



OUT16/31704

Ms Kate Masters  
Industry Assessments  
NSW Department of Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001

Kate.masters@planning.nsw.gov.au

Dear Ms Masters

**Benedict Smeaton Grange Resource Recovery Facility (SSD 7424)  
Comment on the Environmental Impact Statement**

I refer to your email dated 13 July 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 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](mailto:landuse.enquiries@dpi.nsw.gov.au).

The Department has reviewed the Environmental Impact Statement (EIS) and provides the following recommendations:

- It is unclear how excavation into the alluvium will be avoided (Appendix H). Insufficient supporting information has been provided to assess this. It is recommended the proponent provides additional information including:
  - a geological map which differentiates the alluvium and the residual soil boundary at the site
  - the location and details of the monitoring bores
- The proponent should amend Table 7.1 on page 80 of the EIS to include the following mitigation measure:
  - excavation into the alluvium on the site is to be avoided, where feasible.
- Should excavation intercept groundwater at the subject site, and there is a requirement to extract groundwater or to dewater, including any ongoing take of groundwater, then DPI Water needs to be advised and a licence may be required.
- According to Section 6.5.3 of the EIS and Appendix B of Appendix G, the proponent intends to capture clean roof water in the sediment control basin. The proponent may want to consider collecting rainwater in a dedicated rainwater tank instead of the sediment basin as this will not require consideration for licensing. If this water is collected in the sediment dam, then the proponent may require a water access licence if the volumes are in excess of the maximum harvestable right for the property.

- The Ground Floor Plan (Appendix C of the EIS) shows a 4 m high and a 10 m high fence is located beyond the site boundary within the riparian corridor of Kenny Creek. The proponent should clarify whether the fence is an existing structure, or if the fence is to form part of the SSD project. If so, details are required as to why the fence is located within the riparian corridor and not along the site boundary.

For further information please contact Janne Grose, Water Regulation Officer at DPI Water (Parramatta office) on t: (02) 8838 7505 ; e: [janne.grose@dpi.nsw.gov.au](mailto:janne.grose@dpi.nsw.gov.au).

Yours sincerely



Mitchell Isaacs  
**Director, Planning Policy & Assessment Advice**  
26 August 2016