

OUT17/11059

Ms Amy Robertson
Modification Assessments
NSW Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

amy.robertson@planning.nsw.gov.au

Dear Ms Robertson

**Modification 3 to Belle O'Connor Street Residential Subdivision (MP 08_0167 MOD 3)
Comment on the Statement of Environmental Effects (SEE)**

I refer to your email of 31 January 2017 to the Department of Primary Industries (DPI) in respect to the above matter. Comment has been sought from relevant divisions of DPI. Views were also sought from NSW Department of Industry - Lands that are now a division of the broader Department and no longer within NSW DPI. Any further referrals to DPI can be sent by email to landuse.enquiries@dpi.nsw.gov.au.

DPI has reviewed the application and the accompanying statement of environmental effects. DPI provides the following recommendations for consideration in assessment of the proposal, with detailed comments at **Attachment A**.

Recommendations

1. It is recommended the proponent have an approved Groundwater Monitoring and Contingency Program in place and implemented well in advance of the commencement of any earthworks related to the original development and development modifications. DPI Water requests consultation during development of this program. The Acid Sulphate Soil Management Plan (Appendix Q) as presented may not be adequate to effectively manage the risk from environmental damage as a result of acid sulphate soils.
2. The proponent should clarify that the drainage swales will be designed and constructed consistent with the existing consent. There appears to be a change in the drainage swales from incorporating macrophytes and broad-leaved native species, to a grassed drainage channel presented in this modification. This change could impact on the water quality outcomes and reduce the riparian vegetation outcomes.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'M Isaacs'.

Mitchell Isaacs
Director, Planning Policy & Assessment Advice
17 March 2017

DPI appreciates your help to improve our advice to you. Please complete this three minute survey about the advice we have provided to you, here:
<https://goo.gl/o8TXWz>

Modification 3 to Belle O'Connor Street Residential Subdivision (MP 08_0167 MOD 3)**Detailed comments****Management of groundwater and acid sulfate soils**

- The Acid Sulphate Soil Management Plan (Appendix Q) refers to works that may intercept the groundwater table and the requirement for dewatering. DPI Water supports the general principles of soil management in the ASSMP, however additional information such as a dewatering management plan and groundwater monitoring plan are required to ensure disturbance of Acid Sulphate Soils (ASS) can be managed appropriately. These aspects may form a part of the Groundwater Monitoring and Contingency Program required by Condition B16 of the project approval, however it is not clear.
- It is recommended the proponent have an approved Groundwater Monitoring and Contingency Program in place and implemented well in advance of the commencement of any earthworks related to the original development and development modifications. DPI Water requests consultation during development of this program.
- The dewatering management plan will require detailed discussion of the acid sulphate soils occurrence in relation to the excavation works, details of the proposed excavation works and dewatering program, handling of acid sulphate soils, the proposed treatment and discharge of groundwater extracted from acid sulphate soils and groundwater monitoring designed and implemented exclusively for the dewatering activity.
- DPI Water requests consultation during development of this plan.
- Monitoring and management of potential contaminants discharged from the site into the SEPP 14 wetland will be a key issue during construction and operations. It is recommended this be addressed within the ASSMP and to include trigger levels and contingency planning for both surface water and groundwater. Metal contaminants associated with discharges from Acid Sulphate Soils such as aluminium, copper and iron are recommended for inclusion. DPI Water is aware there is a proposed Water Quality Monitoring Program for the site, however it is important this be integrated with the ASSMP due to its role in water quality management.
- Dewatering volumes and the associated timeframe for both construction dewatering and potential ongoing groundwater discharge into drains have not been identified. DPI Water advises the proponent will be required to hold sufficient water entitlement in the relevant water source to account for the proposed groundwater take prior to this take occurring. Where the water take is to be less than 3ML and of a temporary nature the proponent is requested to consult with DPI Water to confirm licensing requirements.

Drainage swale design and construction

- The Landscape Plan (Appendix F) depicts a drainage swale at the northern boundary. It is unclear whether this is proposing a variation to the approved bioretention swale in this area, however its shape and design appear different. The Landscape Plan (Appendix F) and Section 5.5 of the SEE depicts the modified drainage system which includes the central north-south swale and an east-west swale. DPI Water is supportive of maintaining the structure and functioning of the bioretention swale as originally currently approved, including the vegetative structure as approved in Mod 1, which included macrophytes and broad leaved native plants.. Clarification is therefore requested.
- DPI Water is supportive of these swales to maintain the vegetative structure as approved in Mod 1, which included macrophytes and broad leaved native plants. Clarification is requested that this structure is to be maintained.

END ATTACHMENT A