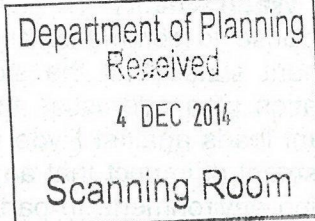


PCU057273

Our reference:  
Contact:

EF14/6056:DOC14/156506-05:PW  
Paul Wearne (02) 4224 4100



NSW Department of Planning and Environment  
Major Projects Assessment  
(Attention: Mark Brown)  
GPO Box 39  
SYDNEY NSW 2001

Dear Sir

### **SUBMISSION REPORT**

### **M2 SITE WITHIN THE NORTH RYDE STATION URBAN ACTIVATION PRECINCT (SSD 5093)**

I am writing in reply to your request for comment regarding the Response to Submissions and additional information received by the Environment Protection Authority (EPA) on 21 November 2014.

On the basis of a review of the submitted information, it appears that the Response to Submissions Report does not adequately address all of the issues raised in our response dated 23 September 2014. The EPA considers information is still required on a number of issues. These issues should be considered by Department of Planning and Environment (DPE) in its assessment and determination of the proposal. These issues are outlined in the attachment to this letter (**Attachment A**) and relate to the following:

- Water Quality
- Contaminated Land
- Sewage Management; and
- Future Development.

If you have comments regarding the above, please phone Paul Wearne on (02) 4224 4100.

Yours sincerely

**PETER BLOEM**  
**Manager Illawarra**  
**Environment Protection Authority**

Att



## ATTACHMENT

### 1. Water Quality

In response to comments on water quality detailed in the EPA's letter dated 23 September 2012, the proponent states that the stormwater management submitted with the State Significant Development application plan addresses the EPA comments. While the plan did provide an assessment of residual pollutant loads against Ryde City Council Development Control Plan (DCP) criteria, it did not include an assessment of impact that any proposed discharges (construction and post construction) will have on the receiving environment. In particular, whether the water discharged from the site will not adversely impact watercourses such as Porters Creek and Lane Cove River. Such an assessment was also a Director General Requirement. The EPA also identified a range of other matters in its response which have also not been fully addressed to date.

In addition, the proposal involved a treatment train approach for the management of stormwater that will require regular and ongoing maintenance to ensure performance. The EPA recommended that information be sought from the proponent on who would be responsible for the management of these features and also the funding arrangements for their ongoing management. The Submissions Report did indicate that stormwater was a consideration as part of the Voluntarily Planning Agreements (VPA). It is unclear from the Submissions Report, however, whether the VPA has addressed this issue. In addition, it is still unclear who and how management of the stormwater features will be undertaken post development.

### 2. Contaminated Land Management

The EPA raised the issue of potential gas migration as a result of the former Porters Creek Landfill at North Ryde. The Submissions Report did not include any information on this issue other than discussions regarding former waste activities at the site. The EPA recommends that the proponent should seek advice from their contaminated land consultant to ensure this matter has been considered and whether it is a matter that should be addressed in the Remediation Action Plan.

### 3. Sewage Management

Comments from Sydney Water in the Submissions Report highlighted potential reticulation capacity issues that require augmentation. As requested, the EPA recommended that information should be sought from the proponent on whether any additional load as a result of developing the site will impact the system's environmental performance. This included sewage overflows from any existing sewage pumping stations. As indicated in the EPA's previous response, the EPA's policy is that for new systems there should be no pollution of waters as a result of overflows during dry weather and that overflows during wet weather should be minimised. Sewage overflows have been identified as one of the major contributors to diffuse source water pollution in urban environments.

### 4. Future Development

The EPA provided in its response a range of matters that should be considered as part of any future development applications for the site. To ensure these matters are addressed, the EPA recommends that DPE should ensure these matters are adequately addressed in Ryde City Council DCP. If not, the EPA recommends that the DCP should be appropriately amended.