



03 August 2016

Carol Ng  
SUEZ Recycling & Recovery Australia  
PO Box 3500  
RHODES NSW 2138

Our ref: 21/23482  
Your ref: 217097

Dear Carol,

**Lucas Heights Resource Recovery Park (SSD 6835)**  
**RE: Department of Primary Industries Comments on the Response to Submissions Report**

I refer to the letter from the Department of Primary Industries (DPI) dated 8 July 2016 regarding the above matter. The purpose of this letter is to respond to the three issues raised by DPI.

**Issue 1 Riparian Zone**

DPI provided the following response:

*The proponent has indicated at 9.1.1 that a vegetated riparian zone of 10m either side of Mill Creek is proposed, but also at 9.1.2 that the previous plan approved in 2006, which required a 20m corridor either side of the creek, will be used as a basis for the works. The proponent should provide clarification, with consideration of the Guidelines for Controlled Activities on Waterfront Land (DPI 2012).*

GHD response:

The width of the vegetated riparian zone either side of Mill Creek of 10 metres has been proposed in accordance with the minimum requirements for first order streamlines as set out in the Guidelines for Controlled Activities on Waterfront Land (DPI, 2012). Although this represents a reduction in the width of the riparian zone of 20 m as proposed in the previous plans, the revised width satisfies the footprint requirements of the proposed development whilst still maintaining a vegetated riparian zone width sufficient for protection and enhancement of the biophysical functioning of Mill Creek.

It should also be acknowledged that the proposed development represents a land use change to those conditions existing at the time of preparation of the previous plans. The previous plans will be revised to take account of the proposed land use and vegetated riparian zone width changes associated with the proposal. Preparation of the revised plans will consider opportunities to increase the width of the vegetated riparian zone beyond 10 metres wherever possible along the reach of Mill Creek adjacent to the proposed development.

**Issue 2 Macroinvertebrate Monitoring**

DPI provided the following response:

*The independent specialist that is proposed to be engaged by SUEZ should advise whether additional baseline aquatic monitoring is required prior to the project commencing, and on the adequacy of the proposed frequency of the macroinvertebrate monitoring.*

GHD response:

The original response to this question was provided in Sections 9.1.7 and 9.1.8 of the *Response to Submissions and Preferred Project Report* (SUEZ June 2016).

GHD believes that there would be minimal benefit in undertaking further baseline aquatic monitoring before the project commences because:

- The macroinvertebrate study undertaken indicated that spatial extent of existing impacts is limited
- Ammonia, a prime indicator of the presence (or absence) of leachate is included in the regular surface water monitoring program. Increases in measured ammonia levels would indicate worsening impacts (which are not expected)
- As detailed in Section 6.5 of the Surface Water Assessment, the proposal is expected to improve water quality downstream. The EIS recommends that ongoing macroinvertebrate assessment be undertaken '*every three years commencing soon after reprofiling works commence in Area E*'.

For the above reasons, GHD considers that an 'independent specialist' should be consulted and provide their input on the next round of aquatic monitoring after the project is determined, rather than at the current time. This will enable their advice to take into account all of the relevant conditions of consent and have their advice considered when updating of the LHRRP OEMP (Operations Environmental Management Plan) occurs.

### **Issue 3      Consultation with DPI Water**

DPI provided the following response:

*DPI Water should be consulted on all relevant management plans, in particular the updated Mill Creek Stream Rehabilitation and Stabilisation and Vegetation Management Plan, and relevant plans that address groundwater monitoring and management.*

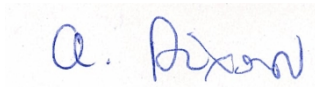
GHD response:

GHD recommends that SUEZ consults with DPI Water on all relevant management plans, in particular the updated Mill Creek Stream Rehabilitation and Stabilisation and Vegetation Management Plan, and relevant plans that address groundwater monitoring and management.

### **Conclusion**

In conclusion, if you have any questions regarding the above advice, please contact either David Gamble or myself on the numbers listed below.

Sincerely  
GHD Pty Ltd

A handwritten signature in blue ink that reads "A. Dixon".

**Anthony Dixon**  
Service Group Manager - Waste Management  
02 9239 7025

A handwritten signature in black ink that reads "David Gamble".

**David Gamble**  
Service Line Leader - Waste Management  
02 9239 7354