



Department of Primary Industries

OUT16/28123

Ms Pamela Morales
Industry Assessments
NSW Department of Planning and Environment
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SYDNEY NSW 2001

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Dear Ms Morales

Borg Panels Timber Processing Facility (SSD 7016) Comment on the Environmental Impact Statement

I refer to your email dated 8 June 2016 to the Department of Primary Industries in respect to the above matter. Comment has been sought from relevant divisions of DPI. Any further referrals to DPI can be sent by email to landuse.enquiries@dpi.nsw.gov.au.

The Department reviewed the exhibited Environmental Impact Statement and provides the following comments and recommendations:

- Appendix J indicates a water supply demand from the proposed stormwater treatment pond of 200m³/day (73ML/yr). This report also refers to a proposed stormwater harvesting demand of 120ML/yr, the proponent should clarify the demand. The proponent should also provide details on the difference in the water demands between the existing and the proposed project and how this may alter the current demands from on-site and town water supplies.
- Section 15.3 indicates the proposed surface water harvesting and reuse scheme will result in a reduction of runoff leaving the site by approximately 133ML/yr. The proponent has requested a dispensation from requiring an access licence under the *Water Management Act 2000* to harvest the volumes generated from the impervious site. DPI Water advises that where a dam is constructed solely to manage runoff from potentially contaminated sites and is sized appropriately, an access licence is not required. The capture of rainwater from roof runoff in tanks also does not require an access licence. However clean runoff from upstream sources and/or within the project site that is captured in dams on minor watercourses would need to be considered in the proponents Maximum Harvestable Rights Dam Capacity (MHRDC) or by adequate entitlement held in a Water Access Licence. The proponent should confirm the source of the runoff for the proposed storages and identify how they are considered under water legislation. The proponent should undertake further consultation with DPI Water to confirm licensing requirements where water is captured from other sources.
- An additional 6ML stormwater treatment pond is proposed. This pond appears to be in close proximity to the existing watercourse, however the EIS indicates no works are proposed within 40m of a creek line. The proponent should clarify if this pond is outside of the 40m as no specific distance to the high bank of the watercourse has been provided. Works that are proposed within 40m of a watercourse need to be

carried out in accordance with DPI Water's Guidelines for Controlled Activities on Waterfront Land.

- Figure 10 of Appendix J indicates an existing v-notch weir on the watercourse at the downstream end of the site is proposed to be moved upstream. This work would be within 40m of the watercourse. The proponent should complete further assessment on the impacts of removing the existing site and the necessary mitigation measures, in addition to an impact assessment of installing the new work.
- Scenario modelling of the runoff from the site in Appendix J indicates 1) rural runoff from the project site would equate to 140.35ML/yr, 2) runoff from the developed site with harvesting would be 287.5ML/yr and 3) runoff from the developed site without harvesting would be 406.5ML/yr. This indicates the significant increase in runoff from impervious areas in comparison to rural land due to the project.
- The assessment of the proposed harvesting and reuse scheme indicates a reduction in runoff from the site by 133ML/yr due to implementing the proposed harvesting option. This is despite an increase in runoff of 39ML/yr from the additional impervious area (10.5 hectares of roof area). The proponent should complete an assessment of the impact on existing downstream water users due to this reduction.

Should you require further information please contact Tim Baker, Senior Water Regulation Officer on (02) 68417403, Tim.Baker@dpi.nsw.gov.au.

Yours sincerely



Graeme White
A/Director, Planning Policy & Assessment Advice
27 July 2016