



Department of Primary Industries

OUT16/47610

Ms Alix Carpenter
Social and Other Infrastructure Assessments
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Dear Ms Carpenter

Moorebank Precinct West Stage 2 (SSD 7709) Comment on the Environmental Impact Statement

I refer to your letter dated 24 October 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 sought from NSW Department of Industry - Lands that are 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.

DPI has reviewed the application and Environmental Impact Statement (EIS) and provides the following recommendations, with further detail at **Attachment A**.

DPI's key focus is on:

- Riparian management, watercourse & geomorphic stability, erosion and sediment control
- Water quality, aquatic ecology, and related monitoring
- Wetland management , and
- Groundwater monitoring.

Riparian and associated management

- The proponent should provide a scaled plan that details the section of channel where the channel failure and scouring has occurred and proposed rehabilitation measures.
- The proponent should provide further detail and justification of the width of drainage channel outlets to be used during construction. The proponent should investigate and advise whether other options are available to minimise the outlet width and the potential impacts on the river bank profile and riparian connectivity. Outlet structures should be constructed in accordance with DPI Water's [Guidelines for outlet structures on waterfront land \(2012\)](#)
- The proponent should relocate native plants from areas that are to be permanently cleared into the riparian and conservation area identified for rehabilitation.
- The proponent should develop the Construction Environmental Management Plan (CEMP) and the Erosion and Sediment Control Plan (ESCP) in consultation with DPI Fisheries.
- The ESCP should be specifically designed to the erosive potential of the locally occurring soils, both natural soils and the fill material used in the works. It should also include measures to revegetate formed banks as soon as possible following

construction and use temporarily bank stabilisation methods prior to this where required.

- The proposed drainage channel works in the riparian zone present a specific erosion and sedimentation risk to the Georges River. The ESCP should include the staging of vegetation removal activities within this area to just prior to the construction of the drainage channel. There should be a commitment to minimise the area of vegetation damage in the riparian channels if possible, and a commitment to revegetate disturbed areas and stabilise soil temporarily if required.
- The minimum riparian buffer zone width for the project should be 40m in accordance with Condition E16 of the Approval for the Moorebank Precinct West (MPW) concept plan.

Water quality & aquatic ecology

- The proponent should implement the proposed mitigation measures relating to the Georges River, water quality and aquatic biodiversity during and following construction.
- Regarding mitigation measure 4H when translocating fish from drained ponds/dams it is important that only native fish that are endemic to the Sydney area are translocated to natural waterways. To ensure ethical animal welfare practices are employed, all pest fish are to be euthanized on ice. Should any non-endemic native species be encountered, then DPI Fisheries should be consulted to determine the best location to translocate this species.

Wetland

- The proponent has obtained an independent Wetland Assessment as required by condition E22 of the concept plan approval. The proponent should confirm that the recommendations of this assessment have been incorporated into mitigation measures, or clearly indicate if these recommendations have not been fully adopted.
- The Wetland Assessment identifies building waste and rubble present on the western banks of the Amiens Wetland. The proposed management of this waste is not outlined. The proponent should seek advice from the independent wetland specialist as to whether it is appropriate to remove the building waste and rehabilitate the western bank of the wetland.
- The proponent should provide details on whether Basin 4 is to discharge to the wetland, and if so the potential impact this could have on the hydrology of the wetland should be assessed.

Groundwater monitoring

- The proponent should provide further detail on the groundwater monitoring program, including a schedule and locations for monitoring.
- The Geotechnical Interpretative Report should include bore hole logs, details of groundwater monitoring bores, a bore census for water monitoring bores and users, and a summary of groundwater measurement levels.

Yours sincerely



Mitchell Isaacs

Director, Planning Policy & Assessment Advice

14 December 2016

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>

Attachment A

Moorebank Precinct West Stage 2 (SSD 7709) Comment on the Environmental Impact Statement Detailed comments – DPI Water

Table 22.1 Consolidated list of Mitigation Measures

Mitigation Measure 0B should be amended to list that as a minimum the CEMP would include a Flora and Fauna Management Plan and a Groundwater Monitoring Program (pages 593 and 594).

Mitigation Measure 4N is to explore opportunities to plant the detention basins with native aquatic emergent plants (page 604). Additional details are required as to whether the basin design can be dry and fully planted with terrestrial/riparian vegetation endemic to the local native vegetation community (consistent with DPI Water's *Guidelines for Controlled Activities on Waterfront Land*), particularly as basins 5, 6 and 8 adjoin the riparian corridor/conservation area. If so, it is recommended that the Mitigation Measure is amended to reflect this.

Mitigation Measure 4S relates to ongoing monitoring of macroinvertebrate communities upstream and downstream of the proposed basin outlets. The mitigation measure needs to clarify whether the monitoring sites also include upstream and downstream of the proposed Georges River bridge crossing. The mitigation measure should be amended to require a report to be prepared which includes details on the macroinvertebrate monitoring program (including proposed locations of monitoring, frequency of monitoring etc).

Mitigation measure 6X in Appendix A indicates ongoing monitoring of macroinvertebrate communities upstream and downstream of the proposed bridge notes the bridge is not part of the proposal but monitoring may be considered. While acknowledged that the bridge is not part of this proposal clarification is requested as to whether ongoing baseline macroinvertebrate monitoring is required prior to construction of the bridge

Mitigation Measure 6Z in Appendix A states a riparian restoration plan for the Georges River riparian zone is to be implemented. It indicates a management plan was prepared for the MPW concept plan EIS and it would be updated for the MPW project. The riparian restoration plan needs to be updated for the riparian zone particularly as the proposal indicates it will now require significant gaps for the basin outlets. Mitigation Measure 4P in Table 22.1 of the EIS should be amended to reflect that the riparian restoration plan should be updated, as it only states the CEMP and OEMP would consider and have reference to the weed removal and riparian vegetation restoration undertaken within parts of the Georges River corridor under the MPW Concept Approval (page 604).

Mitigation Measure 9AF (under groundwater) in Appendix A relates to existing groundwater bores in the vicinity of the proposal. Details on the bores should be provided.

Preliminary Construction Environmental Management Plan

Table 2.2 in the Preliminary CEMP should be amended to specifically include for the work period - B Site preparation activities to not only undertake vegetation clearance but to:

- relocate native plants from areas that are to be permanently cleared and transplant them into the riparian areas/conservation area identified for rehabilitation
- collect topsoil (and seedbank) from native vegetation areas that are to be permanently cleared and to use this in the revegetation of riparian areas (see Appendix I, Volume 3).

Table 3.1 - Revised Environmental Management Measures

The Revised Environmental Management Measures (REMMs) in Table 3.1 for Biodiversity states that *“before construction detailed flora and fauna mitigation measures would be developed and presented as part of the CEMP”* and that the CEMP would address REMM 6E, which includes the collection of topsoil (and seedbank) and the relocation of native plants to the riparian areas identified for rehabilitation (page 21). Clarification is required as to whether these REMMs are to be undertaken during the construction phase or pre construction as part of the site preparation activities.

REMM (6X) in Table 3.1 for Biodiversity states “ongoing monitoring of macroinvertebrates communities will be undertaken prior to, during and following construction” but the column for the Implementation Phase only indicates that the monitoring is to occur during pre-construction and construction. The implementation phase in the REMM needs to be amended to include post construction/operation phase.

Table 3.2 – Final Compilation of Mitigation Measures

REMM (0B) in Table 3.2 needs to be amended to include that as a minimum the CEMP for the proposal will include a Flora and Fauna Management Plan and a Groundwater Monitoring Program (page 37).

REMM (0C) in Table 3.2 needs to be amended to include that as a minimum the Operational Environmental Management Plan (OEMP) for the proposal will include a Flora and Fauna Management Plan (pages 37-38).

REMM (4F) in Table 3.2 indicates the collection of topsoil (and seedbank) and the relocation of native plants to the riparian areas for rehabilitation will be undertaken during construction. Clarification is required as to whether these REMMs are to be undertaken during construction or pre construction as part of the site preparation activities. The topsoil areas to be collected; the areas of remnant native vegetation to be translocated and the riparian areas to be rehabilitated need to be identified in a scaled plan in the FFMP.

REMM (8B) in Table 3.2 indicates landscaping for the proposal will include use of species that are local to the area and use of seeds collected within the local area for planting (page 57). These mitigation measures are supported especially for any landscaping that is undertaken adjacent to, or in close proximity to the riparian corridor/ conservation area along the Georges River.

Table 8.1 – Monitoring Requirements

Table 8.1 should be amended to include the monitoring and maintenance of the riparian corridor/ conservation area that are re-vegetated and rehabilitated (page 93).

Table 8.1 should be amended to include groundwater monitoring (pages 93-94).

End Attachment A