

## Memo

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**To** David Pattison, Senior Manager Project Services North

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**From** Ross Gersekowski, Project Contract Manager

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**Priority** URGENT

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**Date** 31/10/2022

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**Subject** Addendum assessment and decision for proposed modification to Mallanganeë – Willock St MWREF

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### Proposed modification

Modification to the seg. 5390 5400 Mallanganeë NP – Willock Street MWREF.

### Background

Modification to the seg. 5390 5400 Mallanganeë NP – Willock Street MWREF is required to accommodate an additional three (3) trees identified for removal. The three trees were included in the environmental assessment but not identified for removal. A subsequent inspection by construction staff confirmed the trees are within the construction footprint and will have to be removed.

### Purpose

The purpose of this memo is to:

- Describe the proposed modification
- Document and assess the likely impacts of the proposed modification on the environment
- Detail protective measures to be implemented
- Document the recommendation of the Transport Manager Environment & Sustainability and the decision by the Transport delegated manager whether or not to determine the modification to the project.

This memo is an addendum to and is to be read in conjunction with the approved Minor Works REF Mallanganeë NP – Willock St ,dated 12 October 2022.

### Description of proposed modification

The proposed modification is to remove a further three (3) mature Grey Gum (*Eucalyptus moluccana*) eucalypt

trees in addition to the originally assessed ten (10) trees as per Figure 1a,b,c and Figure 2. Trees have been inventory numbered for scope control and to coincide with the calculations required for determining the amount to be transferred for the Biodiversity Conservation fund. Additional trees are numbered 8, 9 and 10 from the inventory register.



Figure 1a



Figure 1b



Figure 1c

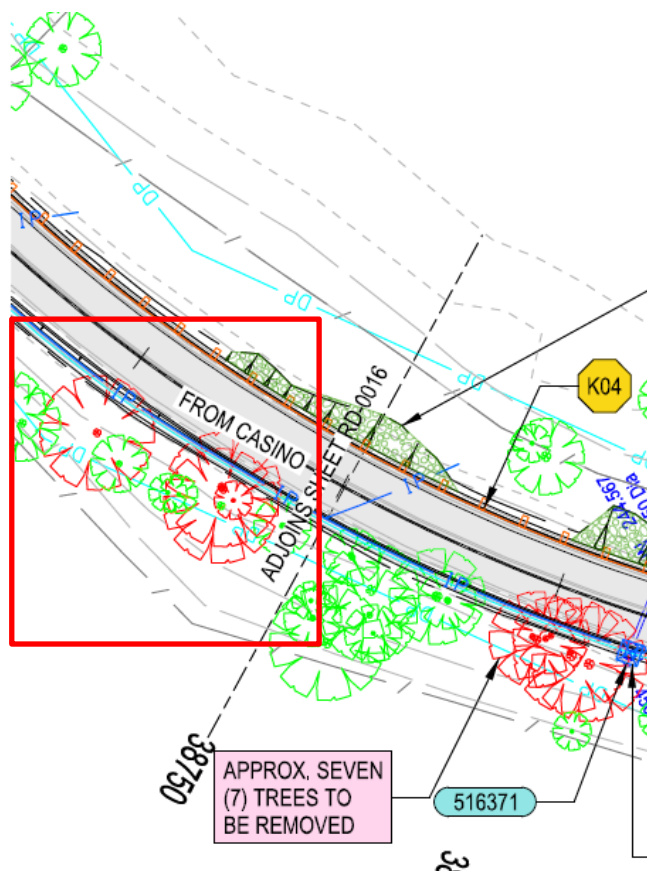


Figure 2

### Need for the proposed modification

During a site inspection it was recommended that three (3) additional trees required removal to construct the design and for future ongoing stability reasons (significant root disturbance).

## Options considered

The options considered for the proposed modification included:

### **Option 1- Do Nothing**

This option does nothing to address the change proposal to remove the trees for safety and constructability reasons.

### **Option 2 – Revise the design to avoid the tree removal**

This option is to modify the design to avoid the tree removal. Options including shifting the alignment, adjusting the batters, shoulder and verge widths were investigated however are already at minimum or tolerable widths and slopes.

### **Option 3 – Remove the trees**

Removal of the trees is necessary as the design cannot be modified. Removal of the trees is the safest option as it eliminates risks with trees becoming unstable during construction and operationally as a risk to road users.

### **Option 3 is the preferred option**

## Impact assessment

Attachment A addresses the environmental factors specified in section 171 of the Environmental Planning and Assessment Regulation 2021.

### **Soil**

No additional impacts are likely to occur as a result of the proposed works.

### **Waterways and water quality**

No additional impacts are likely to occur as a result of the proposed works.

### **Noise and vibration**

No additional impacts are likely to occur as a result of the proposed works.

### **Air quality**

No additional impacts are likely to occur as a result of the proposed works.

### **Aboriginal heritage**

No additional impacts are likely to occur as a result of the proposed works.

### **Non-Aboriginal heritage**

No additional impacts are likely to occur as a result of the proposed works.

## **Biodiversity**

The Biodiversity Assessment Report prepared by Ecologists RECONECO assessed all trees through the road corridor in this section for potential removal. Whilst generally there are impacts to biodiversity values as a result of tree removal, there is no significant impact to overall threatened species, populations and ecological communities as a result of the removal of the three (3) additional trees.

## **Traffic and transport**

No additional impacts are likely to occur as a result of the proposed works.

## **Socio-economic issues**

No additional impacts are likely to occur as a result of the proposed works.

## **Landscape character and visual impacts**

No additional impacts are likely to occur as a result of the proposed works.

## **Waste**

Additional waste will be generated from the tree removal, trees are proposed to be mulched and trunks unable to be mulched disposed off-site at registered facilities. Waste management plan to be updated to reflect change in volume and area to receive waste as relevant.

## **Cumulative impacts**

No additional impacts are likely to occur as a result of the proposed works.

## Summary of additional or revised safeguards

A summary of additional or revised safeguards are included in the table below. A complete list of safeguards as amended is provided in Attachment B.

Safeguards	
Soil	No additional safeguards
Waterways and water quality	No additional safeguards
Noise and vibration	No additional safeguards
Air quality	No additional safeguards
Non-Aboriginal heritage	No additional safeguards
Aboriginal heritage	No additional safeguards
Biodiversity	Ensure the additional trees are included in calculations for the contribution funding to the Biodiversity Conservation Fund.
Trees	Ensure additional trees are clearly marked and delineated prior to commencement.
Traffic and transport	No additional safeguards
Socio-economic	No additional safeguards
Landscape character and visual amenity	No additional safeguards
Waste	Consider impacts from additional tree stumps not able to be tub mulched.
Cumulative impacts	No additional safeguards

## Licences, permits or approvals

All relevant licenses, permits, notifications and approvals needed for the Mallangane Range – Willocks St project and when they need to be obtained are listed in the MWREF – Mallangane Range – Willocks St final. There are no changes to these requirements.

## Conclusion

All relevant safeguards identified in the MWREF – HW16 Mallangane Range – Willocks St would be applied to this work. No additional or revised safeguards are required.

Division 5.1 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) applies to the proposed modification. The proposed modification has been reviewed in the context of the MWREF and considered against the requirements of sections 5.5 and 5.7 of the EP&A Act.

In considering the proposed modification this assessment has examined and taken into account to the fullest extent possible, all matters affecting or likely to affect the environment by reason of that activity as addressed in this memo, and associated information. This assessment is considered to be in accordance with the factors

specified in section 171 of the *Environmental Planning and Assessment Regulation 2021*.

The Mallanganee Range – Willocks St project including the proposed modification described in this memo will have some minor additional environmental impacts which can be ameliorated satisfactorily. Having regard to the safeguards and management measures proposed, it is considered that the expected environmental impacts are unlikely to be significant and an environmental impact statement is not required under Division 5.2 of the EP&A Act.

The assessment has considered the potential impacts of the activity on the biodiversity values listed under the *Biodiversity Conservation Act 2016* and the *Fisheries Management Act 1994*.

The MWREF including the proposed modification described in this memo will not significantly affect biodiversity values listed under the *Biodiversity Conservation Act 2016*. Therefore, the concurrence of the Coordinator General of the Environment, Energy and Science Group (EES) of Department of Planning and Environment and a species impact statement or a Biodiversity Development Assessment Report (BDAR) is not required.

In addition to the above, the assessment considered the effect of the activity on:

- Conservation agreements under the *National Parks and Wildlife Act 1974*.
- Plans of management under the *National Parks and Wildlife Act 1974*.
- Biodiversity stewardship sites under the *Biodiversity Conservation Act 2016*.
- Wilderness areas under the *Wilderness Act 1987*.

The assessment has also addressed the potential impacts of the activity on matters of national environmental significance and any impacts on the environment of Commonwealth land and concluded that there will be no significant impacts. Therefore, there is no need for a referral to be made to the Australian Government Department of Agriculture, Water and the Environment for a decision by the Australian Minister for the Environment on whether assessment and approval is required under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) or for application of the EPBC Act strategic assessment for Transport activities assessed under Part 5 of the EPBC Act.

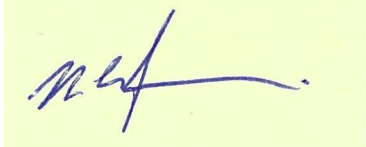
This memo is considered to be of adequate quality and meets all relevant requirements.

The proposed modification has been characterised in the context of the Mallanganee Range – Willocks Street project and is considered to be consistent with that project's objectives and key features. While the proposed modification would increase the overall environmental impacts of the determined project, it is substantially the same as the activity described and assessed in the determined REF and does not constitute an entirely new activity.

## Certification

This memo provides a true and fair description of the scope and potential impacts of the proposal to modify the Mallanganee Range – Willocks St MWREF.

Prepared by:



Ross Gersekowski  
Project Contract Manager

## Recommendation

It is recommended that the proposal to modify the Mallanganee Range – Willocks Street MWREF to include the removal of additional three trees as described in this memo proceed subject to the implementation of all safeguards and management measures identified in this memo and in the MWREF – HW16 Mallanganee Range – Willocks St and compliance with all other relevant statutory approvals, licences, permits and authorisations. Consideration of this proposed modification has examined and taken into account, to the fullest extent possible, all matters likely to affect the environment by reason of the activity and established that the activity is not likely to significantly affect the environment. The memo has concluded that there will be no significant impacts on matters of national environmental significance or the environment of Commonwealth land.

Recommended by:



Lester Piggott  
A/ Environment and Sustainability Manager

## Determination

Determined by:



David Pattison  
Senior Manager Project Services North  
Date: 10/11/2022

## Appendices

Appendix A – Section 171 EP&A Regulation checklist

Appendix B - Complete list of safeguards

Appendix C – HW16 Bruxner Highway S5390-5400 Mallangane Range – Willocks Street MWREF

Please return this paperwork to: **Ross Gersekowski**



# Appendix A: Environmental Planning and Assessment Regulation 2021 checklist

The following factors, listed in section 171(2) of the Environmental Planning and Assessment Regulation 2021, have been considered to assess the likely impacts of the proposal on the natural and built environment. This consideration is required to comply with sections 5.5 and 5.7 of the EP&A Act.

Environmental factor	Impact
<p>(a) <b>Any environmental impact on a community?</b></p> <p>The proposed work may cause minor short-term environmental impacts on the community, such as delays to traffic and noise impacts on residents, however the potential impacts would be minimised with the implementation of the safeguards as detailed in this addendum memo. The maintenance works would have no environmental impact on a community in the long-term and road users would benefit from safer travelling conditions.</p>	N/A
<p>(b) <b>Any transformation of a locality?</b></p> <p>The proposed work would not transform the locality, as works would generally be contained within the existing road formation and be carried out on existing Transport assets.</p>	N/A
<p>(c) <b>Any environmental impact on the ecosystems of a locality?</b></p> <p>The proposal would have potential environmental impacts on the ecosystems of a locality, however the potential impacts would be minimised with the implementation of the safeguards in attachment B of this addendum memo.</p>	Minimal impacts previously assessed in REF
<p>(d) <b>Any reduction of the aesthetic, recreational, scientific or other environmental quality or value of a locality?</b></p> <p>The proposal would not reduce the aesthetic, recreational, scientific or other environmental quality or value of the locality, as works would generally be contained with the existing road formation.</p>	N/A
<p>(e) <b>Any effect on a locality, place or building having aesthetic, anthropological, archaeological, architectural, cultural, historical, scientific or social significance or other special value for present or future generations?</b></p> <p>The proposal would potentially have an effect on a locality, place or building of significance or other special value for present or future generations, however the effect would be minimal due to the limited scope of works for the maintenance activities covered in this addendum memo, and the potential impacts would be minimised with the implementation of the safeguards given in attachment B of this addendum memo.</p>	N/A
<p>(f) <b>Any impact on habitat of any protected animals (within the meaning of the Biodiversity Conservation Act 2016)?</b></p> <p>The proposal would not have any impact on the habitat of any protected animals due to the limited scope of works for the proposed activities and the implementation of the safeguards given in attachment B of this addendum memo.</p>	N/A
<p>(g) <b>Any endangering of any species of animal, plant or other form of life, whether living on land, in water or in the air?</b></p>	N/A

	The proposal would not endanger any species of animal, plant or other form of life, whether living on land, in water or in the air due to the limited scope of works for the proposed activities and the implementation of the safeguards given in attachment B of this addendum memo.	
(h)	<p><b>Any long-term effects on the environment?</b></p> <p>The proposal would have positive long-term effects on the environment due to improved safety for road users. There are no anticipated negative long-term effects on the environment from the maintenance works due to the limited scope of these works and the implementation of the safeguards given in attachment B of this addendum memo.</p>	N/A
(i)	<p><b>Any degradation of the quality of the environment?</b></p> <p>The proposal would potentially degrade the quality of the environment in the short-term, however the potential impacts would be minimised with the implementation of the safeguards given in attachment B of this addendum memo.</p>	N/A
(j)	<p><b>Any risk to the safety of the environment?</b></p> <p>The proposal would have minimal risk to the safety of the environment due to the limited scope of works for the maintenance activities covered in this addendum memo, and the potential impacts would be minimised with the implementation of the safeguards given in attachment B of this addendum memo.</p>	No more than previously assessed in the REF
(k)	<p><b>Any reduction in the range of beneficial uses of the environment?</b></p> <p>The proposal would cause a minor reduction in the use of the road from lane closures, which would potentially increase travelling time for road users in the short-term. There would be no long-term reduction in the range of beneficial uses of the environment as a result of the maintenance works.</p>	N/A
(l)	<p><b>Any pollution of the environment?</b></p> <p>The proposal would potentially cause pollution of the environment, however the potential impacts would be minimised with the implementation of the safeguards given in attachment B of this addendum memo.</p>	N/A
(m)	<p><b>Any environmental problems associated with the disposal of waste?</b></p> <p>The waste generated during the proposal would be contained and removed for disposal to approved recycling facilities or to licensed landfill in accordance with the safeguards in attachment B of this addendum memo. No environmental problems are anticipated for the disposal of waste.</p>	None that wasn't previously assessed in the REF.
(n)	<p><b>Any increased demands on resources, natural or otherwise which are, or are likely to become, in short supply?</b></p> <p>The proposal would not significantly increase demands on resources, which are, or are likely to become, in short supply. Relatively small amounts of materials would be required for the proposed work. The safeguards listed in attachment B of this addendum memo would be implemented to minimise any impacts.</p>	N/A
(o)	<p><b>Any cumulative environmental effect with other existing or likely future activities?</b></p> <p>The proposal has the potential to have cumulative environmental effects with other existing or likely future activities, however the effects would be minimal due to the limited scope of works for the activities covered in this addendum memo,</p>	N/A

	and the potential impacts on the environment would be minimized with the implementation of the safeguards given in attachment B of this addendum memo.	
(p)	<p><b>Any impact on coastal processes and coastal hazards, including those under projected climate change conditions?</b></p> <p>Refer to any safeguards proposed to minimize impacts.</p>	N/A
(q)	<p><b>Any impact on applicable local strategic planning statements, regional strategic plans or district strategic plans made under the Act, Division 3.1?</b></p> <p>NIL.</p>	N/A
(r)	<p><b>Any impact on other relevant environmental factors?</b></p> <p>In considering the potential impacts of this proposal all relevant environmental factors have been considered, refer to impact assessment section of this addendum memo.</p>	N/A

# Appendix B: Environmental Planning and Assessment Regulation 2021 checklist

Environmental safeguards for the Mallanganee Range – Willocks St are listed below. Additional safeguards identified in this addendum minor works REF memo are included in bold and italicised font. The safeguards will be incorporated into the CEMP and implemented during construction and operation of the proposed modification, should it proceed. These safeguards will minimise potential adverse impacts arising from the proposed works on the surrounding environment.

Safeguards for the proposed work	
Soil	<p><b>E1.</b> Erosion and sediment control measures are to be implemented and maintained to:</p> <ul style="list-style-type: none"> <li>• Prevent sediment moving off-site and sediment laden water entering any water course, drainage lines, or drain inlets.</li> <li>• Reduce water velocity and capture sediment on site.</li> <li>• Minimise the amount of material transported from site to surrounding pavement surfaces.</li> <li>• Divert clean water around the site (in accordance with the Landcom/Department of Housing Managing Urban Stormwater, Soils and Construction Guidelines (the Blue Book)).</li> </ul> <p><b>E2.</b> Erosion and sedimentation controls are to be checked and maintained on a regular basis (including clearing of sediment from behind barriers) and records kept and provided on request.</p> <p><b>E3.</b> Erosion and sediment control measures are not to be removed until the works are complete, and areas are stabilised.</p> <p><b>E4.</b> Work areas are to be stabilised progressively during the works.</p> <p><b>E5.</b> A progressive erosion and sediment control plan is to be prepared for the works.</p> <p><b>E6.</b> The maintenance of established stockpile sites is to be in accordance with the Transport for NSW Stockpile Site Management Guideline (EMS-TG-10).</p>
Waterways and water quality	<p><b>W1.</b> There is to be no release of dirty water into drainage lines and/or waterways.</p> <p><b>W2.</b> Water quality control measures are to be used to prevent any materials (e.g., concrete, grout, sediment etc) entering drain inlets or waterways.</p> <p><b>W3.</b> Excess debris from cleaning and washing is removed using hand tools.</p> <p><b>W4.</b> All fuels, chemicals and liquids are to be stored in an impervious bunded area a minimum of 50 metres away from:</p> <ul style="list-style-type: none"> <li>• <b>Rivers, creeks or any areas of concentrated water flow</b></li> <li>• <b>Flooded or poorly drained areas</b></li> <li>• <b>Slopes above 10%.</b></li> </ul> <p><b>W5.</b> Refuelling of plant and equipment is to occur in impervious bunded areas located a minimum of 50 metres from drainage lines or waterways.</p> <p><b>W6.</b> An emergency spill kit is to be kept on site at all times and maintained throughout the construction work. The spill kit must be appropriately sized for the volume of substances at the work site.</p> <p><b>W7.</b> All workers will be advised of the location of the spill kit and trained in its use.</p>

## Safeguards for the proposed work

	<p><b>W8.</b> If an incident (e.g. spill) occurs, the Transport for NSW Environmental Incident Classification and Reporting Procedure is to be followed and the Transport for NSW Contract Manager notified as soon as practicable.</p> <p><b>W9.</b> Visual monitoring of local water quality (i.e. turbidity, hydrocarbon spills/slicks) is to be undertaken on a regular basis to identify any potential spills or deficient silt curtains or erosion and sediment controls.</p> <p><b>W10.</b> Timing the works should consider risk of flooding events which are more likely in the wet season which for the area is from December – March. Works undertaken during this period should monitor forecast rainfall and plan for the occurrence of flooding events which may impact construction works.</p>
Noise and vibration	<p><b>N1.</b> Works to be carried out during normal work hours (i.e., 7am to 6pm Monday to Friday) except for Saturdays where hours will be 8am to 6pm. Any work that is performed outside normal work hours or on Sundays or public holidays must have measures in place to minimise noise impacts.</p> <p><b>N2.</b> Noise impacts are to be minimised in accordance with Transport for NSW Construction Noise Estimator.</p> <p><b>N3.</b> Letter box drops are to be completed to all residents located less than 115 metres from the works. All noise complaints will be addressed if/when received with respite options provided on a case-by-case basis.</p> <p><b>N4.</b> Implement measures, including allowing adequate distance that rollers and other vibration producing equipment can come to adjacent buildings and/or using non-vibration producing equipment, to minimise or prevent vibration impacts.</p> <p><b>N5.</b> Condition surveys shall be carried out before and after the project to nine (9) identified properties and their outbuildings and/or other improvements, assessed as being at risk for potential damage as a result of ground vibration.</p>
Air quality	<p><b>A1.</b> Measures (including watering or covering exposed areas) are to be used to minimise or prevent air pollution and dust.</p> <p><b>A2.</b> Works (including the spraying of paint and other materials) are not to be carried out during strong winds or in weather conditions where high levels of dust or air borne particulates are likely.</p> <p><b>A3.</b> Vegetation or other materials are not to be burnt on site.</p> <p><b>A4.</b> Vehicles and vessels transporting waste or other materials that may produce odours or dust are to be covered during transportation.</p> <p><b>A5.</b> Stockpiles or areas that may generate dust are to be managed to suppress dust emissions in accordance with the Transport for NSW Stockpile Site Management Guideline (EMS-TG-10).</p>
Non-Aboriginal heritage	<p>If unexpected heritage items are uncovered during the works, all works must cease in the vicinity of the material/find and the steps in the Transport for NSW <i>Standard Management Procedure: Unexpected Heritage Items</i> must be followed. Transport for NSW Senior Environment Specialist – Heritage must be contacted immediately.</p>
Aboriginal heritage	<p>If Aboriginal heritage items are uncovered during the works, all works in the vicinity of the find must cease and the Transport for NSW Aboriginal cultural</p>

## Safeguards for the proposed work

	<p>heritage officer and regional environment manager contacted immediately. Steps in the Transport for NSW <i>Standard Management Procedure: Unexpected Heritage Items</i> must be followed.</p>
Biodiversity	<p><b>F1.</b> There is to be no disturbance or damage to threatened species or areas of outstanding value.</p> <p><b>F2.</b> Works are not to harm threatened fauna (including where they inhabit bridges or other structures e.g. timber fence posts).</p> <p><b>F3.</b> Pre-clearing surveys will be undertaken in accordance with <i>Guide 1: Pre-clearing process</i> of the <i>Biodiversity Guidelines: Protecting and managing biodiversity on RTA projects</i> (RTA 2011).</p> <p><b>F4.</b> An arborist should be used to remove sections of tree hollows manually to minimise potential impacts to species occupying the trees. Hollow sections should be lowered to the ground in controlled manner and inspected as part of the clearing process. Any animals present should be released under supervision of an ecologist or wildlife carer.</p> <p><b>F5.</b> If unexpected threatened fauna or flora species are discovered, stop works immediately and follow the Transport for NSW Unexpected Threatened Species Find Procedure in the Transport for NSW Biodiversity Guidelines 2011 – Guide 1 (Pre-clearing process).</p> <p><b>F6.</b> Tree and hollows that require replacement will be identified in accordance with the Tree and Hollow replacement guideline. Where trees and hollows will be replaced within the project boundary prepare a Tree and Hollow Replacement Plan to address the impacts described prior to the commencement of works. Alternatively, where tree and hollow replacement cannot be accommodated locally or can only be partially accommodated, payment must be made to the TfNSW Conservation Fund prior to the commencement of works in accordance with the Tree and Hollow Replacement Guideline”.</p> <p><b>F7.</b> All pathogens are to be managed in accordance with the Transport for NSW Biodiversity Guidelines - Guide 7 (Pathogen Management), DECC Statement of Intent 1: Infection of native plants by <i>Phytophthora cinnamomi</i> (for <i>Phytophthora</i>) and Arrive Clean, Leave Clean, Commonwealth of Australia 2015.</p> <p><b>F8.</b> Weeds are to be managed according to requirements under the Biosecurity Act, 2015 and Guide 6 (Weed Management) of the Transport for NSW Biodiversity Guidelines 2011.</p> <p><b>F9.</b> Fauna handling must be carried out in accordance with the requirements the Transport for NSW Biodiversity Guidelines - Guide 9 (Fauna Handling).</p> <p><b>F10.</b> Works are not to create an ongoing barrier to the movement of wildlife.</p>
Trees	<p><b>T1.</b> Pruning of mature trees is to be in accordance with Part 5 of the Australian Standard 4373-2007 Pruning of amenity trees.</p> <p><b>T2.</b> Work limits are to be clearly delineated in the field prior to commencement.</p> <p><b>T3.</b> There is to be no disturbance beyond the limit of works without prior assessment.</p>

## Safeguards for the proposed work

Traffic and transport	<p><b>R1.</b> Where possible, current traffic movements and property accesses are to be maintained during the works. Any disturbance is to be minimised to prevent unnecessary traffic delays.</p> <p><b>R2.</b> A traffic control plan will be prepared in accordance with the 'Traffic control at work sites manual' (RMS, 2018) and Australian Standard 1742.3 Manual of uniform control devices.</p> <p><b>R3.</b> Notify NSW SES where there are likely to be significant delays in the operation of the roads affected by the upgrades.</p>
Socio-economic	<p><b>C1.</b> Notification is to be given to road users and adjacent properties prior to the works taking place. The notification is to include:</p> <ul style="list-style-type: none"> <li>• Details of the proposal.</li> <li>• The duration of works and working hours.</li> <li>• Any changed traffic or access arrangements.</li> <li>• How to lodge a complaint or obtain more information.</li> <li>• Contact name and details.</li> </ul> <p><b>C2.</b> All complaints are to be recorded on a complaint register and attended to promptly.</p> <p><b>C3.</b> Existing access for nearby and adjoining properties is to be maintained at all times during the works unless otherwise agreed to by the affected property owner.</p>
Landscape character and visual amenity	<p><b>V1.</b> Landscaping is to be managed in accordance with Transport for NSW Landscape guideline, 2013.</p> <p><b>V2.</b> Works to be carried out in accordance with Transport for NSW EIA-N04 Guideline for Landscape Character and visual impact assessment.</p>
Waste	<p><b>M1.</b> A Waste Management Plan must be prepared that follows the Transport for NSW Technical Guide: Management of road construction and maintenance waste.</p> <p><b>M2.</b> Resource management hierarchy principles are to be followed:</p> <ul style="list-style-type: none"> <li>• Avoid unnecessary resource consumption as a priority.</li> <li>• Avoidance is followed by resource recovery (including reuse of materials, reprocessing, recycling and energy recovery).</li> <li>• Disposal is undertaken as a last resort.</li> </ul> <p>(in accordance with the Waste Avoidance &amp; Resource Recovery Act 2001).</p> <p><b>M3.</b> If vegetation is to be mulched and transported off site for beneficial reuse, it is to be assessed for the presence of weeds, pests, and other diseases, and a Mulch Management Plan prepared in accordance with the Transport for NSW Technical Procedure: Mulch Management.</p> <p><b>M4.</b> Bulk project waste (e.g. fill) sent to a site not owned by the Transport for NSW (excluding EPA licensed landfills and resource recovery facilities) is to have prior formal written approval from the landowner, in accordance with Environmental Direction No. 20 – Legal Off-site Disposal of Transport for NSW Waste. This includes waste transported for reuse, recycling, disposal or stockpiling.</p> <p><b>M5.</b> There is to be no disposal or re-use of construction waste on to other land.</p> <p><b>M6.</b> Waste is not to be burnt on site.</p>

## Safeguards for the proposed work

**M7.** Waste material, other than vegetation and tree mulch, is not to be left on site once the works have been completed.

**M8.** Working areas are to be maintained, kept free of rubbish and cleaned up at the end of each working day.

**M9.** Tree mulch can be reused onsite to stabilise soil by spreading on embankments (no more than 100m thick) within the road reserve. Tree mulch will not be spread on the lower slopes of stream banks.



# Appendix C: HW16 Bruxner Highway S5390-5400 Mallanganee Range – Willocks Street MWREF