

8 March 2022

218611

William Hodgkinson
Team Leader – Industry Assessments
Department of Planning and Environment
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2150

Dear Mr Hodgkinson,

RESOURCE RECOVERY FACILITY, EASTERN CREEK (SSD-9774) RESPONSE TO REQUEST FOR FURTHER INFORMATION

I refer to your correspondence of 25 January 2022, where you requested further information in relation to SSD-9774, being a State Significant Development Application for a new Resource Recovery Facility, at Hanson Place, Eastern Creek.

You have requested that we provide a response to the issues raised in further submissions received from Government agencies and Blacktown City Council. In response to your request for further information, we have provided a response to each of the issues raised in the further submissions, as follows.

1.0 Sydney Water

1.1 Issues Raised

Sydney Water noted that potable water and sewer connections are available at the site, and that approval from Sydney Water to connect to these existing mains is required as part of the Construction Certificate process.

1.2 Response

Hanson will obtain approval from Sydney Water in accordance with standard procedures during the Construction Certificate process.

2.0 Environment Protection Authority

2.1 Issues Raised

The EPA has concluded its assessment and determined that it can issue an Environment Protection Licence or the proposed material recycling facility. The EPA has specified the general terms of its approval for the Licence, which include specific conditions relating to:

- Soil and water management plan, which includes, amongst other things, an unexpected finds protocol in relation to possible site contamination.
- Noise, including noise limits to apply under the Licence, and noise monitoring requirements

The EPA also notes that that sediment will be tracked by vehicles entering and exiting the recycling shed during drop-off and collection of materials. The EPA therefore recommends that a wheel wash be installed at the facility to minimise sediment tracking and dust emissions.

2.2 Response

Hanson has no objection to the EPA's general terms of approval.

In relation to the recommendation for a wheel wash, it remains Hanson's position that a wheel wash is unnecessary, for the same reasons as set out in the Response to Submissions Report. In particular, we reiterate that each vehicle will travel at least 300m on the internal road network, which will be fully sealed and maintained in good order, including by way of a street sweeper. Hanson's experience is that this approach is more than sufficient to ensure no sediment is tracked onto the public road network.

3.0 Transport for NSW

The Transport for NSW submission raises no further comments to the proposed development, and reiterates that the requirements set out in the TfNSW response, dated 15 April 2021 remain applicable. These requirements related to the provision of bicycle parking and storage area. The Response to Submissions Report included a commitment to provide four (4) bicycle parking spaces in the vicinity of the Sales Office or the Production Office. TfNSW has not indicated any specific issues in relation to this commitment, and so it is considered that there are no further issues raised in the TfNSW to address.

4.0 Heritage NSW

Heritage NSW supports the recommendation from Addendum Due Diligence Archaeological Assessment report that no further Aboriginal cultural heritage assessment is required. The recommendations of the Addendum Due Diligence Archaeological Assessment report are already included as project commitments in the mitigation measures table. As such, it is considered that there are no further issues raised by Heritage NSW to address.

5.0 Blacktown City Council

5.1 Issues Raised

Council has raised three issues:

1. **Traffic:** Council states that there is no evidence to verify that TfNSW has been consulted or that TfNSW have no issues with the operation of the Wonderland Drive / Wallgrove Road intersection.
2. **Flooding:** Council identifies concerns in relation to flow of 1% Annual Exceedance Probability flooding flows at the trapped low point at the end of Hanson Place cul-de-sac. Council requests further details of how the flow overtops the kerb or boundary and how these flows are safely collected and then directed to the swale and on to the estate wetland and detention basin. Council note that the flow width at the boundary is likely to be much larger than the 10 m wide channel. Council also notes that there is a discrepancy in the contours around the trapped in the cul-de-sac. Council therefore requests:
 - Additional survey to correctly understand the actual overtopping of the cul-de-sac and ensure the swale width is increased sufficiently to collect and direct the flow to the main design swale with freeboard and that the main building is protected.
 - Detailed hydraulic flood modelling that demonstrates the behaviour and extent of flows overtopping the cul-de-sac in a 1% AEP event. Where the modelling demonstrates that the width of flow exceeds the 10 m wide swale detail what measures are required to safely collect such flows and direct these back into the swale without adversely impacting the proposed building within the site or in particular the adjoining development at 22 Hanson Place. Show both pre and post development modelling to show no impacts on 22 Hanson Place. Where such modelling demonstrates some of this flow enters the main driveway to lots 4 and 5, detail how such flows are collected and conveyed to the estate basin to ensure no adverse impacts to the main building and operations of the site. In addition, are there safety issues for access/egress from the site down a steep driveway in such 1% AEP events and how is this addressed.

3. **Drainage:** Council raise a range of detailed matters in relation to the proposed drainage infrastructure. These matters are listed in detail in **Attachment A** as part of a detailed responses prepared by Martens.
4. **Biodiversity:** Council considers that the Biodiversity Development Assessment Report does not assess the indirect or direct impacts of the development on adjacent vegetation to the south west of the site, and requests that an assessment of the impacts of stormwater on the adjacent vegetation is required.

Response to these issues are provided below.

5.2 Response to Council's Traffic Issues

TfNSW has been consulted four times in relation to the proposed development, including twice prior to the exhibition of the EIS, as follows:

1. TfNSW was consulted in the preparation of the SEARs, and provided a letter to DPE that informed the SEARs. This correspondence forms an attachment to the SEARs, and is provided at Appendix A of the EIS.
2. Hanson consulted directly with TfNSW during the preparation of the EIS. Details of this correspondence is provided in the Consultation Outcomes Report, provided at Appendix R of the EIS.
3. TfNSW provided a formal submission upon the public exhibition of the EIS. That submission is available on the Major Projects website, and raised no issues or concerns in relation to the operation of the Wonderland Drive / Wallgrove Road intersection. See TfNSW submission here: <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=PAE-16629132%2120210415T024840.110%20GMT>.
4. TfNSW provided a further submission upon review of the Response to Submissions Report. As detailed above in Section 2 of this letter, no further issues were raised in relation to the development proposal. TfNSW again did not raise any concerns in relation to the operation of the Wonderland Drive / Wallgrove Road intersection. See TfNSW submission here: <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=PAE-33950587%2120220121T031136.699%20GMT>.

It is considered that TfNSW has been adequately consulted in the assessment of the proposed development, and that the requisite evidence of consultation has been adequately provided. Further, it is clear that TfNSW has never raised any concerns in relation to the operation of the Wonderland Drive / Wallgrove Road intersection.

5.3 Response to Council's Flooding Issues

Martens has undertaken a review of the flooding issues raised by Council, and a detailed response is provided in **Attachment A**. In summary it is highlighted that the existing cul-de-sac of Hanson Place, and the swale running along the northern boundary of Lot 5, were constructed as part of the sub-division works of the estate. This is a modern and recently completed subdivision development and the design of all infrastructure, including the stormwater drainage system, should be understood to have been undertaken to appropriate standards. It is therefore appropriate for Hanson to rely on the adequacy of the Council infrastructure in Hanson place to safely direct stormwater flows in accordance with the design concept. No modification works have been proposed on the cul-de-sac and the swale as part of the current proposal.

However, given Council's stated concerns it is proposed that detailed hydraulic modelling of the cul-de-sac and swale entry could be completed at the construction certificate (CC) stage, which would assess the extent and behaviour of any potential overtopping flow from the cul-de-sac and determine if further stormwater measures would be required to prevent this overtopping in to the Site or, if this cannot be achieved, to accommodate these flows. Should works be required within the site to manage additional upslope flows, these can be readily integrated into the on-site drainage design.

5.4 Response to Council's Drainage Issues

Martens has updated the Concept Drainage Plan and Water Cycle Management Plan (see **Attachment B**) for the proposed development. **Attachment A** provides a detailed summary of the way each individual request form

Council has been addressed. In summary, all of the design refinements requested by Council have been incorporated into the revised Concept Drainage Plan. The only matters that require further discussion are set out below.

- Hard standing of the vacant and unused area located in the middle of the site marked as ‘Equipment Storage Area’. Council considers that a compacted natural earth finish is not acceptable, and recommends that this area should have an all-weather sealed finish such as new concrete or bitumen, capable of carrying the heavy axle loads of the trucks proposed on site.
- Pit and Pipe Network and Hydraulic Modelling: Council note that the site is large and the number of pits supplied to collect the flows are insufficient. The number of inlet pits needs to be increased. The pit and pipe system need to be designed for the 5% Annual Exceedance Probability flows with the catchment 100% impervious. Council requests a DRAINS model or other hydraulic calculations to justify that the internal pit and pipe system can collect and convey the 5% AEP flows to the estate basin.

Hard Standing of the Equipment Storage Area: In relation to the first issue, Hanson has amended the proposed development to remove the ‘equipment storage area’. In reality this area is not required to serve this use, it is not operationally critical and is not a key aspect of the proposal. Further there are sufficient hard stand areas around the site for temporarily storing any equipment, plant or vehicles without needing to rely on the vacant and unused area. The vacant and unused area will be subject of a future development application in the future once Hanson decides what its highest and best use is. In the meantime the area will remain in its current state – vacant and unused. No use of this area is therefore proposed under SSD-9774.

Hydraulic Modelling of the Pit and Pipe Network: The proposed drainage design is conceptual only for the purpose of development assessment. Final design with full detailed hydraulic analysis is intended to be completed as part of the Construction Certificate. As documented in the updated Water Cycle Management Plan (see **Attachment B**) the outlet pipes have been sized to convey the 5% storm flows in accordance with Council’s requirements, and this will be confirmed via further hydraulic modelling at the Construction Certificate stage. If the number of pits needs to increase, then that can easily be included in the detailed design at that time. Any requirements for the detailed design can be addressed by way of a condition of consent.

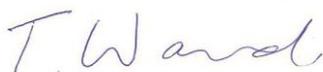
5.5 Response to Council’s Biodiversity Issues

Section 6.2.1 of the Biodiversity Development Assessment Report (provided at Appendix L of the EIS) includes a comprehensive assessment of indirect impacts of the proposed development, including identifying measures to avoid and minimise potential indirect impacts on biodiversity.

6.0 Conclusion

We trust that the information detailed in this letter is sufficient to enable you to finalise your assessment of SSD-9774. Should you have any queries about this matter, please do not hesitate to contact me.

Yours sincerely,



Tim Ward
Director
9956 6962
TWard@ethosurban.com