



Our reference: ECM: 9956067
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Department of Planning, Industry and Environment
Attn: Nathan Heath

Email: nathan.heath@planning.nsw.gov.au

Dear Nathan,

Review of Amended Report – SSI-8609189 Upper South Creek Advanced Water Recycling Centre

Thank you for providing Council with another opportunity to comment on the proposed State Significant Infrastructure (**SSI**) application.

Council notes that the original Environmental Impact Statement (**EIS**) was publicly exhibited from 21 October to 17 November 2021 in relation to Sydney Water's proposal for the Upper South Creek Advanced Water Recycling Centre (**AWRC**).

Penrith City Council has provided a submission to the Department on the proposal under cover letter dated 14 December 2021.

The Applicant has now prepared the Upper South Creek Advanced Water Recycling Centre Amendment Report dated March 2022. The Amendment Report includes the following attachments:

- An Amended Project Description,
- A Biodiversity Assessment,
- An Aboriginal Heritage Assessment,
- A Noise and Vibration Assessment, and
- A Traffic and Transport Assessment.

Council understands that the proposed amendments include minor realignments of the treated water pipeline and to the proposed brine pipeline and a change to the AWRC site boundary.

All impacts are stated to only apply to the construction phases, and it is also clarified in the Amended Report, that where additional impacts occur, they are minor and do not change the significance of impacts assessed in the EIS and that none of these amendments directly impact any additional landowners beyond those already impacted by the project described in the EIS.

It is noted that the Amendment Report and attached documents are an amendment to the proposal and are not a Response to Submissions package, which is forthcoming.

Council raises no objection to the amendment to the proposal although takes this opportunity to reiterate that some aspects of the scope of works proposed to be included in Stage 1 remain unclear as detailed further below.

1. Renewable energy generation infrastructure

In its submission dated 14 December 2021, Penrith City Council noted support is provided for the inclusion of the production of renewable energy generation infrastructure including generation of renewable energy from co-generation and operation of solar photovoltaic panels and supported the inclusion of these activities, as an offset to carbon emissions produced as a result of the construction of the project (as is noted in the EIS, Volume 1 (V1), p.51).

It is not clear if this aspect of the proposal has been removed from the scope of works, as the inclusion of the production of renewable energy generation infrastructure including the generation of renewable energy and operation of solar panels, is no longer included in the project description provided in the Amendment Report.

Recommendation 1

It is recommended that the Department seek clarity on the scope of works for each Stage and that stakeholders and submitters be made aware of this finalised scope, and are provided with opportunity to comment, prior to determination of the application.

2. Treated Water Re-use

The original EIS includes that the proposal will utilise treated water from the AWRC for agriculture and business/commercial purposes, in place of potable/drinking water.

The EIS does not clarify whether this re-use option is included in the scope of Stage 1 works and activities. There are several instances within the EIS which state that these activities are included and others where this activity is a future option or is a potential (example EIS, Volume 2 (V2), p.51 and EIS, V2, p.87 3.5.1).

Recommendation 2

It is recommended that the Department seek clarity from Sydney Water as to the full scope of works and activities proposed as part of Stage 1. There is no mention of this aspect of the proposal in the project description (p.13) of the Amendment Report.

3. Green Space and Landscaping

Council's original submission noted support for the delivery of a new green space area around the AWRC adjacent to South Creek and Kemps Creek which is identified to be included in the scope of Stage 1 works, and which will contribute to the development of a green spine through Western Sydney including water sensitive urban design and landscaping for visual screening.

Limited detail has been provided on the landscaping and design of this area and it is unclear if the delivery of this green space will achieve the outcomes and desired high quality expressed within the EIS.

No detail is provided as to the water sensitive urban design elements which were identified within the EIS to be employed. It is unclear as to whether this green space will be publicly accessible on delivery, as part of Stage 1.

Recommendation 3

It is recommended that the Department seek clarity from the applicant as to the scope of all Stages. It is also recommended that more details plans should be provided to the Department to inform the assessment.

4. Key Opportunities

Council raised in its submission that Sydney Water be encouraged to include the water re-use 'key opportunity' in the Stage 1 scope. Currently this aspect is identified as being outside the project scope (EIS, V1, p.9).

This 'key opportunity' included that the recycled water produced can be used by industry and agriculture and may be used to complement stormwater in irrigating open spaces (this is also identified elsewhere within the EIS as being within the scope of Stage 1).

There is no mention of this aspect of the proposal or any of the 'key opportunities' in the amended project description (p.13) of the newly submitted Amendment Report.

Recommendation 4

It is recommended that the Department seek clarity of the full scope of Stage 1 and that this detail be made available to stakeholders and submitters.

5. Bioenergy Hub

The inclusion of a Bioenergy Hub being another 'key opportunity' was identified in the EIS (V1, p.9). This was explained to be related to waste collection, reuse, resource recovery and renewable energy generation.

Details of possible waste streams and related environmental and operational impacts are not provided, and Council has previously raised that this aspect of the project is not supported.

Recommendation 5

As the 'key opportunities' are not included in the description of the project provided in the Amendment Report, it is assumed these no longer form part of the scope although it is recommended that the Department seek clarity.



Should you require any further information regarding the comments, please contact me on (02) 4732 8567.

Yours Sincerely,

Kathryn Saunders
Principal Planner