

Our ref: D2018/41285

Mr David Gibson
Team Leader Social Infrastructure Assessments
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Attention: Ms Ingrid Berzins

Dear Mr Gibson

SSD 8667 – Goulburn Base Hospital Redevelopment

Thank you for your letter received 9 April 2018 seeking WaterNSW's comments on the Goulburn Base Hospital Redevelopment Project (SSD 8667).

The site is in the Sydney Drinking Water Catchment and the State Environmental Planning Policy (Sydney Drinking Water Catchment) 2011 (the SEPP) therefore applies.

WaterNSW has reviewed the Environmental Impact Statement (EIS) prepared by City Plan Strategy & Development Pty Ltd (dated 5 March 2018) and supporting documentation, and has the following comments:

1. The EIS refers to the State Environmental Planning Policy (Sydney Drinking Water Catchment) 2011 (the SEPP). However, it does not include an assessment of whether the proposed development will have a neutral or beneficial effect on water quality (NorBE).
2. Although stormwater treatment measures have been proposed, not enough detail has been provided to adequately assess their suitability. Clause 9 of the SEPP notes that any development or activity proposed to be carried out on land to which the SEPP applies should incorporate WaterNSW's current recommended practices and standards (CRPs). These are listed on WaterNSW's website at <https://www.waternsw.com.au/about/pubs/crp>. The CRPs relevant to this project include those addressing stormwater and construction stage erosion and sediment controls.
3. The detail regarding stormwater treatment and management in the Civil & Structural Design Report and Drawings prepared by Bonacci (dated March 2018) is very limited and does not include the following information to adequately determine if the proposed development can achieve NorBE:
 - a. There is no specific detail on the changes to pervious and impervious areas across the site post development. It appears from the plans provided that the total pervious areas on site will be halved.
 - b. The report does not include a detailed assessment of the suitability of proposed stormwater measures including the sizing and design of proposed bioretention basins and how they will be maintained. This should be supported by suitable stormwater quality modelling to demonstrate NorBE can be achieved. Specific information requirements are detailed below.

- c. Specific comments related to the Siteworks and Stormwater Drainage Plan (Dwg No. C031; Rev P1; Sheet 1; dated 22.09.17) prepared by Bonacci Group (NSW) Pty Ltd include:
- i. Consider redirecting treated stormwater from the bioretention basin leaving surface inlet pit B10 to a point after B5, bypassing the bioretention basin at B6 to avoid that basin being overloaded.
 - ii. The Siteworks and Stormwater Drainage Plan should ensure that finished RLs are included for all pits.
 - iii. The size and specific design details for each bioretention basin should be outlined. There should be a cross section with the details for each bioretention basin.
4. The EIS suggests WaterNSW were consulted on the project in May 2017, however, the only consultation that occurred with WaterNSW was a brief phone conversation in November 2015 with the Bonacci Group Civil Engineers.

Considering the above, WaterNSW requests the following specific information be provided to determine if NorBE can be achieved:

- A MUSIC stormwater quality model which demonstrates a neutral or beneficial effect on water quality can be achieved with the proposed stormwater management measures and that the model be consistent with the Guideline for Using MUSIC in Sydney's Drinking Water Catchment (SCA, 2012).
- An updated Final Siteworks and Stormwater Drainage Plan consistent with the MUSIC model which addresses the above comments including specific details and sizing of proposed treatment measures, and appropriate cross sections.

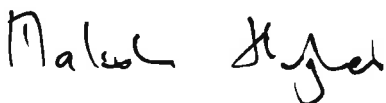
Should the project be approved, and if the above demonstrates NorBE can be achieved, WaterNSW recommends the following be included as conditions in the consent:

- An Operational Environmental Management Plan (OEMP) for the monitoring, management and maintenance of stormwater structures shall be prepared in consultation with WaterNSW.
- Given the site disturbance is more than 2,500 square metres, Sediment and Erosion Control Plans prepared by Bonacci Group (NSW) Pty Ltd shall be updated to Soil and Water Management Plans.

WaterNSW also requests to remain as a stakeholder for the proposal and any updates to relevant reports and plans. WaterNSW would also appreciate being notified when the application has been determined.

WaterNSW will further consider the application following a response to the above comments. If you wish to discuss further, please contact Nicole Wallwood on (02) 9865 2503.

Regards



MALCOLM HUGHES
Manager Catchment Protection