

DH:DH: 2567#118

Major Project Assessment
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

2 February 2015

Dear Sir/Madam

PICTON SEWERAGE SCHEME MODIFICATION -4

The implementation of measures to increase the level of sewage connection to properties within the Wollondilly Local Government Area is supported by Council. The proposed modifications to the Picton Water Recycling Plant are therefore recognised by Council as being in the public interest.

Council views the assessment of potential impacts and community consultation associated with the proposed modifications as being consistent with its core statutory responsibilities. In this regard, the approach adopted by Sydney Water in lodging the application would appear to be in accordance with the current State legislative and policy framework. However, the DP&E is requested to note Council's adopted position that the community deserves to be assured and shown that the level of independent scrutiny and decision-making is similar for both 'State Significant Developments' and Developments where Council is the Determining Authority.

A review has identified that the assessment of potential impacts of each component of the works and associated mitigation works by the EA are broadly adequate. The conclusion of the EA that the modification proposal can be managed to meet appropriate environmental performance requirements is therefore broadly supported. This submission consequently does not request any specific amendments to the EA. However, the following comments in regard to aspects of the Project relevant to Council's core responsibilities are provided for information and response by the DP&E.

(i) Traffic management

Council's Traffic Engineer has expressed general satisfaction at the description of traffic movements and proposed traffic management measures within the EA. However, this Engineer has requested clarification over the timeframe of the 52 construction vehicle movements stated on Page 81 of the EA. The Officer also requested that traffic monitoring data collected by Sydney Water be forwarded to Council for its records. The DP&E is consequently requested to arrange for the provision of this information to Council as a high priority.

The EA is noted to state on Page 82 that "if required, a traffic control plan would be prepared in consultation with the relevant traffic authority's". Please be advised that Council is unlikely to require such a Plan due to the low level of predicted increase in traffic movement. However, an accurate determination will be made following clarification of increased construction traffic movements referred to above.

(ii) *Treated effluent discharge management*

The EA is noted to state on Page 40 that Sydney Water is "investigating longer term options to manage and/or reuse the additional effluent produced as a result of the amplified plant". The EA is also noted to state that the identified preferred option will be the subject of a separate assessment process. The need for modification works to be completed to receive sewage as part of the Bargo/Buxton Sewerage Scheme is recognised. However, it is the preference of Council Officers for this assessment to be incorporated into the EA based on the considered view that irrigation of treated effluent is an integral component of the Modification Works.

Council is of the view that any irrigation must have a neutral or beneficial effect on groundwaters and receiving watercourses. Council would consequently oppose any level of irrigation that exceeds the capacity of the site from a hydrogeological perspective. It is noted with concern in this regard that changes to the current precautionary discharge arrangement is being considered by Sydney Water as a consequence of the forecasted exceedance in the capacity of the current effluent management system between July 2015 and February 2016. **It is therefore requested that the DP&E require Sydney Water to explore short-term options that would avoid discharges to receiving watercourses apart from those discharges permitted by Environmental Protection Licence for the facility during wet weather conditions.**

The EA is further noted to state that "the preferred option will be developed with input from relevant stakeholders (including the NSW Environmental Protection Authority)". Council has Officers with technical expertise in regard to its core responsibilities of relevance to this matter. **The DP&E is consequently requested to require that Sydney Water consult with Council specifically during the development of the preferred option.**

If you would like to discuss comments provided in this correspondence, please contact Council's Environmental Assessment Planner, David Henry, on (02) 4677 8287 or via e-mail david.henry@wollondilly.nsw.gov.au.

Yours faithfully



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ENVIRONMENTAL SERVICES