

Nathan Heath
Planning Officer
Department of Planning, Industry and Environment
[c/o Major Projects Planning Portal](#)

5 April 2022

Dear Mr Heath,

**COMMENTS ON THE AMENDED ENVIRONMENTAL IMPACT STATEMENT FOR THE UPPER SOUTH CREEK
ADVANCED WATER RECYCLING CENTRE PROJECT**

Thank you for the opportunity to provide comment on the amended Environmental Impact Statement (EIS) for the Upper South Creek Advanced Water Recycling Centre Project (the Project), exhibited from 23 March 2022 to 5 April 2022.

Wollondilly Shire Council provided a submission on the originally exhibited EIS in November 2021. It is understood that Sydney Water are currently preparing a Submissions Report to address submissions received during last year's EIS exhibition period. We look forward to reading this report.

The direct relevance of the Project to the Wollondilly Local Government Area is viewed as being the construction of the pipeline to the discharge point near Warragamba Dam and potential implications to the downstream ecological health from discharges as part of its operation.

Council's submission on the originally exhibited EIS identified the following key issues in regard to the Project:

- Consistency with Council's Integrated Water Policy and Water Strategy in terms of water recycling and impacts to waterways.
- Consistency with Council's Local Strategic Planning Statement and its response to growth in the area covered by the Project.
- Adequacy of mitigation measures for impacts to terrestrial and aquatic biodiversity.
- Management of impacts to surface waters during the construction and operational phase of the Project.
- Noise and vibration impacts during construction.
- Concern over the level of consultation with Aboriginal groups undertaken given the likely impact to Aboriginal heritage identified within the EIS.

Following a review of the amended documents published on the major projects portal by Council officers, the following updated comments are made in relation to the above items:

Consistency with Council's Integrated Water Policy and Water Strategy in terms of water recycling and impacts to waterways

Water Recycling Use is beyond the scope of this project, as are plans for any recycled water offtake points. At this stage, it is proposed that all of the treated wastewater will be disposed of into local waterways. Given the proposal is looking at a possibility of introducing a green space/parkland in addition to the Advanced Recycled Wastewater facility, it appears an opportunity lost not to make the most of the use of recycled water on parkland and other uses relating to surrounding development.

It is also noted in the amended project description that the environmental flows pipeline might not go ahead (further detailed in Section 3.5.1 of the EIS). This is a concern for water quality within the Warragamba River between the base of the Dam and Wallacia Weir, which will be severely impacted should environmental flows cease in this area.

Noise and vibration impacts during construction

Appendix D Noise and Vibration Assessment only addresses the Northern Road Crossing alignment and Bartley Street realignment. No other changes are proposed at this stage to address Council's previous concerns outlined below:

- It is noted in the Noise and Vibration Impact Assessment that drilling is intended to take place along C1 Warragamba River and C2 Bents Basin Road, residential receivers, for the environmental flows pipeline. Noise is expected to be in exceedance of the NMLs for 24/7 drilling construction works at both of these areas, for a period of 6 months.
- Recommendations include a Construction Noise and Vibration Management Plan, hoarding enclosures and possible alternative accommodation for out-of-hours construction works.

Council raise concerns relating to the potential noise impacts at these receivers and, where possible, works should be carried out within daylight hours only.

Adequacy of mitigation measures for impacts to terrestrial and aquatic biodiversity

Issues raised on terrestrial and aquatic biodiversity in Council's original submission were addressed in detail by the EIS, apart from issues with the applicable Koala State Environmental Planning Policy (SEPP) which it did not mention. That being that neither the Koala SEPP 2020 nor the Koala SEPP 2021 applies to developments assessed under Part 5 of the NSW *Environmental Planning and Assessment Act 1979*, therefore, further consideration of impacts to koala is not required. However, based on the date of publication of the SEARs (January 2021), the Koala SEPP 44 would be applicable based on legal advice received by Council and may require additional consideration of koala habitat.

Council would appreciate a meeting with Sydney Water to discuss the matters raised. The timing of this meeting would preferably be before the release of the Submissions Report.

General comment

Council's comments in relation to the amended EIS and the originally exhibited EIS are specifically directed at the South Creek Project of relevance to the Wollondilly LGA and applicable Council responsibilities. However, the Department of Planning and Environment is requested to note and provide an appropriate response to the following views of Council expressed in a range of representations to Sydney Water senior management, including the Briefing regarding the Upper South Creek Project:

- The Upper South Creek Project is being planned, delivered and accelerated at a significantly higher level than other development already occurring at the Wilton Priority Growth Area without any commitment for a similar type of scheme detailed in the EIS commitment.
- There is considered inconsistencies with nutrient loads and impacts on waterways with the Project in comparison to loads and restrictions applied to Picton treatment plant (which is currently at capacity). A level of concurrency and transparency in the framework applying to the South Creek Catchment and other areas covered by the Western City District Plan is viewed as needed.

Please contact Council's Environmental Services Team Leader, Bianca Klein, on 4677 9601 or via e-mail bianca.klein@wollondilly.nsw.gov.au for any enquiries.

Yours faithfully



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Director
INFRASTRUCTURE AND ENVIRONMENT