

23 October 2019

Contact: *Jim Caddey*
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Our ref: *D2019/110349*

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Industry Assessments
NSW Department of Planning Environment & Industry
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Thank you for your email received 23 September 2019 seeking WaterNSW's comments on Goulburn Poultry Processing Mixed Use development (SSD 9143). WaterNSW appreciates the opportunity to provide detailed comments on this proposal.

The proposed development is located within the declared Sydney Catchment area. A legislative function of Water NSW is to protect and enhance the quality and quantity of water in this catchment.

WaterNSW has reviewed the Environmental Impact Statement prepared by KDC (dated 1 August 2019) and undertaken a site visit. WaterNSW has the following concerns regarding the water quality impacts from this application:

- The proposal does not incorporate all WaterNSW's Current Recommended Practices (CRPs), or demonstrate how the outcomes of those CRPs will be met, as required by Clause 9 of the SEPP (Sydney Drinking Water Catchment) 2011. In particular, Water NSW notes that:
 - Staging has not been considered in the MUSIC stormwater quality modelling or the erosion and sediment control documentation, and
 - the MUSIC stormwater quality model has not been prepared in accordance with the CRP *Using MUSIC in Sydney Drinking Water Catchment* (WaterNSW 2019).
- Consequently, it cannot be determined whether Stage 1 has a neutral or beneficial effect (NorBE) on water quality.
- Further, when WaterNSW amended the MUSIC stormwater quality model to meet the CRP requirements, the final proposal would not comply with the NorBE test on water quality.

Notwithstanding the concerns listed above, WaterNSW considers that the project may achieve NorBE, subject to the provision of additional information, including:

- the quantity of wastewater that would be produced in Stage 1
- the management of washdown water from the proposed truck maintenance facility
- whether there is enough space on-site for both the proposed Moving Bed Biological Reactor (MRRB) tank and stormwater detention basin
- MUSIC stormwater quality model that meet the requirements of the relevant CRP, and
- a soil and water management plan showing how the proposed bioretention system will be protected during the construction of Stage 2 of the proposal.

In that regard, WaterNSW requests that the following documents be updated in consultation with WaterNSW:

- the Water Management Plan
- the Civil Works Plans, and
- the Overall Site Plan.

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

If you wish to discuss the matter further, please contact Jim Caddey on 4824 3401 or email at environmental.assessment@waternsw.com.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Clay Preshaw'. The signature is fluid and cursive, with the first name 'Clay' being more prominent and the last name 'Preshaw' following in a similar style.

CLAY PRESRAW
Manager Catchment Protection