



Office of Water

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Our ref : ER21304
Your ref: MP10_0127 & 10_0128

Attention: Haley Rich

Dear Mr Ritchie

**MP10_0127 & 10_0128 – Jacfin Ropes Creek Industrial Estate - Environmental
Assessment – Blacktown Local Government Area**

Thank you for your letter of 12 November 2010 seeking comment from the NSW Office of Water (NOW) on the Environmental Assessment (EA) for the above major project proposal.

NOW's issues are outlined in Attachment A.

Contact Details

Should you have any queries in relation to this matter please contact Janne Grose on telephone (02) 4729 8262.

Yours sincerely

Mark Mignanelli
Manager Major Projects and Assessment

NSW Office of Water Comments
Jacfin Ropes Creek Industrial Estate
Environmental Assessment

Section 2.4 of the Stormwater Assessment and Management Plan indicates that the Growth Centres Development Code has been applied to the site and the riparian corridors section (B3) of the Development Code is relevant. The figures in the Environmental Assessment (EA) show that the stream category width along the northern tributary has been amended from the Department's initial desk top mapping from a Category 1 watercourse to a Category 2 watercourse. As the northern tributary is no longer to provide an environmental corridor linkage the NSW Office of Water (NOW) agrees with the amended categorisation.

Section 2.6 of the EA notes the Ropes Creek riparian corridor forms an E2 Conservation Zone along the western boundary of the site. The NOW supports zoning the Ropes Creek riparian corridor as E2, as this creek forms an important environmental corridor linkage. The NOW also supports the proposed zoning of the northern and southern tributaries as E2 (see Figure 34 in the EA). The zoning of the southern tributary as E2 is consistent with the E2 zoning of this creek on the adjacent Oakdale Central site.

The Ecological Issues and Assessment report (Section 4.4) notes that the inclusion of the drainage lines in areas zoned E2 is not justified on ecological grounds. The report however needs to give consideration to the regional landscape and how these creeks/riparian areas are intended to function in the future once the creeks have been rehabilitated and the riparian areas are fully rehabilitated with native vegetation rather than focus on their current degraded state. As noted above the E2 zoning of the southern tributary is consistent with the adjacent Oakdale Central site (the Concept Plan for Oakdale Central site zones this creek and riparian area as E2).

Section 6.3.2 of the EA indicates the Ropes Creek Corridor has been separated into a single lot so that the corridor can be managed and maintained by one entity. The NOW supports this approach. If possible, it is recommended the east-west E2 zoned land is also managed and maintained by one entity rather than contained within the development lots and the responsibility of the relevant land owner. The NOW has found that once riparian land has been rehabilitated by a developer and then goes into private ownership it can be cleared and mown by individual landholders.

The NOW supports the proposed rehabilitation of the Ropes Creek Corridor (see Section 6.12, page 76 and Section 6.17, page 82). It is recommended the two tributary creeks are rehabilitated (where required) to mimic naturalised systems and the riparian land along the tributaries is also rehabilitated. It is noted in Section 6.8 of the EA (page 66) that the tributary at the proposed location of Local Road 1 is highly modified and degraded and has steep eroding banks. The Ropes Creek Heritage Assessment report also indicates the northern tributary is heavily eroded along much of its length. NOW recommends the stream banks are rehabilitated using a naturalised solution. The rehabilitation of riparian land along Ropes Creek and the southern and northern tributaries should emulate the

local vegetation community.

The planting principles in the Site Development Guidelines recommend the landscaping directly adjacent to the E2 Conservation zone should not include any species nominated for the E2 corridor so as to clearly delineate the boundary of the E2 Corridor. The NOW recommends:

- a suitable management edge be provided to clearly distinguish between the landscape area and the E2 zone (such as bollards or a pathway etc).
- the landscaped areas complement and be consistent with the plantings in the E2 zone and consist of native species endemic to the local community so as to further improve biodiversity values.

The NOW supports the proposed locating of the basins outside the riparian land (see Figure 39). Stormwater is an urban impact and should be dealt with in the development footprint and not transferred to the riparian environmental footprint. Locating the basins outside the riparian area will assist to limit disturbing the function and value of riparian land.

It is noted in Section 6.9 of the EA that the Asset Protection Zones / Defendable Space setbacks are measured from the edge of the E2 zone and do not encroach upon the environmental conservation land (page 68). The NOW supports the proposed locating of the APZ/defendable space setbacks outside the riparian land/ E2 zone. The NOW supports the provision of a perimeter trail outside the E2 zone to provide access to bushfire prone vegetation in the E2 Environmental Conservation corridor.

Road crossings of the northern and southern tributaries should be consistent with what is currently proposed on the adjoining Oakdale site and provide for terrestrial and aquatic fauna movement.

Groundwater

Section 6.5 of the EA indicates that groundwater was encountered in all boreholes during testing between levels of 2.1 m below ground level (mbgl) and 5.3 mbgl and that it is expected that groundwater will be encountered in excavations below 2mbgl. Clarification is required as to whether basement carparks are proposed and if the proposal will require dewatering?

If the proposal is likely to intercept groundwater, a licence may be required from the NOW under Part 5 of the Water Act 1912 in relation to this development. The NOW will assess the need for a water license once more detailed project information is available and provided to the NOW.

The need for a water license should be discussed with the NOW and the applicant should be advised to contact Mr Wayne Connors on telephone number 9895 7194 to discuss any water licensing queries.

Statement of Commitments

NOW recommends the Statement of Commitments include:

- the proposal will rehabilitate the watercourses on site (where required) to mimic naturalised systems;
- the proposal will rehabilitate a minimum 50 m wide riparian corridor (measured from top of bank) along either side of Ropes Creek to emulate the local vegetation community
- the proposal will rehabilitate a minimum 30 m wide riparian corridor (measured from top of bank) along either side of the northern tributary to emulate the local vegetation community.
- the proposal will rehabilitate a minimum 30 m wide riparian corridor (measured from top of bank) along either side of the southern tributary to emulate the local vegetation community.

**End Attachment A
17 December 2010**