

**From:** [Wayne Jones](#)  
**To:** [Joanne Glass](#)  
**Subject:** Additional Clarence River Crossing, (Grafton Bridge), (SSI 13\_6103) EIS  
**Date:** Monday, 22 September 2014 11:21:41 AM

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Hi Joanne

Please see following draft DPI comments on the above project. Formal response should follow shortly.

Regards  
Wayne

OUT14/31162

Ms Joanne Glass  
Infrastructure Projects  
NSW Department of Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001

[Joanne.Glass@planning.nsw.gov.au](mailto:Joanne.Glass@planning.nsw.gov.au)

Dear Ms Glass,

**Additional Clarence River Crossing, (Grafton Bridge), (SSI 13\_6103)  
Response to exhibition of Environmental Assessment**

I refer to your email dated 18 August 2014 requesting advice from the Department of Primary Industries (DPI) in respect to the above matter.

Comment by NSW Office of Water

The NSW Office of Water (Office of Water) has reviewed the Environmental Impact Statement for the Additional Crossing of the Clarence River at Grafton and provides comments as follows, with recommended conditions of approval outlined in **Attachment A**, if the project is approved.

**Groundwater Management**

At present, the proposed development area is managed under the *Water Act 1912*. However this will be replaced by the Clarence Coastal Floodplain Alluvium Water Sharing Plan which is currently in draft form.

At the Test of Adequacy stage the proponent was requested to make an Aquifer Interference Assessment using the assessment framework however this was not provided.

The aquifer in the location is classed as "highly productive". The proposed development is classed as an aquifer interference activity however is defined as "minimal impact". This determination is based on the fact that <3ML/yr will be extracted (no dewatering is proposed so only the volume within the piers will be extracted). The project does not intersect Biophysical Strategic Agricultural Land (BSAL).

It is reported that the main risks to groundwater quality during construction of the project would be from groundwater contamination and acid sulphate soils. These will be managed through the standard Roads and Maritime Services (RMS) Contamination and Acid Sulfate Soils Management Plans which have previously been reviewed by the Office of Water. These are also legislated by the Office of Environment and Heritage.

Groundwater Dependent Ecosystem communities are present in the regional vicinity in the form of "Freshwater Wetlands on Coastal Floodplains", and "Subtropical Coastal Floodplain Forest". Given the limited extent of cutting proposed (1.2m max on 1 approach, and 0.2m beneath the railway

viaduct), the risk of blocking or diverting flows that support these systems is considered low.

The project is unlikely to impact the access, use or yield of registered groundwater bores. All landowners within the immediate vicinity of the project also have access to town water supply.

The RMS are exempt from the licensing of groundwater works associated with road construction unless the works are for, or water extracted for the work is used for, water supply purposes. The exemption works include; monitoring bores, dewatering, and cuttings. Should the works be for, or water extracted for the work is used for, water supply purposes, the RMS should be advised to obtain a licence.

### **Recommendations**

The Office of Water requires no further groundwater related information in regard to this review.

It is recommended that any groundwater works where water is extracted, or supplementary groundwater collected, for the purpose of water supply for the development should be licensed under the *Water Act 1912*.

### **Riparian Management**

The proposed development is classed as State Significant Infrastructure therefore a Controlled Activity Approval under the *Water Management Act 2000* is not required, however the works undertaken within 40 metres of the Clarence River and associated watercourses should be constructed in accordance with the Office of Water's Guidelines for Controlled Activities, to minimise any potential degradation.

### **Stormwater Management**

The EIS outlines a proposed drainage strategy for stormwater on the site including the diversion of stormwater runoff through a series of grass-lined open channels and culverts, eventually being discharged to Alipour Creek. It is important appropriate stormwater management measures are in place to limit any potential impacts on surface water and groundwater sources in the locality.

### **Erosion and Sediment Control**

The EIS outlines erosion and sediment control measures for the site will be undertaken in accordance with 'The Blue Book' during the works. It is important appropriate measures, including an Erosion and Sedimentation Control Plan are implemented on the site to limit any potential impacts on surface water and groundwater sources.

For further information please contact Christie Jackson, Water Regulation Officer, (Tamworth office) on (02) 6701 9652 or at [christie.jackson@water.nsw.gov.au](mailto:christie.jackson@water.nsw.gov.au).

Yours sincerely

### Comment by Fisheries NSW

Fisheries NSW acknowledge the bridge design and proposed construction methods outlined in the EIS minimise the need for instream work platforms. A range of techniques associated with the use of barges adopted by RMS for the Pacific HWY upgrade minimise and contain potential impacts on fish and fish habitat. Fisheries NSW anticipate that RMS will require the successful contractor employ those techniques for the Grafton bridge crossing.

Where instream work platforms are unavoidable Fisheries NSW endorses the principles outlined in the EIS to guide the design of work platforms. It is noted the EIS proposes for further involvement by Fisheries NSW and other relevant agencies as more detailed design work informs the specifics of any instream work platforms. Fisheries NSW value this ongoing involvement.

The EIS indicates that the need to provide measures to manage emergency spills from the bridge would be considered at the detailed design stage. Fisheries NSW recommend that the approval require features to manage emergency spills considering the high recreational, commercial and environmental value of the River and that the crossing is a major transport link. The detailed design stage should then determine the best design for these spill capture features to protect these environmental and community values.

For further information please contact Patrick Dwyer, Fisheries Conservation Manager (Wollongbar Office), on 6626 1397 or at [patrick.dwyer@dpi.nsw.gov.au](mailto:patrick.dwyer@dpi.nsw.gov.au).

## Attachment A

### Additional Clarence River Crossing, (Grafton Bridge), (SSI 13\_6103) Response to exhibition of EIS NSW Office of Water Recommended Conditions of Approval

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- The proponent is to obtain all relevant licences for the project under the *Water Act 1912*, particularly for any groundwater works where water is extracted, or supplementary groundwater collected, for the purpose of water supply for the development.
- To aid in the protection of receiving water source quality, all stormwater runoff must be adequately treated at its source and/ or diverted through the stormwater treatment process designed for the site, prior to the stormwater being discharged to surface water and groundwater sources.
- All works within or adjacent to riparian lands should be consistent with the NSW Office of Water's Guidelines for Controlled Activities.
- The proponent should develop an Erosion and Sedimentation Control Plan for the site to limit any potential impacts on surface water and groundwater sources.

**End Attachment A**

Regards  
Wayne

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