



19 February 2021

Mr Sam Coles
ReDirect Recycling Pty Ltd
2 Wella Way
SOMERSY NSW 2250

EF21/1094
SEAR 1548

Via email: coless@borgs.com.au

Dear Mr Coles

**Resource Recovery Facility (Waste Management Facilities or Works)
33 Pile Road, Somersby (Lot 1 DP 1093201 and Lot 5 DP 1151970)
Planning Secretary's Environmental Assessment Requirements (SEAR) 1548**

Thank you for your request for the Planning Secretary's Environmental Assessment Requirements (SEARs) for the preparation of an Environmental Impact Statement (EIS) for the above development proposal. I have attached a copy of these requirements.

In support of your application, you indicated that your proposal is both designated and integrated development under Part 4 of the *Environmental Planning and Assessment Act 1979* and requires an approval under the *Protection of the Environment Operations Act 1997*. In preparing the SEARs, the Department of Planning, Industry and Environment (the Department) has consulted with the Environment Protection Authority.

The Department has also consulted with the Transport for NSW as required by Schedule 3 of State Environmental Planning Policy (Infrastructure) 2007. A copy of their requirements is attached.

If other integrated approvals are identified before the Development Application (DA) is lodged, you must undertake direct consultation with the relevant agencies, and address their requirements in the EIS.

If your proposal contains any actions that could have a significant impact on matters of National Environmental Significance, then it will require an additional approval under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). This approval is in addition to any approvals required under NSW legislation. If you have any questions about the application of the EPBC Act to your proposal, you should contact the Commonwealth Department of Agriculture, Water and the Environment on (02) 6274 1111.

Should you have any further enquiries, please contact Bianca Thornton, Planning and Assessment, at the Department on (02) 8217 2040 or at bianca.thornton@planning.nsw.gov.au.

Yours sincerely

Chris Ritchie
Director
Industry Assessments
as delegate of the Planning Secretary

Planning Secretary's Environmental Assessment Requirements

Section 4.12(8) of the *Environmental Planning and Assessment Act 1979*.
Schedule 3 of the *Environmental Planning and Assessment Regulation 2000*.

Designated Development

SEAR Number	1548
Proposal	Resource recovery facility with a processing capacity of 99,000 tonnes per annum of non-putrescible waste.
Location	33 Pile Road, Somersby (Lot 1 DP 1093201 and Lot 5 DP 1151970) in the Central Coast local government area
Applicant	ReDirect Recycling Pty Ltd
Date of Issue	19 February 2021
General Requirements	The Environmental Impact Statement (EIS) must meet the minimum form and content requirements in clauses 6 and 7 of Schedule 2 of the Environmental Planning and Assessment Regulation 2000.
Key Issues	<p>The EIS must include an assessment of all potential impacts of the proposed development on the existing environment (including cumulative impacts if necessary) and develop appropriate measures to avoid, minimise, mitigate and/or manage these potential impacts. As part of the EIS assessment, the following matters must also be addressed:</p> <ul style="list-style-type: none"> • strategic and statutory context – including: <ul style="list-style-type: none"> - a detailed justification for the proposal and suitability of the site for the development - a demonstration that the proposal is consistent with all relevant planning strategies, environmental planning instruments, development control plans (DCPs), or justification for any inconsistencies - a list of any approvals that must be obtained under any other Act or law before the development may lawfully be carried out. • suitability of the site – including: <ul style="list-style-type: none"> - a detailed justification that the site can accommodate the proposed processing capacity, having regard to the scope of the operations and its environmental impacts and relevant mitigation measures - floor plans depicting and proposed internal layout, including the location of machinery and equipment. • waste management – including: <ul style="list-style-type: none"> - details of the type, quantity and classification of waste to be received at the site - details of the resource outputs and any additional processes for residual waste - details of waste handling including transport, identification, receipt, stockpiling and quality control - the measures that would be implemented to ensure that the proposed development is consistent with the aims, objectives and guidelines in the <i>NSW Waste Avoidance and Resource Recovery Strategy 2014-21</i>. • hazards and risk – including:

- a preliminary risk screening completed in accordance with State Environmental Planning Policy No. 33 – Hazardous and Offensive Development and Applying SEPP 33 (DoP, 2011), with a clear indication of class, quantity and location of all dangerous goods and hazardous materials associated with the development. Should preliminary screening indicate that the project is "potentially hazardous" a Preliminary Hazard Analysis (PHA) must be prepared in accordance with Hazardous Industry Planning Advisory Paper No. 6 - Guidelines for Hazard Analysis (DoP, 2011) and Multi-Level Risk Assessment (DoP, 2011).
- **fire and incident management** – including:
 - an assessment of bushfire risks and asset protection zones (APZ) in accordance with NSW Rural Fire Service guidelines
 - technical information on the environmental protection equipment to be installed on the premises such as air, water and noise controls, spill clean-up equipment, fire management (including the location of fire hydrants and water flow rates at the hydrants) and containment measures
 - details of the size and volume of stockpiles and their arrangements to minimise fire spread and facilitate emergency vehicle access
 - the measures that would be implemented to ensure that the proposed development is consistent with the aims, objectives and guidelines in the NSW Fire and Rescue guideline *Fire Safety in Waste Facilities dated 27 February 2020*.
- **air quality** – including:
 - a description of all potential sources of air and odour emissions
 - an air quality impact assessment in accordance with relevant Environment Protection Authority guidelines
 - a description and appraisal of air quality impact mitigation and monitoring measures.
- **noise and vibration** – including:
 - a description of all potential noise and vibration sources during construction and operation, including road traffic noise
 - a noise and vibration assessment in accordance with the relevant Environment Protection Authority guidelines
 - a description and appraisal of noise and vibration mitigation and monitoring measures.
- **soil and water** – including:
 - a description of local soils, topography, drainage and landscapes
 - details of water usage for the proposal including existing and proposed water licencing requirements in accordance with the *Water Act 1912* and/or the *Water Management Act 2000*
 - an assessment of potential impacts on floodplain and stormwater management and any impact to flooding in the catchment
 - details of sediment and erosion controls
 - a detailed site water balance
 - an assessment in accordance with ASSMAC Guidelines for the presence and extent of acid sulfate soils (ASS) and potential acid sulfate soils (PASS) on the site and, where relevant, appropriate mitigation measures
 - an assessment of potential impacts on the quality and quantity of surface and groundwater resources
 - details of the proposed stormwater and wastewater management systems (including sewage), water monitoring program and other measures to mitigate surface and groundwater impacts
 - a description and appraisal of impact mitigation and monitoring measures.
- **traffic and transport** – including:
 - details of road transport routes and access to the site
 - road traffic predictions for the development during construction and operation

	<ul style="list-style-type: none"> - swept path diagrams depicting vehicles entering, exiting and manoeuvring throughout the site - an assessment of impacts to the safety and function of the road network and the details of any road upgrades required for the development. • biodiversity – including a description of any potential vegetation clearing needed to undertake the proposal and any impacts on flora and fauna. • heritage – including Aboriginal and non-Aboriginal cultural heritage.
Environmental Planning Instruments and other policies	<p>The EIS must assess the proposal against the relevant environmental planning instruments, including but not limited to:</p> <ul style="list-style-type: none"> • State Environmental Planning Policy (Infrastructure) 2007 • State Environmental Planning Policy No. 33 – Hazardous and Offensive Development • State Environmental Planning Policy No. 55 – Remediation of Land • Sydney Regional Environmental Plan No 20 – Hawkesbury-Nepean River • Gosford Local Environmental Plan 2014 • relevant development control plans and section 7.11 plans.
Guidelines	<p>During the preparation of the EIS you should consult the Department’s Register of Development Assessment Guidelines which is available on the Department’s website at https://www.planning.nsw.gov.au/Assess-and-Regulate/Development-Assessment/Industries. Whilst not exhaustive, this Register contains some of the guidelines, policies, and plans that must be taken into account in the environmental assessment of the proposed development.</p>
Consultation	<p>During the preparation of the EIS, you must consult the relevant local, State and Commonwealth government authorities, service providers and community groups, and address any issues they may raise in the EIS. In particular, you should consult with the:</p> <ul style="list-style-type: none"> • Department of Planning, Industry and Environment, specifically the: <ul style="list-style-type: none"> ○ Environment, Energy and Science Group ○ Environment Protection Authority • Heritage NSW • Transport for NSW • Fire & Rescue NSW • NSW Rural Fire Service • Central Coast Council • the surrounding landowners and occupiers that are likely to be impacted by the proposal. <p>Details of the consultation carried out and issues raised must be included in the EIS.</p>
Further consultation after 2 years	<p>If you do not lodge an application under Section 4.12(8) of the <i>Environmental Planning and Assessment Act 1979</i> within 2 years of the issue date of these SEARs, you must consult with the Planning Secretary in relation to any further requirements for lodgement.</p>



Department of Planning Industry and Environment
Industry Assessments
4 Parramatta Square, 12 Darcy Street
Parramatta, NSW, 2124

Attention: Bianca Thornton

Notice Number 1605344
Date 2 February 2021

RE: "Resource Recovery Facility – 33 Pile Road, Somersby – SEAR 1548"

I refer to your request to the Environment Protection Authority's (EPA) dated 25 January 2021, seeking the EPA's Secretary's Environmental Assessment Requirement (SEAR's) to assist with the preparation of an Environmental Impact Statement (EIS) for the proposal of a resource recovery facility at 33 Pile Road, Somersby.

The EPA has considered the proposal and provides the information in **Attachment A** it requires to properly assess the proposal. The EPA's key information requirements for the proposal include an adequate assessment of:

1. Potential noise impacts due to construction and operation;
2. Potential air quality impacts due to construction and operation;
3. Impacts on water quality and site wide water management; and
4. Waste management and disposal.

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

Please note that this response does not cover biodiversity or Aboriginal cultural heritage issues, which are the responsibility of the Office of Environment and Heritage.

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 any commitments made in the EIS may be formalised as approval conditions and may also be placed as formal licence conditions.

If you have any questions about this matter, please contact Rhys Acker on 02 4908 6858 or by email at RegOps.MetroRegulation@epa.nsw.gov.au



Yours sincerely

A handwritten signature in blue ink, appearing to be 'S. James', is located above the date.

2/2/2021

.....
Steven James

Unit Head

Regulatory Operations Metropolitan North

(by Delegation)



ATTACHMENT A: EIS REQUIREMENTS FOR

Resource Recovery Facility – 33 Pile Road, Somersby

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 document's executive summary should include a discussion of the proposed development, the key environmental risks, the identified mitigation measures, and an overall conclusion and justification for the proposal.

B The proposal

The proposed development must be adequately described and should clearly state and refer to:

- a) the type, the nature and size of the proposed development, including proposed average and maximum annual production rates that are expected to occur;
- b) the type, the nature and amount of the processes and the products to be used, including the plant and equipment proposed for use, fuel and chemicals required and proposed methods for their transportation, storage, use and their emergency management provisions, including relevant process flow diagrams;
- c) the by-products produced and/or wastes produced, including the fate of such products;
- d) the staging and timing of the proposal, including any construction works and any plans for potential future expansion plans and the proposed construction and operational hours, including and heavy vehicle movements;
- e) the anticipated benefits to relevant industry, community, etc; and
- f) the proposal's relationship to any other facility or industry both locally and abroad.

C The location

Provide an overview of the setting in which the proposed development is to take place in its local and regional environmental context including:

- a) the location of the proposed facility, its layout, including plant and equipment, and details of the surrounding environment, including land use zoning with appropriate maps/diagrams;
- b) the topography;
- c) meteorological data (e.g. temperature, wind (prevailing wind direction and strength), rainfall, evaporation, etc);
- d) surrounding land uses, including ownership details of any residence and/or land likely to be affected by the proposed facility with appropriate maps/diagrams;
- e) ecological information (vegetation, fauna, waters) with appropriate maps/diagrams; and
- f) availability of services and the accessibility of the site for passenger and freight transport.

D List of approvals and licences

Identify all approvals, licences or permits required to undertake the proposed development as well as those already obtained and those to be obtained.

E Identification and prioritisation of issues / scoping of impact assessment

Identify a scoping risk assessment methodology, undertake a risk assessment, and identify and prioritise key issues.

F The environmental issues

1. Noise

- Identify the existing noise environment (including any relevant noise assessment groupings) and identify applicable noise goals in line with relevant guidance/standards;
- Identify potential noise and vibration sources and impacts during both construction and operational stages and identify best practice mitigation measures (pollution control) and strategies to be incorporated for both stages to minimise noise and vibration emissions/impacts (with proposed timing), including validation monitoring, in line with relevant guidance/standards; and
- Propose representative noise monitoring locations for determining compliance with applicable noise goals and where relevant noise goals would be set as representative limits.

Note: this will require a detailed Noise Impact Assessment to be completed.

2. Air

- Identify the existing air quality environment and identify applicable air quality goals (i.e. ground level concentrations for pollutants and odour assessment criteria) in line with relevant guidance/standards; and
- Identify potential air quality and odour sources and impacts (including point source emissions from any site-based plant and equipment and/or fugitive dust or other emissions) during both construction and operational stages and identify best practice mitigation measures (pollution control) and strategies to minimise point and/or fugitive and/or odour emissions/impacts (with proposed timing), including monitoring, in line with relevant guidance/standards; and
- Include an emission inventory of all sources of air emissions.

Note: this will require a detailed Air Quality Impact Assessment to be completed.

3. Water

- Identify the condition of the local catchment and those immediate areas on and around the proposed development e.g. soils, erosion potential, vegetation cover, etc; and
- Identify nearby water resources, the background water conditions (including river flow data, water flow/direction and quality data, the depth to groundwater, groundwater flow/gradient and quality data, reliance on water resources by surrounding users and by the environment) and relevant water quality objectives in line with relevant guidance/standards; and
- Identify existing impacts to water resources (including other industrial discharges); and
- Identify any water intakes, intake frequency and volumes related to the proposed development; and
- Identify any expected discharges (including stormwater), discharge quality, discharge frequency and volumes related to the proposed development; and
- Identify all practical measures that can be taken to prevent any expected discharges or an explanation of why any specific discharges cannot be prevented; and
- Identify potential impacts to surface and groundwater during both construction and operational stages and identify best practice mitigation measures (pollution control) and strategies to protect surface and groundwater resources, particularly erosion and sediment controls during the construction stage and



the rehabilitation stage and the inclusion of permanent erosion and sediment controls where required and applicable; and

- Include a detailed water balance and discharge inventory; and
- Include an assessment of any mixing zones; and
- Include any proposed discharge limits.

Note: this will require a detailed Water Assessment to be completed.

4. Land

- Identify if the soils and groundwater in the area of the Proposal are contaminated or are acid forming (i.e. acid sulphate soils) and if so, identify best practice mitigation measures (pollution control) and strategies or remedial and/or disposal actions that will be required/undertaken if applicable in accordance with relevant guidance/standards. Investigations should be undertaken in accordance with (but not limited to) guidelines identified in Attachment B ; and
- Identify potential impacts to soils and groundwater /land resources as a result of the proposed development and identify best practice mitigation measures (pollution control) and strategies that will be required/undertaken if applicable in accordance with relevant guidance/standards.
- A site auditor accredited under the *Contaminated Land Management Act 1997* (CLM Act) should be engaged to provide a Section A site audit statement (SAS) and accompanying site audit report (SAR) certifying suitability of the land for the proposed land use. By engaging a site auditor to provide a Section A SAS, the site auditor will review the adequacy of the investigations, any remedial works or management plan required and confirm suitability of the land for the proposed use.

5. Waste

- Identify all waste types that will be generated as a result of the proposed development during both construction and operation, their classification and the ways in which they will be legally handled, stored, transported, reused, recycled or disposed of, including sampling/monitoring, record keeping, waste tracking, contingency measures and any other verification practices, in accordance with relevant guidance/standards; and

Identify options and strategies for waste minimisation; reuse and recycling across all activities and processes during both construction and operational stages.

6. Storage and use of fuels / chemicals etc

- Identify all fuels/chemicals/products/dangerous goods to be stored/used onsite; and
- Identify adequate handling, storage, control and usage requirements for any fuels/chemicals/products/dangerous to be stored/used onsite.

7. Incident Management

- Identify adequate incident management procedures to be established including notification requirements to the Appropriate Regulatory Authority and other relevant authorities for incidents that cause or have the potential to cause material harm to the environment (Part 5.7 of the *Protection of the Environment Operations Act 1997*).

8. 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; and
- Identify the cumulative impacts of the proposed development in a local context.

9. Monitoring Programs

- Include a detailed proposal of any noise, air, water, land, waste, meteorological etc monitoring during construction and operation to ensure and assumptions, predictions, goals, criteria etc are achieved. The proposal should include a detailed description of the monitoring locations, sample analysis methods and the level of reporting proposed.

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).
- Include any Statement of Commitments to be made by the Proponent.

H. Justification for the proposed development and conclusion

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

Attachment B - EPA's Guidance Material (not exhaustive)

Legislation	
Environmental Planning and Assessment Act 1979	http://www.legislation.nsw.gov.au/maintop/view/inforce/act+203+1979+cd+0+N
Protection of the Environment Operations Act 1997	http://www.legislation.nsw.gov.au/maintop/view/inforce/act+156+1997+cd+0+N
Protection of the Environment Operations(Noise Control) Regulation 2017	https://legislation.nsw.gov.au/#/view/regulation/2017/449
Protection of the Environment Operations(Clean Air) Regulation 2010	https://legislation.nsw.gov.au/#/view/regulation/2010/428
Protection of the Environment Operations(Waste) Regulation 2014	https://legislation.nsw.gov.au/#/view/regulation/2014/666

Waste Avoidance and Resource Recovery Act 2001	https://legislation.nsw.gov.au/#/view/act/2001/58
Contaminated Land Management Act 1997	http://www.legislation.nsw.gov.au/#/view/act/1997/140
<u>Licensing</u>	
Licensing Requirements	https://www.epa.nsw.gov.au/licensing-and-regulation/licensing
<u>Noise/Vibration</u>	
Interim Construction Noise Guideline (DECC, 2009)	https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/interim-construction-noise-guideline
Assessing Vibration: a technical guideline (DEC, 2006)	https://www.epa.nsw.gov.au/your-environment/noise/industrial-noise/assessing-vibration
Noise Policy for Industry (2017) and Implementation and Transitional arrangements for the Noise Policy for Industry (2017)	https://www.epa.nsw.gov.au/publications/noise/17p0524-noise-policy-for-industry https://www.epa.nsw.gov.au/publications/noise/17p0293-implementation-transition-arrange-noise-pol-industry
NSW Road Noise Policy (DECCW, 2011)	http://www.epa.nsw.gov.au/resources/noise/2011236nswroadnoisepolicy.pdf
<u>Air/Odour</u>	
Approved methods for the Modelling and Assessment of Air Pollutants in NSW (2016)	http://www.epa.nsw.gov.au/resources/epa/approved-methods-for-modelling-and-assessment-of-air-pollutants-in-NSW-160666.pdf
Approved methods for the Sampling and Analysis of Air Pollutants in NSW (2007)	http://www.epa.nsw.gov.au/resources/air/07001amsaap.pdf
National Environment Protection (Ambient Air Quality) Measure	http://www.nepc.gov.au/nepms/ambient-air-quality
No EPA specific guidance material exists for the control of dust from construction sites. Consideration should be given to the POEO Act and the Local Government Air Quality Toolkit (DECC, 2007)	http://www.epa.nsw.gov.au/air/lgaqt.htm
Technical Framework - Assessment and Management of Odour from	http://www.epa.nsw.gov.au/air/odour.htm http://www.epa.nsw.gov.au/air/odour.htm

Stationary Sources in NSW (DEC, 2006) and Technical Notes - Assessment and Management of Odour from Stationary Sources in NSW (DEC, 2006)	
Water/Soils	
ANZECC Guidelines for Fresh and Marine Water Quality (2018)	https://www.waterquality.gov.au/guidelines/anz-fresh-marine
NSW Water Quality and River Flow Objectives	http://www.environment.nsw.gov.au/ieo/index.htm
Applying Goals for Ambient Water Quality Guidance for Operations Officers – Mixing Zones	http://deccnet/water/resources/AWQGuidance7.pdf
Approved Methods for the Sampling and Analysis of Water Pollutant in NSW (2004)	https://www.epa.nsw.gov.au/-/media/epa/corporate-site/resources/water/approvedmethods-water.pdf
Soil and Landscape Issues in Environmental Impact Assessment (DLWC 2000)	https://www.shop.nsw.gov.au/publication/soil-and-landscape-issues-in-environmental-impact-assessment-technical-report-no-34-1324-686-0-839
Managing urban stormwater: soils and construction, vol. 1 (Landcom, 2004) and Addendum Publications (Various)	http://www.environment.nsw.gov.au/stormwater/publications.htm
Landslide Risk Management (2007)	http://www.australiangeomechanics.org/resources/downloads/
Site Investigations for Urban Salinity (DLWC, 2002)	http://www.environment.nsw.gov.au/resources/salinity/booklet3siteinvestigationsforurbansalinity.pdf
Dryland Salinity Resources (Various)	http://www.environment.nsw.gov.au/salinity/solutions/urban.htm
Contaminated Sites Assessment and Remediation	
Contaminated Land – EPA website	https://www.epa.nsw.gov.au/your-environment/contaminated-land
Managing land Contamination: Planning Guidelines – SEPP 55 Remediation of Land	http://www.epa.nsw.gov.au/clm/planning.htm
Guidelines for the NSW Site Auditor Scheme – 3rd	https://www.epa.nsw.gov.au/publications/contaminatedland/17p0269-guidelines-for-the-nsw-site-auditor-scheme-third-edition

Edition (EPA, 2017)	
Consultants reporting on contaminated land, Contaminated Land Guidelines (EPA,2020)	https://www.epa.nsw.gov.au/-/media/epa/corporate-site/resources/contaminated-land/20p2233-consultants-reporting-on-contaminated-land-guidelines.pdf?la=en&hash=EBB6758A2DE448534B6FDD5057D280523E423CC7
Sampling Design Guidelines (EPA, 1995)	http://www.epa.nsw.gov.au/resources/clm/95059sampgdline.pdf
National Environment Protection (Assessment of Site Contamination) Measure	http://www.nepc.gov.au/nepms/assessment-site-contamination
Waste	
NSW Waste Avoidance and Resource Recovery Strategy 2014-2021	http://www.epa.nsw.gov.au/wastestrategy/warr.htm
Waste Classification Guidelines – 4 Parts (EPA, 2014)	http://www.epa.nsw.gov.au/wasteregulation/classify-waste.htm
Chemical and Fuel Storage	
Storage and Handling of Dangerous Goods – Code of Practice (WorkCover, 2005)	http://www.safework.nsw.gov.au/__data/assets/pdf_file/0005/50729/storage-handling-dangerous-goods-1354.pdf



4 February 2021

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

Attention: Bianca Thornton

SEARS REQUEST – SEAR-1548 – PROPOSED RESOURCE RECOVERY FACILITY, 33 PILE ROAD SOMERSBY (LOT: 1 DP: 1093201, LOT: 5 DP: 1151970)

Transport for NSW (TfNSW) advises that legislation to dissolve Roads and Maritime Services and transfer its assets, rights and liabilities to TfNSW came into effect on 1 December 2019. It is intended that the new structure will enable TfNSW to deliver more integrated transport services across modes and better outcomes to customers and communities across NSW.

For convenience, correspondence, advice or submissions made to or by Roads and Maritime Services prior to its dissolution, are referred to in this letter as having been made to or by 'TfNSW'.

On 25 January 2021 TfNSW accepted the referral by the Department of Planning, Industry and Environment (DPIE) via email regarding the abovementioned application. DPIE referred the application to TfNSW for comment. This letter is a submission in response to that referral.

TfNSW's primary interests are in the road network, traffic and broader transport issues. In particular, the efficiency and safety of the classified road network, the security of property assets and the integration of land use and transport.

TfNSW have reviewed the Scoping Report prepared by Jackson Environment and Planning Pty Ltd dated 18 January 2021. It is understood that the proposal is for a Resource Recovery Facility, within a previously approved warehouse building (DA56372/2019), with a proposed maximum processing capacity of 99,000 tonnes per annum.

TfNSW response & requirements

TfNSW recommends that the Environmental Impact Statement (EIS) should refer to the following guidelines with regard to the traffic and transport impacts of the proposed development:

- Road and Related Facilities within the Department of Planning EIS Guidelines,

- Section 2 Traffic Impact Studies of Roads and Maritime's NSW's *Guide to Traffic Generating Developments 2002*, and
- Austroads Guide to Traffic Management, Part 12, Integrated Transport Assessments for Developments.

Furthermore, a traffic and transport study shall be prepared in accordance with the Roads and Maritime Services NSW's *Guide to Traffic Generating Developments 2002* and is to include (but not be limited to) the following:

- Review of historical development consents associated with the current (approved) operations.
- Comparison of current (approved) and proposed operations to determine change in traffic generation and distribution, and the associated impact on the road network.
- Details of all traffic types and volumes likely to be generated by the proposal during construction, operation and rehabilitation, including description of heavy vehicle types, and haul route origins and destinations.
- Details of daily inbound and outbound traffic profile by time of day and day of week broken down per vehicle types.
- An assessment of all relevant vehicular traffic routes and intersections for access to / from the site.
- If required, identification of any dangerous goods likely to be transported on the classified and local roads to/ from the site and, if necessary, the preparation of an incident management strategy.
- The distribution on the road network of the trips generated by the proposed development. It is requested that the predicted traffic flows are shown diagrammatically to a level of detail sufficient for easy interpretation.
- Traffic analysis of all major / relevant intersections impacted, including but not limited to the Pacific Highway and Pile Road intersection, using SIDRA or similar traffic model. The analysis to include:
 - Current traffic counts and 10-year traffic growth projections
 - Traffic generation and distribution during construction and operational stages
 - With and without development scenarios
 - Delays, level of service, 95th percentile back of queue lengths and midblock capacity on all legs of intersections
 - Electronic modelling data for Transport for NSW review.
- An assessment of cumulative study area traffic impacts associated with the proposal and any other proposed/approved developments in the area.

- Details of access to, from and within the site from the surrounding road network. It should be demonstrated that the site plan, site access and surrounding road network can accommodate the largest vehicle entering, exiting and maneuvering throughout the site.
- An assessment of affected intersections on both the local and classified road network. The assessment to include review of road safety, crash data analysis, sight distance, swept paths, pavement lifespan and design compliance to current Austroads and TfNSW supplements for the largest vehicle anticipated to access the site.
- Identify the necessary road network infrastructure upgrades that are required to maintain existing levels of service on both the local and classified road network for the development. In this regard, preliminary concept drawings shall be submitted with the EIS for any identified road infrastructure upgrades. It should be noted that any identified road infrastructure upgrades will need to be to the satisfaction of TfNSW and Council.
- Any other impacts on the regional and state road network including consideration of pedestrian, cyclist and public transport facilities and provision for service vehicles.

On determination of this matter, please forward a copy to TfNSW for record and / or action purposes. Should you require further information please contact Dipen Nathwani, Development Services Case Officer, on 0418 514 166 or by emailing development.hunter@rms.nsw.gov.au.

Yours sincerely



Peter Marler
A/Manager
Development Services North