



Department of Primary Industries

OUT17/37420

Mr Daniel Gorgioski
Transport Assessments
NSW Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

daniel.gorgioski@planning.nsw.gov.au

Dear Mr Gorgioski

Albion Park Rail Bypass (SSI 6878) Comment on the Submissions and Preferred Infrastructure Report

I refer to your email of 8 September 2017 to the Department of Primary Industries (DPI) in respect to the above matter. Comment has been sought from relevant branches of DPI. Views were also sought from the Crown Lands and Water Division of the NSW Department of Industry.

Any further referrals to DPI can be sent by email to landuse.enquiries@dpi.nsw.gov.au.

DPI provides the following comments for consideration in the assessment of the proposal.

Operational Water Quality

DPI does not consider that advice provided in correspondence dated 8 August 2017 (OUT17/28158) regarding the adopted operational water quality objectives has been adequately addressed. The previous advice provided by DPI remains relevant and it is requested that Roads and Maritime Services addresses these comments, which have been reproduced at **Attachment A**.

Interaction with agricultural enterprises

DPI recommends ongoing consultation regarding interaction with agricultural enterprises as follows:

- Continued consultation in regard to access for dairy cattle between paddocks and the dairy during flood events.
- Construction phase impacts on flood behaviour to be considered during detailed design phase with consultation undertaken with affected landowners.
- The potential risk issues associated with pedestrians, cyclists, cattle and farm machinery crossing at Frazers Creek bridge raised in correspondence dated 4 December 2015 (OUT15/34046) remain. These matters are to be addressed in consultation with and to the satisfaction of affected landowners.

Management of impacts to waterfront land and water resources

Crown Lands and Water Division reiterates the previous recommendation that consultation should be undertaken with the Division during the detailed design phase regarding management of impacts to waterfront land, including (but not limited to) the following matters:

- geomorphological assessment of watercourses with the aim of minimising changes to natural stream flows and to adequately protect bank stability,
- design of creek realignments, reconstruction and scour protection works,
- works at bridge sites over watercourses and adjoining waterfront lands,
- design of permanent and temporary creek crossings,
- determination of riparian corridors and the preparation of plans for revegetation and riparian works in/along all watercourses affected by the project.

Consultation with Crown Lands and Water Division should also be included to Environmental management measures GW01, GW02 and GW03 in relation to groundwater management and interception.

Yours sincerely



Alison Collaros
A/Director, Planning Policy & Assessment Advice
25 September 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>

Albion Park Rail Bypass (SSI 6878)
Comment on the Submissions and Preferred Infrastructure Report

Reproduced from correspondence OUT17/28158 (8 August 2017):

Operational Water Quality

DPI does not consider the Wollongong City Council Development Control Plan (DCP) targets are the most appropriate standards to adopt for operational water quality. The Illawarra Shoalhaven Regional Plan provides a more recent direction with regard to water quality objectives including:

- *DIRECTION 5.4 Secure the health of coastal landscapes by managing land uses and water quality, which states:*
 - *The agreed environmental values and goals for the State's surface waters are set out in the NSW Water Quality Objectives; and includes*
 - *ACTION 5.4.1 Protect sensitive estuaries and coastal lakes, which states:*
 - *A higher level of management intervention is needed to protect, maintain and/or restore the water quality and ecological condition of these sensitive estuaries (including Lake Illawarra).*

The proposed Operational Water Quality Targets are given in Table 4.3 (which is a revision of Table 16.3 in the EIS). The table indicates the “adopted average annual load reduction targets” for 4 parameters (Total Suspended Solids, Total Phosphorus, Total Nitrogen and Gross Pollutants) in 4 subcatchments (i.e. 16 targets in total). The table further indicates (with green highlight) when the DCP water quality targets are achieved. Of the 16 individual targets, the DCP targets are predicted to be met for only 8. The adopted targets for Total Nitrogen are particularly low at 19% to 30% (compared to the DCP target which is 40-45% retention). The RMS is effectively saying that it is acceptable for 70 - 81% of generated TN to pass off the site and enter Lake Illawarra. DPI does not consider that constitutes an acceptable outcome.

Table 4.2 Correction to drainage and water quality principles indicates that “Runoff from ramps, service, access and local roads” and “Runoff from main carriageways” “Does not require treatment prior to discharge, as long as overall targets in Table 4.3 are achieved”. Notwithstanding the concerns regarding the acceptability of the proposed targets, as identified above Table 4.3 indicates 50% of the proposed targets will not be achieved. If the overall targets are not achieved, it is unlikely to be feasible to retrofit additional water quality improvement measures. Further, in the absence of a comprehensive water quality assessment study, it will be impossible to determine if the overall targets are being achieved.

Given that the Project is located in the catchment of Lake Illawarra which is recognised as a “sensitive estuary”, a higher than “standard” level of water quality protection is warranted. DPI recommends that the proposed operational water quality measures be reviewed to ensure that all reasonable water quality treatment options are embraced so that water quality targets are fully and completely met in all subcatchments.

END ATTACHMENT A