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West Nowra landfill Expansion (SSD-7187) Response to Submissions

Dear Liz

I refer to your letter dated 4th September 2019 regarding West Nowra landfill Expansion (SSD-7187) (Shoalhaven City) EIS Exhibition. The proposal has now progress to the Response to Submission stage (RtS) and the proponent is in the process of finalising the RtS report. Due to an administrative error, the RtS was substantially progressed when your submission received. As such, the issues raised within your submission have been addressed separately through this letter, which will be appended to the final RtS. A response to each of the comments made within the submission is provided below.

DPIE – Water and the NSW Natural Resources Access Regulator (NRAR)

Submission

The ongoing monitoring and reporting requirements should assess for the risk of hydrostatic pressure beneath the liner. A contingency response plan should be developed to manage this risk should groundwater levels rise above a nominated threshold(s).

Response

To manage the risk of hydrostatic pressure affecting the landfill liner, the EIS provided a commitment to confirm depths to groundwater as part of the detailed design stage to ensure the design complies with EPA Victoria Best Practice Environmental Management (BPEM) – Siting, design, operation and rehabilitation of landfills (Victorian Guidelines) (EPA Victoria, 2014). Specifically the requirement for the basal liner to be greater than two metres above the average groundwater level.

A detailed review of groundwater elevations at the site has been brought forward and has been undertaken as part of this RtS. The review included:

- Compilation of water level data for all monitoring bores assessed as targeting the water table aquifer
- Review of water level data in conjunction with rainfall data for the area to determine if seasonal fluctuations exist, and if so determine the magnitude of these fluctuations
- Calculation of summary statistics for groundwater elevations, i.e. maximum, minimum and average groundwater elevations

- Establishment of groundwater buffer distance based on the findings of the review to inform the detailed design.

The result of the detailed groundwater review would inform the development of the detailed design to ensure the basal liner is sufficiently above the average depth to groundwater (at least 2 metres) and avoids risks associated with maximum groundwater depths. A review of groundwater levels in relation to climatic trends show that fluctuations have been minimal and levels are considered unlikely to rise above the maximum elevation recorded to date.

Given this, it is considered unlikely that hydrostatic pressure would impact the landfill liner. However, the LEMP (2019) developed for the Proposal would be updated to include monitoring and reporting relating to groundwater levels and provide contingency response measures to manage potential risks relating to hydrostatic pressure in the unlikely event that groundwater levels rise above a nominated threshold(s)

DPI – Agriculture

Submission

It is noted that the proposed development is immediately adjacent to land used for agricultural purposes. There are a range of potential biosecurity and amenity issues that landfill developments can pose on agriculture.

The proponent should refer to and adopt the suggested management measures outlined in the DPI Agriculture Prime fact titled *Agricultural Issues for Landfill Developments* - <https://www.dpi.nsw.gov.au/agriculture/lup/development-assessment2/landfill-developments>

Response

As described in Section 8.1.1 (Strategic land use planning) of the EIS, the area immediately surrounding the West Nowra Recycling and Waste Facility comprises areas of undeveloped bushland to the north, east and west. The area directly to the south of the Proposal Site comprises rural residential properties zoned RU2 Rural Landscape. In accordance with the Shoalhaven Local Environmental Plan 2014, RU2 zoning allows for 'Extensive Agriculture' land uses without consent including cropping, grazing of livestock etc.

Given the proximity to land that could be utilised for agricultural activities, the 2019 LEMP would be reviewed and the management measures suggested in the DPI Agriculture Prime fact sheet titled *Agricultural Issues for Landfill Developments* would be considered for inclusion as applicable.

Yours sincerely



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