biodiversity Assessment Method and documented in a Biodiversity Development Assessment Report (BDAR). The BDAR must include information in the form detailed in the Biodiversity Conservation Act 2016 (s6.12), Biodiversity Conservation Regulation 2017 (s6.8) and Biodiversity Assessment Method, including an assessment of the impacts of the proposal (including an assessment of impacts prescribed by the regulations). 5. The BDAR must document the application of the avoid, minimise and offset framework including assessing all direct, indirect and prescribed impacts in accordance with the Biodiversity Assessment Method.

6. The BDAR must include details of the measures proposed to address the offset obligation as follows:
    - The total number and classes of biodiversity credits required to be retired for the development/project;
    - The number and classes of like-for-like biodiversity credits proposed to be retired;
    - The number and classes of biodiversity credits proposed to be retired in accordance with the variation rules;
    - Any proposal to fund a biodiversity conservation action;
    - Any proposal to conduct ecological rehabilitation (if a mining project);
    - Any proposal to make a payment to the Biodiversity Conservation Fund.

    If seeking approval to use the variation rules, the BDAR must contain details of the reasonable steps that have been taken to obtain requisite like-for-like biodiversity credits.

7. The BDAR must be submitted with all spatial data associated with the survey and assessment as per Appendix 11 of the BAM.
8. The BDAR must be prepared by a person accredited in accordance with the Accreditation Scheme for the Application of the Biodiversity Assessment Method Order 2017 under s6.10 of the Biodiversity Conservation Act 2016.

Water and soils

9. The EIS must map the following features relevant to water and soils including:
    a. Acid sulfate soils (Class 1, 2, 3 or 4 on the Acid Sulfate Soil Planning Map).
    b. Rivers, streams, wetlands, estuaries (as described in s4.2 of the Biodiversity Assessment Method).
    c. Wetlands as described in s4.2 of the Biodiversity Assessment Method.
    d. Groundwater.
    e. Groundwater dependent ecosystems
    f. Proposed intake and discharge locations

10. The EIS must describe background conditions for any water resource likely to be affected by the development, including:
    a. Existing surface and groundwater.
    b. Hydrology, including volume, frequency and quality of discharges at proposed intake and discharge locations.

c. Water Quality Objectives (as endorsed by the NSW Government http://www.environment.nsw.gov.au/ieo/index.htm) including groundwater as appropriate that represent the community's uses and values for the receiving waters.
d. Indicators and trigger values/criteria for the environmental values identified at (c) in accordance with the ANZECC (2000) Guidelines for Fresh and Marine Water Quality and/or local objectives, criteria or targets endorsed by the NSW Government.
e. Risk-based Framework for Considering Waterway Health Outcomes in Strategic Land-use Planning Decisions http://www.environment.nsw.gov.au/research-and-publications/publications-search/risk-based-framework-for-considering-waterway-health-outcomes-in-strategic-land-use-planning

11. The EIS must assess the impacts of the development on water quality, including:
a. The nature and degree of impact on receiving waters for both surface and groundwater, demonstrating how the development protects the Water Quality Objectives where they are currently being achieved, and contributes towards achievement of the Water Quality Objectives over time where they are currently not being achieved. This should include an assessment of the mitigating effects of proposed stormwater and wastewater management during and after construction.
b. Identification of proposed monitoring of water quality.
c. Consistency with any relevant certified Coastal Management Program (or Coastal Zone Management Plan).

12. The EIS must assess the impact of the development on hydrology, including:
    a. Water balance including quantity, quality and source.
    b. Effects to downstream rivers, wetlands, estuaries, marine waters and floodplain areas.
    c. Effects to downstream water-dependent fauna and flora including groundwater dependent ecosystems.
    d. Impacts to natural processes and functions within rivers, wetlands, estuaries and floodplains that affect river system and landscape health such as nutrient flow, aquatic connectivity and access to habitat for spawning and refuge (e.g. river benches).
    e. Changes to environmental water availability, both regulated/licensed and unregulated/rules-based sources of such water.
    f. Mitigating effects of proposed stormwater and wastewater management during and after construction on hydrological attributes such as volumes, flow rates, management methods and re-use options.
    g. Identification of proposed monitoring of hydrological attributes.

Flooding and coastal hazards

13. The EIS must map the following features relevant to flooding as described in the Floodplain Development Manual 2005 (NSW Government 2005) including:
    a. Flood prone land.
    b. Flood planning area, the area below the flood planning level.
    c. Hydraulic categorisation (floodways and flood storage areas)
    d. Flood Hazard.
14. The EIS must describe flood assessment and modelling undertaken in determining the design flood levels for events, including a minimum of the 5% Annual Exceedance Probability (AEP), 1% AEP, flood levels and the probable maximum flood, or an equivalent extreme event.
15. The EIS must model the effect of the proposed development (including fill) on the flood behaviour under the following scenarios:
    a. Current flood behaviour for a range of design events as identified in 14 above. This includes the 0.5% and 0.2% AEP year flood events as proxies for assessing sensitivity to an increase in rainfall intensity of flood producing rainfall events due to climate change.
16. Modelling in the EIS must consider and document:

a. Existing council flood studies in the area and examine consistency to the flood behaviour documented in these studies.
b. The impact on existing flood behaviour for a full range of flood events including up to the probable maximum flood, or an equivalent extreme flood.
c. Impacts of the development on flood behaviour resulting in detrimental changes in potential flood affection of other developments or land. This may include redirection of flow, flow velocities, flood levels, hazard categories and hydraulic categories
d. Relevant provisions of the NSW Floodplain Development Manual 2005.

17. The EIS must assess the impacts on the proposed development on flood behaviour, including:
    a. Whether there will be detrimental increases in the potential flood affectation of other properties, assets and infrastructure.
    b. Consistency with Council floodplain risk management plans.
    c. Consistency with any Rural Floodplain Management Plans.
    d. Compatibility with the flood hazard of the land.
    e. Compatibility with the hydraulic functions of flow conveyance in floodways and storage in flood storage areas of the land.
    f. Whether there will be adverse effect to beneficial inundation of the floodplain environment, on, adjacent to or downstream of the site.
    g. Whether there will be direct or indirect increase in erosion, siltation, destruction of riparian vegetation or a reduction in the stability of riverbanks or watercourses.
    h. Any impacts the development may have upon existing community emergency management arrangements for flooding. These matters are to be discussed with the NSW SES and Council.
    i. Whether the proposal incorporates specific measures to manage risk to life from flood. These matters are to be discussed with the NSW SES and Council.
    j. Emergency management, evacuation and access, and contingency measures for the development considering the full range or flood risk (based upon the probable maximum flood or an equivalent extreme flood event). These matters are to be discussed with and have the support of Council and the NSW SES.
    k. Any impacts the development may have on the social and economic costs to the community as consequence of flooding.

(END OF SUBMISSION)

Aboriginal cultural heritage

4. Identify and describe the Aboriginal cultural heritage values that exist across the whole area that would be affected by the development and document these in an Aboriginal Cultural Heritage Assessment Report (ACHAR). This may include the need for surface survey and test excavation. The identification of cultural heritage values must be conducted in accordance with the Code of Practice for Archaeological Investigations of Aboriginal Objects in NSW (OEH 2010), and guided by the Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW (DECCW, 2011).
5. Consultation with Aboriginal people must be undertaken and documented in accordance with the Aboriginal cultural heritage consultation requirements for proponents 2010 (DECCW). The significance of cultural heritage values for Aboriginal people who have a cultural association with the land must be documented in the ACHAR.
6. Impacts on Aboriginal cultural heritage values are to be assessed and documented in the ACHAR. The ACHAR must demonstrate attempts to avoid impact upon cultural heritage values and identify any conservation outcomes. Where impacts are unavoidable, the ACHAR must outline measures proposed to mitigate impacts. Any objects recorded as part of the assessment must be documented and notified to OEH.

   Note that due diligence is not an appropriate assessment, an ACHAR is required.

Biodiversity

18. Biodiversity impacts related to the proposed development are to be assessed in accordance with Section 7.9 of the Biodiversity Conservation Act 2017 the Biodiversity Assessment Method and documented in a Biodiversity Development Assessment Report (BDAR). The BDAR must include information in the form detailed in the Biodiversity Conservation Act 2016 (s6.12), Biodiversity Conservation Regulation 2017 (s6.8) and Biodiversity Assessment Method, including an assessment of the impacts of the proposal (including an assessment of impacts prescribed by the regulations).
19. The BDAR must document the application of the avoid, minimise and offset framework including assessing all direct, indirect and prescribed impacts in accordance with the Biodiversity Assessment Method.
20. The BDAR must include details of the measures proposed to address the offset obligation as follows:

a. The total number and classes of biodiversity credits required to be retired for the development/project;
b. The number and classes of like-for-like biodiversity credits proposed to be retired;
c. The number and classes of biodiversity credits proposed to be retired in accordance with the variation rules;
d. Any proposal to fund a biodiversity conservation action;
e. Any proposal to conduct ecological rehabilitation (if a mining project);
f. Any proposal to make a payment to the Biodiversity Conservation Fund.

If seeking approval to use the variation rules, the BDAR must contain details of the reasonable steps that have been taken to obtain requisite like-for-like biodiversity credits.

21. The BDAR must be submitted with all spatial data associated with the survey and assessment as per Appendix 11 of the BAM.
22. The BDAR must be prepared by a person accredited in accordance with the Accreditation Scheme for the Application of the Biodiversity Assessment Method Order 2017 under s6.10 of the Biodiversity Conservation Act 2016.

Water and soils

23. The EIS must map the following features relevant to water and soils including:
    g. Acid sulfate soils (Class 1, 2, 3 or 4 on the Acid Sulfate Soil Planning Map).
    h. Rivers, streams, wetlands, estuaries (as described in s4.2 of the Biodiversity Assessment Method).
    i. Wetlands as described in s4.2 of the Biodiversity Assessment Method.
    j. Groundwater.
    k. Groundwater dependent ecosystems
    l. Proposed intake and discharge locations

24. The EIS must describe background conditions for any water resource likely to be affected by the development, including:
    f. Existing surface and groundwater.
    g. Hydrology, including volume, frequency and quality of discharges at proposed intake and discharge locations.
    h. Water Quality Objectives (as endorsed by the NSW Government http://www.environment.nsw.gov.au/ieo/index.htm) including groundwater as appropriate that represent the community's uses and values for the receiving waters.

i. Indicators and trigger values/criteria for the environmental values identified at (c) in accordance with the ANZECC (2000) Guidelines for Fresh and Marine Water Quality and/or local objectives, criteria or targets endorsed by the NSW Government.

j. Risk-based Framework for Considering Waterway Health Outcomes in Strategic Land-use Planning Decisions http://www.environment.nsw.gov.au/research-and-publications/publications-search/risk-based-framework-for-considering-waterway-health-outcomes-in-strategic-land-use-planning

25. The EIS must assess the impacts of the development on water quality, including:

a. The nature and degree of impact on receiving waters for both surface and groundwater, demonstrating how the development protects the Water Quality Objectives where they are currently being achieved, and contributes towards achievement of the Water Quality Objectives over time where they are currently not being achieved. This should include an assessment of the mitigating effects of proposed stormwater and wastewater management during and after construction.

b. Identification of proposed monitoring of water quality.

d. Consistency with any relevant certified Coastal Management Program (or Coastal Zone Management Plan).

26. The EIS must assess the impact of the development on hydrology, including:
    h. Water balance including quantity, quality and source.
    i. Effects to downstream rivers, wetlands, estuaries, marine waters and floodplain areas.
    j. Effects to downstream water-dependent fauna and flora including groundwater dependent ecosystems.
    k. Impacts to natural processes and functions within rivers, wetlands, estuaries and floodplains that affect river system and landscape health such as nutrient flow, aquatic connectivity and access to habitat for spawning and refuge (e.g. river benches).
    l. Changes to environmental water availability, both regulated/licensed and unregulated/rules-based sources of such water.
    m. Mitigating effects of proposed stormwater and wastewater management during and after construction on hydrological attributes such as volumes, flow rates, management methods and re-use options.
    n. Identification of proposed monitoring of hydrological attributes.

Flooding and coastal hazards

27. The EIS must map the following features relevant to flooding as described in the Floodplain Development Manual 2005 (NSW Government 2005) including:
    e. Flood prone land.
    f. Flood planning area, the area below the flood planning level.
    g. Hydraulic categorisation (floodways and flood storage areas)
    h. Flood Hazard.
28. The EIS must describe flood assessment and modelling undertaken in determining the design flood levels for events, including a minimum of the 5% Annual Exceedance Probability (AEP), 1% AEP, flood levels and the probable maximum flood, or an equivalent extreme event.
29. The EIS must model the effect of the proposed development (including fill) on the flood behaviour under the following scenarios:
    a. Current flood behaviour for a range of design events as identified in 14 above. This includes the 0.5% and 0.2% AEP year flood events as proxies for assessing sensitivity to an increase in rainfall intensity of flood producing rainfall events due to climate change.
30. Modelling in the EIS must consider and document:

e. Existing council flood studies in the area and examine consistency to the flood behaviour documented in these studies.
f. The impact on existing flood behaviour for a full range of flood events including up to the probable maximum flood, or an equivalent extreme flood.
g. Impacts of the development on flood behaviour resulting in detrimental changes in potential flood affection of other developments or land. This may include redirection of flow, flow velocities, flood levels, hazard categories and hydraulic categories
h. Relevant provisions of the NSW Floodplain Development Manual 2005.

31. The EIS must assess the impacts on the proposed development on flood behaviour, including:

l. Whether there will be detrimental increases in the potential flood affectation of other properties, assets and infrastructure.
m. Consistency with Council floodplain risk management plans.
n. Consistency with any Rural Floodplain Management Plans.
o. Compatibility with the flood hazard of the land.
p. Compatibility with the hydraulic functions of flow conveyance in floodways and storage in flood storage areas of the land.
q. Whether there will be adverse effect to beneficial inundation of the floodplain environment, on, adjacent to or downstream of the site.
r. Whether there will be direct or indirect increase in erosion, siltation, destruction of riparian vegetation or a reduction in the stability of river banks or watercourses.
s. Any impacts the development may have upon existing community emergency management arrangements for flooding. These matters are to be discussed with the NSW SES and Council.
t. Whether the proposal incorporates specific measures to manage risk to life from flood. These matters are to be discussed with the NSW SES and Council.
u. Emergency management, evacuation and access, and contingency measures for the development considering the full range or flood risk (based upon the probable maximum flood or an equivalent extreme flood event). These matters are to be discussed with and have the support of Council and the NSW SES.
v. Any impacts the development may have on the social and economic costs to the community as consequence of flooding.

(END OF SUBMISSION)

SafeWork NSW | Chemicals, Explosives and Safety Auditing
Major Hazard Facilities
4 Parramatta Square – Level 29, 12 Darcy Street
Parramatta NSW 2150
mhf@safework.nsw.gov.au
SafeWork NSW Assistance Service **13 10 50**
safework.nsw.gov.au

Date: 19 May 2020

Our Ref: 2020/005455

Mr David Koppers
Senior Environmental Assessment Officer – Industry Assessments
Department of Planning, Industry and Environment
4 Parramatta Square, 12 Darcy Street
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Mr Koppers

Request for SEARs for the Central Sydney Industrial Estate and Downer Sustainable Road Products Complex (SSD-10459) (City of Parramatta)

Thank you for your email dated 05 May 2020 requesting SEARs for the above project.

We note that the only dangerous good likely to be present at the proposed site in significant quantities will be bitumen. The only specific issues we note under our jurisdiction that need to be addressed in the SEARs are:

- the EIA must address the possible impacts of any incident at the proposed facility on the nearby Viva petroleum storage terminal and the truck loading gantry
- identification of and control of risks to any underground pipelines and power cables that may be present on site.

Should you require further information, please contact Sohan Fernando on 0409 646 444 or email Sohan.Fernando@safework.nsw.gov.au

Yours sincerely

Michael Wright
Manager Major Hazard Facilities

SM-20-00053419

18 May 2020

David Koppers
Senior Environmental Assessment Officer
Department of Planning, Industry and Environment
By Email: david.koppers@planning.nsw.gov.au

Dear Sir/Madam

State Environmental Planning Policy (Infrastructure) 2007
Development Application – SSD-10459
9 Devon Street, Rosehill (Lot 100 DP1168951)

Thank you for your letter dated 5 May 2020 to Sydney Metro requesting input into the Department of Planning, Industry and Environment Secretary's Environmental Assessment Requirements (SEARs) for the proposal including details of any key issues and assessment requirements, in accordance with clause 86 of the *State Environmental Planning Policy (Infrastructure) 2007* (**ISEPP**).

The Sydney Metro West Environmental Impact Statement (EIS) is currently on exhibition together with ISEPP maps for the Sydney Metro West. A portion of the site is located in the Sydney Metro West rail corridor.

Transport for NSW (TfNSW) has delegated its rail authority functions in relation to the Sydney Metro West rail corridor to Sydney Metro. Therefore, Sydney Metro is the relevant rail authority for the Sydney Metro West rail corridor for the purpose of the ISEPP.

Concurrence of Sydney Metro is not required
Sydney Metro understands that the development the subject of the DA is State Significant Development (SSD).

As this is a SSD development application, the provisions of clause 86 of the ISEPP do not apply.

Section 4.13(2A) of the *Environmental Planning and Assessment Act 1979* excludes concurrence or consultation requirements from applying to development applications for SSD, unless an environmental planning instrument requires concurrence or consultation to SSD. As clause 86 of the ISEPP does not require concurrence to be provided in the context of a development application for SSD, concurrence is not required for the DA.

Notwithstanding this, in order to ensure the appropriate management and mitigation of the proposed development's impacts on the Sydney Metro West rail corridor, Sydney Metro has reviewed the Scoping Report attached to the Department of Planning, Industry and Environment's letter of 5 May 2020, including having regard to the matters outlined in the ISEPP.

Based on this review, Sydney Metro requests:

- Consideration of the State Environmental Planning Policy (Infrastructure) 2007

- Consideration of the Sydney Metro Underground Corridor Protection Guidelines (available from www.sydneymetro.info).
- Consultation with Sydney Metro.

Next steps

Finally, please note that the DA may also have impacts on rail corridors which are not the responsibility of Sydney Metro. If these impacts trigger any comments function of the relevant rail authority under the ISEPP, the DA will need to be referred to that other rail authority for a separate comments response.

Sydney Metro thanks the Department of Planning, Industry and Environment for its assistance.

Please contact Peter Bourke, Senior Manager Corridor Protection on 02 8265 6015 or Denise Thornton on 02 8265 9658 or email sydneymetrocorridorprotection@transport.nsw.gov.au should you wish to discuss this matter further.

Yours sincerely

Phil Leijten
Director
Place Making and Precinct Activation

13 May 2020

David Koppers
Senior Environmental Assessment Officer
Industry Assessments
Department of Planning, Industry & Environment
E: david.koppers@planning.nsw.gov.au

Sydney Water input to SEARs for Central Sydney Industrial Estate (SSD-10459)

Thank you for seeking Sydney Water's input to the Secretary's Environmental Assessment Requirements for the abovementioned development which proposes subdivision and infrastructure works to create a new 35 hectare Central Sydney Industrial Estate and the development and operation of Downer's Sustainable Road Products Complex as stage 1.

Sydney Water have reviewed the proposal and provide the following comments for your consideration:

- Sydney Water requests that **detailed domestic and industrial water and wastewater demands** be specified within the Environmental Impact Statement in order to fully inform servicing options.
- Indicative Stormwater, trade wastewater and water re-use quantities should also be included within the EIS report.
- It is recommended that the proponent engages a Water Servicing Coordinator and meetings are held between the proponent and Sydney Water to ensure that Sydney Water's requirements inform the design process.

Sydney Water also requests that the Department of Planning, Industry and Environment include the following Secretary's Environmental Assessment Requirements relating to the provision of water-related services for the subject site:

Water-related Infrastructure Requirements

1. The proponent of the development should **determine, and detail service demands** following servicing investigations to demonstrate that satisfactory arrangements for drinking water, wastewater, and if required, recycled water services have been made.
2. The proponent must obtain endorsement and/or approval from Sydney Water to ensure that the proposed development does not adversely impact on any existing water, wastewater or stormwater main, or any other Sydney Water asset, including any easement or property. When determining landscaping options, the proponent should take into account that certain tree species can cause cracking or blockage of Sydney Water pipes and therefore should be avoided.

3. Strict requirements for Sydney Water's stormwater assets (for certain types of development) may apply to this site. The proponent should ensure that satisfactory steps/measures are taken to protect existing stormwater assets, such as avoiding building over and/or adjacent to stormwater assets and building bridges over stormwater assets. The proponent should consider taking measures to minimise or eliminate potential flooding, degradation of water quality, and avoid adverse impacts on any heritage items, and create pipeline easements where required.
4. As this development creates trade wastewater, Sydney Water has trade wastewater requirements which need to be met. By law, the property owner must submit an application requesting permission to discharge trade wastewater to Sydney Water's sewerage system. The proponent must obtain Sydney Water approval for this permit before any business activities can commence. Given this development comprises industrial operations, wastewater may discharge into a sewerage area that is subject to wastewater reuse. Please contact Sydney Water's Business Customer Services to send your permit application or to find out more information. They can be contacted at the following email address: businesscustomers@sydneywater.com.au.

Integrated Water Cycle Management

5. The proponent should outline any sustainability initiatives that will minimise/reduce the demand for drinking water, including any alternative water supply and end uses of drinking and non-drinking water that may be proposed, and demonstrate water sensitive urban design (principles are used), and any water conservation measures that are likely to be proposed. This will allow Sydney Water to determine the impact of the proposed development on our existing services and required system capacity to service the development.

If you require any further information, please contact the Growth Planning Team at urbangrowth@sydneywater.com.au.

Yours sincerely,

Kristine Leitch
Growth Intelligence Manager
City Growth and Development, Business Development
Sydney Water, 1 Smith Street, Parramatta NSW 2150

Mr David Koppers
Senior Environmental Assessment Officer
Industry Assessments
Department of Planning, Industry and Environment
GPO Box 39
Sydney NSW 2001

Dear Mr Koppers

Request for SEARs for Central Sydney Industrial Estate and Downer Sustainable Road Products Complex (SSD-10459)

Thank you for your correspondence via the Major Projects Portal on 5 May 2020, requesting Transport for NSW (TfNSW) to review and comment on the above.

The suggested inclusions to the SEARs in relation to the following are provide in **TAB A**:

- Strategic and Statutory Context;
- Traffic and Transport Assessment (Construction and Operation); and
- Consultation.

If you require clarification on the above, please don't hesitate to contact Para Sangar, Senior Transport Planner, Land Use Planning and Development on 0466 024 892.

Yours sincerely

18/5/2020

Mark Ozinga
Principal Manager Land Use Planning and Development
Customer Strategy and Technology

Objective Reference CD20/03753

TAB A – Suggested Inclusions to the SEARs

Strategic and Statutory Context

The EIS shall address the relevant planning provisions, goals and strategic planning objectives in the following:

- NSW State and Premier Priorities;
- Sydney Region Plan: A Metropolis of Three Cities;
- Central City District Plan;
- Future Transport Strategy 2056;
- State Infrastructure Strategy 2018;
- Sustainable Sydney 2030;
- Guide to Traffic Generating Developments;
- NSW Freight and Ports Strategy;
- Sustainable Sydney 2030; and
- NSW Bicycle Guidelines.

Traffic and Transport Assessment (Construction and Operation)

A Traffic and Transport Assessment that shall include, not to be limited to, the following:

- Details of the current daily and peak hour vehicle, public transport, pedestrian and bicycle movements and existing traffic and transport facilities provided on the road network located adjacent to the proposed development;
- An assessment of the operation of existing and future transport networks including bus networks and their ability to accommodate the forecast number of trips to and from the development;
- Details of all daily and peak traffic and transport movements likely to be generated (light and heavy vehicle, public transport, pedestrian and cycle trips) and the type of heavy vehicles likely to be used (e.g. B-doubles) during the operation of the development, including a description of heavy vehicle access routes and the impacts of heavy vehicles on nearby intersections including James Ruse Drive/Hassall Street/Grand Avenue intersection;
- Details of access to the site from the road network including intersection location, design and sight distance (i.e. turning lanes, swept paths, sight distance requirements);
- An assessment of the existing and future performance of key intersections providing access to the site, and any upgrades (road/intersections) required as a result of the development. The assessment needs to be supported by appropriate modelling and analysis to the satisfaction of Transport for NSW;
- An assessment of predicted impacts on road safety and the capacity of the road network to accommodate the development;
- Plans of any road upgrades or new roads required to service the development, if necessary;

- An assessment of the cumulative impacts of traffic volumes from the proposal together with existing and approved developments in the area and potential conflict with traffic movements generated by existing uses;
- Demonstrate the measures to be implemented to encourage users of the development to make sustainable travel choices, including walking, cycling, public transport and car sharing;
- Details of sustainable travel initiatives for workers and visitors, particularly for the provision of end-of-trip facilities, pedestrian and cyclist facilities in secure, convenient, accessible areas close to main entrances, incorporating lighting and passive surveillance;
- Appropriate provision, design and location of on-site bicycle parking, and how bicycle provision will be integrated with the existing bicycle network;
- Details of the proposed number of car parking spaces and compliance with appropriate parking codes and justify the level of car parking provided on the site;
- Details of service vehicle movements and site access arrangements (including vehicle type and likely arrival and departure times of service vehicles);
- An assessment of proposed loading dock and servicing provisions and access arrangements to loading docks;
- Details of access and parking arrangements for emergency vehicles;
- Detailed plans of the proposed layout of the internal road network and parking provision on-site, in accordance with the relevant Australian Standards;
- Details of the likely dangerous goods to be transported on arterial and local roads to/from the site, if any, and the preparation of an incident management strategy, if relevant;
- Examine the heavy vehicle route to/from the site and how this may interact with the planned light rail route at Grand Avenue and if there will be any height clearance issue;
- Consult with Viva Energy who operate fuel terminal and is also the site's owner for details of any dangerous good operations on the surrounding road network; and
- In relation to construction traffic:
    - An assessment of cumulative impacts associated with other construction activities;
    - An assessment of road safety at key intersections;
    - Details of anticipated peak hour and daily truck movements to and from the site;
    - Details of access arrangements for workers to/from the site, emergency vehicles and service vehicle movements;
    - Details of temporary cycling and pedestrian access during construction;
    - Details of proposed construction vehicle access arrangements at all stages of construction; and
    - An assessment of traffic and transport impacts during construction and how these impacts will be mitigated for any associated traffic, pedestrians, cyclists and public transport operations, including the preparation of a draft Construction Traffic Management Plan to demonstrate the proposed management of impact. This Plan needs to include vehicle routes, number of trucks, hours of operation, access arrangements and traffic control measures for all demolition/construction activities.

Consultation

During the preparation of the EIS, the applicant you must consult with the following agencies:

- Transport for NSW;
- Parramatta Light Rail; and
- Sydney Metro.