

Robert A Byrne

From: Wayne Jones <wayne.jones@dpi.nsw.gov.au>
Sent: Tuesday, 29 July 2014 10:14 AM
To: Robert A Byrne
Subject: Blayney Smallstock Abattoir Development - SEARs

Hi Robert

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

Regards
Wayne

Wayne Jones | Land Use Planning Coordinating Officer
Department of Primary Industries
Level 48, MLC Centre, 19 Martin Place Sydney NSW 2000
T:02 9338 6708 | E: wayne.jones@dpi.nsw.gov.au

OUT14/22604

Mr Robert Byrne
Industry, Key Sites and Social Projects
NSW Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Robert.Byrne@planning.nsw.gov.au

Dear Mr Byrne,

Blayney Smallstock Abattoir Development Request for input into Secretary's Environmental Assessment Requirements

I refer to your email dated 17 July 2014 to the Department of Primary Industries in respect to the above matter.

Comment by Crown Lands

Crown Lands recommend that the following be included in the Environmental Assessment report;

- A full description of the likely impacts of the development on the Belubula River and the necessary mitigation measures to ensure negligible impacts.

For further information please contact Kay Oxley, Senior Natural Resource Management Officer (Orange office) on 6391 4300, or at: kay.oxley@crownland.nsw.gov.au.

Comment by Agriculture NSW

Agriculture NSW recommends the following be included in the EIS;

- Analysis of the effluent and waste from the handling of livestock be undertaken, and that its management be described,
- On site water requirements also be shown, including water storages, diversions etc,
- Animal welfare also be described with reference to current animal welfare standards,
- Future expansion potential be reviewed.

For further information contact Mary Kovac, Resource Management Officer (Dubbo Office) on 6881 1250 or at mary.kovac@industry.nsw.gov.au.

Comment by NSW Office of Water

The NSW Office of Water (Office of Water) has reviewed the Supporting documentation accompanying the request for Secretary's Environmental Assessment Requirements and provides the following comments, and further detail in Attachment A.

It is recommended that the EIS be required to include:

- Details of an adequate and secure water supply for the proposal and confirmation of the ability to access water from the local town water supply without impacting the town's requirements.
- Assessment of any water licensing requirements.
- Assessment of impacts on surface and ground water sources (both quality and quantity), watercourses, riparian land, and groundwater dependent ecosystems.
- Proposed water management on the site based on a detailed site water balance. This is to also include a conceptual surface water management plan to identify the existing and proposed surface water management structures and flow paths.
- An assessment of any proposed modification to surface water management including modelling of redistribution of waters and an assessment of impact on neighbouring properties and the associated watercourse and floodplain.
- An impact assessment of any proposed works within or adjacent to watercourses and adequate assessment of buffer requirements. This will require design and assessment to ensure effective riparian stability and functioning can be achieved in terms of ecological, geomorphological and hydrological aspects. Ability to achieve the principles of the *Water Management Act 2000* and the requirements of the Guidelines for Controlled Activities on Waterfront Land will be required. NOW advises the proposed development is located on or adjacent to a third order watercourse and is within 500m of the Belubula River which is a sixth order watercourse.
- An impact assessment of construction and operation of the proposed on-site wastewater treatment system and any other waste to be managed on-site.
- Adequate mitigating and monitoring requirements to address surface water, groundwater and riparian impacts.
- Consideration of relevant policies and guidelines.
- A statement of where each element of the SEARs is addressed in the EIS (i.e. in the form of a table).

For further information please contact Tim Baker, Senior Water Regulation Officer (Dubbo Office) on 6841 7403 or at tim.baker@water.nsw.gov.au.

Attachment A

Blayney Smallstock Abattoir Development Request for Input into Secretary's Environmental Assessment Requirements Additional Comment by NSW Office of Water

Relevant Legislation

The Environmental Impact Statement (EIS) should take into account the objects and regulatory requirements of the *Water Act 1912* and *Water Management Act 2000* (WMA 2000), as applicable. Proposals and management plans should be consistent with the Objects (s.3) and Water Management Principles (s.5) of the *WMA 2000*.

Water Sharing Plans

The proposal is located within the area covered by the Water Sharing Plan (WSP) for the Lachlan Unregulated and Alluvial Water Sources and the Water Sharing Plan for the NSW Murray Darling Basin Fractured Rock Groundwater Sources. The EIS is required to:

- Demonstrate how the proposal is consistent with the relevant rules of the WSP including rules for access licences, distance restrictions for water supply works and rules for the management of local impacts in respect of surface water and groundwater sources, ecosystem protection, water quality and surface-groundwater connectivity.
- Provide a description of any site water use (amount of water from each water source) and management including all sediment dams, clear water diversion structures with detail on the location, design specifications and storage capacities for all the existing and proposed water management structures.
- Provide an analysis of the proposed water supply arrangements against the rules for access licences and other applicable requirements of any relevant WSP.
- Provide a detailed and consolidated site water balance.

Relevant Policies and Guidelines

The EIS should take into account the following policies (as applicable):

- Guidelines for Controlled Activities on Waterfront Land (2012);
 - Aquifer Interference Policy (2012);
- NSW State Rivers and Estuary Policy (1993);
- NSW State Groundwater Policy Framework Document (1997);
- NSW State Groundwater Quality Protection Policy (1998);
- NSW State Groundwater Dependent Ecosystems Policy (2002); and
- Department of Primary Industries Risk Assessment Guidelines for Groundwater Dependent Ecosystems (2012);
 - NSW Water Extraction Monitoring Policy (2007);
- Australian Groundwater Monitoring Guidelines (2012).

<http://www.water.nsw.gov.au/Water-management/Law-and-policy/Key-policies/default.aspx>

<http://www.water.nsw.gov.au/Water-licensing/Approvals?Controlled-activities/default.aspx>

The EIS needs to demonstrate the proposal is consistent with the spirit and principles of these policy documents.

Licensing Considerations

The EIS is required to provide:

- Details of the water supply source(s) for the proposal including any proposed surface water and groundwater extraction from each water source as defined in the relevant Water Sharing Plan/s and all water supply works to take water.
- Information on the purpose, location, construction and expected annual extraction volumes including details on all existing and proposed water supply works which take surface water, (pumps, dams, diversions, etc).
- Details on all bores and excavations for the purpose of investigation, extraction, dewatering, testing and monitoring. All predicted groundwater take must be accounted for through adequate licensing.
- Details on existing dams/storages (including the date of construction, location, purpose, size and capacity) and any proposal to change the purpose of existing dams/storages.
- Details on the location, purpose, size and capacity of any new proposed dams/storages.

Water allocation account management rules, total daily extraction limits and rules governing environmental protection and access licence dealings also need to be considered.

The Harvestable Right gives landholders the right to capture and use for any purpose 10 % of the average annual runoff from their property. The Harvestable Right has been defined in terms of an equivalent dam capacity called the Maximum Harvestable Right Dam Capacity (MHRDC). The MHRDC is determined by the area of the property (in hectares) and a site-specific run-off factor. The MHRDC includes the capacity of all existing dams on the property that do not have a current water licence. Storages capturing up to the harvestable right capacity are not required to be licensed but any capacity of the total of all storages/dams on the property greater than the MHRDC may require a licence.

For more information on Harvestable Right dams:

<http://www.water.nsw.gov.au/Water-licensing/Basic-water-rights/Harvesting-runoff/Harvesting-runoff>

Groundwater Assessment

To ensure the sustainable and integrated management of groundwater sources, the EIS needs to include adequate details to assess the impact of the project on all groundwater sources including:

- The predicted highest groundwater table at the site.
- Works likely to intercept, connect with or infiltrate the groundwater sources.
- Any proposed groundwater extraction, including purpose, location and construction details of all proposed bores and expected annual extraction volumes.
- A description of the flow directions and rates and physical and chemical characteristics of the groundwater source.
- The predicted impacts of any final landform on the groundwater regime.
- The existing groundwater users within the area (including the environment), any potential impacts on these users and safeguard measures to mitigate impacts.
- An assessment of the quality of the groundwater for the local groundwater catchment.
- An assessment of groundwater contamination (considering both the impacts of the proposal on groundwater contamination and the impacts of contamination on the proposal).
- Measures proposed to protect groundwater quality, both in the short and long term.

- Measures for preventing groundwater pollution so that remediation is not required.
- Protective measures for any groundwater dependent ecosystems (GDEs).
- Proposed methods of the disposal of waste water and approval from the relevant authority.
- The results of any models or predictive tools used.

Where potential impact/s are identified the assessment will need to identify limits to the level of impact and contingency measures that would remediate, reduce or manage potential impacts to the existing groundwater resource and any dependent groundwater environment or water users, including information on:

- Any proposed monitoring programs, including water levels and quality data.
- Reporting procedures for any monitoring program including mechanism for transfer of information.
- An assessment of any groundwater source/aquifer that may be sterilised from future use as a water supply as a consequence of the proposal.
 - Identification of any nominal thresholds as to the level of impact beyond which remedial measures or contingency plans would be initiated (this may entail water level triggers or a beneficial use category).
 - Description of the remedial measures or contingency plans proposed.
 - Any funding assurances covering the anticipated post development maintenance cost, for example on-going groundwater monitoring for the nominated period.

Groundwater Dependent Ecosystems

It is suggested the EIS considers the potential impacts on any Groundwater Dependent Ecosystems (GDEs) at the site and in the vicinity of the site and:

- Identify any potential impacts on GDEs as a result of the proposal including:
 - the effect of the proposal on the recharge to groundwater systems;
 - the potential to adversely affect the water quality of the underlying groundwater system and adjoining groundwater systems in hydraulic connections; and
 - the effect on the function of GDEs (habitat, groundwater levels, connectivity).
- Provide safeguard measures for any GDEs.

Watercourse and Riparian Land

The EIS should consider the Guidelines for Controlled Activities on Waterfront Land (2012).

The EIS should address the potential impacts of the project on all watercourses likely to be affected by the project, existing riparian vegetation and the rehabilitation of riparian land. It is recommended the EIS provides details on all watercourses potentially affected by the proposal, including:

- Scaled plans showing the location of:
 - watercourses and top of bank;
 - riparian corridors widths to be established along the creeks;
 - existing riparian vegetation surrounding the watercourses (identify any areas to be protected and any riparian vegetation proposed to be removed);
 - the site boundary, the footprint of the proposal in relation to the watercourses and riparian areas; and
 - proposed location of any asset protection zones.
- Photographs of the watercourses.
- A detailed description of all potential impacts on the watercourses/riparian land.
- A description of the design features and measures to be incorporated to mitigate potential impacts.
- Geomorphic and hydrological assessment of water courses including details of stream order (Strahler System), river style and energy regimes both in channel and on adjacent floodplains.

End Attachment A

Regards
Wayne

Wayne Jones | Land Use Planning Coordinating Officer
Department of Primary Industries
Level 48, MLC Centre, 19 Martin Place Sydney NSW 2000
T:02 9338 6708 | E: wayne.jones@dpi.nsw.gov.au

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