



Department of Primary Industries

OUT16/4528#35

Mr Brent Devine
Social Infrastructure Assessments
NSW Department of Planning and Environment
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Dear Mr Devine

Camden Medical Campus Precinct (SSD 7387) Comment on the Environmental Impact Statement

I refer to your email dated 1 August 2016 to the Department of Primary Industries (DPI) in respect to the above matter. Comment has been sought from relevant divisions of DPI. Views were also sort from NSW Department of Industry - Lands which is now a division of the broader Department and no longer within NSW DPI. Any further referrals to DPI can be sent by email to landuse.enquiries@dpi.nsw.gov.au.

The Department has reviewed the Environmental Impact Statement (EIS) and provides the following recommendations to be addressed prior to determination of the application, with detailed comments at **Attachment A**:

Recommendations

- 1) The proponent should demonstrate the proposed riparian protection area in Management Zone 1 is consistent with the requirements of the [Oran Park and Turner Road Waterfront Land Strategy 2009](#). Specifically, the restored and rehabilitated riparian protection area should comprise:
 - a) a core riparian zone of an average of 40 metres (20 metres either side of the watercourse) measured from the top of the bank,
 - b) the width of the watercourse itself, and
 - c) a 10 metre vegetated buffer either side of the core riparian zone;
- 2) Revegetation should be undertaken using local provenance vegetation, with the core riparian zone revegetated to a density that would occur naturally; and
- 3) Works on waterfront land, including outlets structures, should be consistent with the DPI Water Guidelines for Controlled Activities (2012) available at <http://www.water.nsw.gov.au/water-licensing/approvals/controlled-activity>.

Should you require further information please contact Janne Grose, Water Regulation Officer (Parramatta) on (02) 8838 7505.

Yours sincerely

A handwritten signature in purple ink, appearing to read 'G. White', with a stylized flourish at the end.

Graeme White

A/Director, Planning Policy & Assessment Advice

5 September 2016

**Camden Medical Campus Precinct (SSD 7387)
DPI comment on the Environmental Impact Statement**

The SSD site is located within the Gregory Hills Corporate Park and the Turner Road Growth Centres Precinct. The gazetted [Oran Park and Turner Road Waterfront Land Strategy 2009](#) applies to waterfront land within the Precinct.

The strategy maps the tributary of South Creek as a category 2 watercourse. Consistent with the strategy, the EIS indicates that the proposal seeks to adhere to the controls outlined for category 2 watercourses and to achieve outcomes consistent with a category 3 watercourse for the tributary. However, the proposed vegetation management of the riparian corridor appears to be inconsistent with both the category 2 controls and the category 3 outcomes.

Riparian protection area

The controls for a category 2 watercourse in the strategy require a riparian protection area of a minimum overall width of 60 metres that includes:

- a core riparian zone (CRZ) of an average of 40 metres (20 metres either side of the watercourse) measured from the top of the bank and emulating natural endemic density;
- the width of the watercourse itself;
- and a 10 metre vegetated buffer either side of the CRZ.

The proponent should clarify the following apparent inconsistencies in the planned riparian protection area:

- the amended vegetation management plan (dated 6 November 2015) indicates that Management Zone 1, incorporating the tributary, will be approximately 60 m wide (see Section 3.1.1, page 10);
- the Indicative Cross Section for Management Zone 1 (Appendix 5 of VMP) only shows the total width of the CRZ to be 40 m wide - it has not included the 5 m wide creek in this width;
- the EIS (Section 8.10.2, page 94) and Addendum to the Bushfire Protection Assessment (Appendix 7 to EIS) state the vegetation management plan requires the revegetation along the narrow corridor to be no wider than 10 m on either side of the 5 m wide creek bed which is not consistent with the Category 2 Controls;

Revegetation requirements

The outcomes in the strategy for a Category 3 watercourse allow for an engineered solution to the watercourse (where it is not possible to retain the natural functions of a stream). The outcomes do not indicate the planting within the core riparian zone can be modified to allow for an asset protection zone, nor does Figure 7 in the Strategy show this can occur. Further, the [Turner Road Development Control Plan](#) states that asset protection zones are to be located wholly outside of the core riparian zone and that “where sufficient room is available within the road reserve and the front yard of private lots, the asset protection zone shall be located wholly within these areas. Where insufficient room is available, the vegetated buffer to the core riparian zone may be considered appropriate for a portion of the asset protection zone” (Section 6.6, page 58 of DCP).

The EIS states no asset protection zones are required for the site, however also notes the vegetation management plan has been changed so that the corridor will be vegetated such that it does not constitute bush fire prone vegetation (Section 8.10.1, page 94), while the VMP proposes to vegetate the riparian corridor (including the CRZ) so it is not a bushfire hazard (see Appendix 5 of the VMP– indicative cross section for Management Zone 1). This

appears consistent with an asset protection zone. The proponent should clarify whether any asset protection zone is required for the site, and ensure the project is consistent with requirements by ensuring that any such zone is not located within the riparian protection area, with revegetation of the CRZ in particular consistent with a density that would occur naturally.

The EIS also indicates that works within the vegetated buffers of the riparian zone will include construction of retaining walls and fill. The construction of retaining walls within a vegetated buffer does not appear to be consistent with the Strategy.

END ATTACHMENT A