



OUT13/34431

- 6 DEC 2013

Ms Sera Taschner
Strategic Assessment
NSW Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

sera.taschner@planning.nsw.gov.au

Dear Ms Taschner,

**North Ryde Station Precinct – Station Sub-precinct (NRSP SS-DGRs)
Request for input into Director General Requirements**

I refer to your email dated 14 November 2013 to the Department of Primary Industries (DPI) attaching a letter dated 11 November 2013 to the NSW Office of Water, a division within DPI, in respect to the above matter.

Comment by the NSW Office of Water

The NSW Office of Water has reviewed the draft Director General's Requirements (DGR's) and advises they be amended to include that the Environmental Impact Statement (EIS) also consider:

- (i) an assessment of potential impacts of the proposal on any watercourses, riparian land and groundwater dependent ecosystems (GDEs) in the vicinity of the site,
- (ii) the detailed matters listed in Attachment A, and
- (iii) the policies and guidelines, as applicable, included in Attachment A.

The Office of Water also advises:

- (i) reference in this regard is also made to the NSW Office of Water's previous submissions in respect to the setting of DGR's for the North Ryde Station Precinct dated 31 March 2011 and 16 January 2012, and
- (ii) in addition to the formal referral of future stages of this matter direct to DPI (see below), it is requested that one (1) hard copy and one (1) CD of the EIS report and any accompanying documentation is also forwarded to Janne Grose at the Office of Water, PO Box 323, Penrith NSW 2750.

For further information please contact Janne Grose, Planning and Assessment Coordinator (Penrith office) on 4729 8262, or at: Janne.Grose@water.nsw.gov.au.

Comment by Crown Lands

The DPI response, dated 27 June 2013, to the exhibition of the environmental assessment for the overall State Significant site proposals for this locality included comment by the Crown Lands Cemetery Reform Group. This comment related primarily to that part of the overall proposals now known as the 'M2' site and as such are not reiterated here.

For further information please contact John Filocamo, Manager Crown Cemetery Policy-Cemetery Reform Group (Parramatta office) on 8836 5313, or at: john.filocamo@lands.nsw.gov.au.

Comment by Fisheries NSW

Fisheries NSW has no comment.

For further information please contact Carla Ganassin, Conservation Manager (Wollongong office) on 4254 5527, or at: carla.ganassin@dpi.nsw.gov.au.

Further referrals

It is noted that the referral letter dated 11 November 2013 is out of date in respect to the nomination of relevant officers. In addition, to assist DPI in coordinating responses on State Significant development matters, all referrals should be sent to the central DPI email address: landuse.enquiries@industry.nsw.gov.au. Internal referral to relevant DPI agencies will then be made.

Yours sincerely



Tony Heffernan

Acting Executive Director Business Services

Attachment A

North Ryde Station Precinct – Station Sub-precinct (NRSP SS-DGRs) Request for Input into Director General Requirements

Additional comment by the NSW Office of Water

1. Relevant Legislation

The Environmental Impact Statement (EIS) should take into account the objects and regulatory requirements of the *Water Act 1912* and *Water Management Act 2000* (WMA 2000), as applicable. Proposals and management plans should be consistent with the Objects (s.3) and Water Management Principles (s.5) of the WMA.

2. Water Sharing Plans

The proposal is located within the area covered by the *Water Sharing Plan for the Greater Metropolitan Region Unregulated River Water Sources* and the *Water Sharing Plan for the Greater Metropolitan Region Groundwater sources*. The EIS is required to:

- Demonstrate how the proposal is consistent with the relevant rules of the WSP including rules for access licences, distance restrictions for water supply works and rules for the management of local impacts in respect of surface water and groundwater sources, ecosystem protection, water quality and surface-groundwater connectivity.
- Provide a description of any site water use (amount of water from each water source) and management including all sediment dams, clear water diversion structures with detail on the location, design specifications and storage capacities for all the existing and proposed water management structures.
- Provide an analysis of the proposed water supply arrangements against the rules for access licences and other applicable requirements of any relevant WSP
- Provide a consolidated site water balance.

3. Relevant Policies and Guidelines

The EIS should take into account the following policies (as applicable):

- NSW State Rivers and Estuary Policy (1993)
- NSW State Groundwater Policy Framework Document (1997)
- NSW State Groundwater Quality Protection Policy (1998)
- NSW State Groundwater Dependent Ecosystems Policy (2002)
- Aquifer Interference Policy (2012)
- Department of Primary Industries Risk Assessment Guidelines for Groundwater Dependent Ecosystems (2012)
- Guidelines for Controlled Activities (2012).

Refer:

<http://www.water.nsw.gov.au/Water-management/Law-and-policy/Key-policies/default.aspx>

The EIS needs to demonstrate the proposal is consistent with the spirit and principles of these policy documents.

4. Licensing Considerations

The EIS is required to provide:

- Details of the water supply source(s) for the proposal including any proposed surface water and groundwater extraction and all water supply works to take water.
- Information on the purpose, location, construction and expected annual extraction volumes including details on all existing and proposed water supply works which take surface water, (pumps, dams, diversions, etc) and

- Details on all bores and excavations for the purpose of investigation, extraction, dewatering, testing and monitoring and an approval obtained from the Office of Water prior to their installation. All predicted groundwater take must be accounted for through adequate licensing

Water allocation account management rules, total daily extraction limits and rules governing environmental protection and access licence dealings also need to be considered.

5. Groundwater Assessment

Section 5.5 of the Application for Director General's Requirements Report notes the EIS will address and consider the construction and operation impacts of or on groundwater (page 6). It is suggested the draft DGR (11) - *Construction impacts* is amended to "Construction and Operation impacts" so that the EIS also includes an assessment of potential operation impacts in relation to groundwater.

The Office of Water's DGR submission of 31 March 2011 provides details on what the EIS should address in relation to potential impacts on groundwater.

6. Groundwater Dependent Ecosystems (GDE's)

It is suggested the draft DGR (11) - *Construction Impacts* is amended to also consider the potential impacts on any groundwater dependent ecosystems (GDEs) in the vicinity of the site. Figure 13 in the Ecological Assessment for the Rezoning of North Ryde Station precinct shows Coastal Sandstone Sheltered Peppermint- Apple Forest is located south of the sub precinct and Volume 3 of the Risk Assessment guidelines (Appendix 9) indicates Coastal Sandstone Sheltered Peppermint- Apple Forest has high probability of being a GDE.

The Office of Water's DGR submission of 31 March 2011 provides details on what the EIS should address in relation to GDE's.

7. Watercourse and Riparian Land

It is noted the draft DGRs (5) and (7) have deleted reference to potential indirect impacts on the nearby Lane Cove National Park and potential impacts on watercourses and riparian corridors. As Pages Creek is located south of the site/Epping Road and the creek flows into the National Park and Lane Cove River, it is suggested the draft DGR's is amended so that the EIS addresses whether the proposal could potentially indirectly affect watercourses and riparian land located in the vicinity of the sub precinct site, and if so, the EIS should provide a detailed description of:

- the potential impacts and
- mitigation measures to mitigate potential impacts.

End Attachment A