



Your ref: SSD-9774
File no: MC-19-00002

11 May 2021

NSW Department of Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2001

Recipient Delivery Katelyn.Symington@planning.nsw.gov.au

Attention: Katelyn Symington

Dear Madam

**SSD 9774 - Notification of exhibition of a State Significant Development
Application for construction and operation of a resource recovery facility
located at Honeycomb Drive, Eastern Creek**

Thank you for your correspondence dated 24 March 2021 requesting our comment on a Development Application for construction and operation of a resource recovery facility at Honeycomb Drive, Eastern Creek, which is a State Significant Development proposal under section 4.36 of the *Environmental Planning and Assessment Act 1979*.

The proposal has been reviewed by our officers and we object to the proposal until all our issues listed in the attachment to this letter are addressed.

We request that these matters are comprehensively addressed and returned back to Council for further comment and consideration.

If you would like to discuss this matter further, please contact Judith Portelli, our Manager Development Assessment, on 9839 6228.

Yours faithfully

Glennys James PSM
Director Planning and Development

Connect - Create - Celebrate

Council Chambers - 62 Flushcombe Road - Blacktown NSW 2148

Telephone: (02) 9839 6000 - DX 8117 Blacktown

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All correspondence to: The Chief Executive Officer - PO Box 63 - Blacktown NSW 2148

Blacktown Council's submission to SSD-9774

1. Planning issues

- a. The proposed signage includes 3 separate signs as illustrated on the proposed recycled shed wall that appear to far exceed 10% of the wall area. No dimensions have been provided for these signs to prove otherwise. More information is required to clarify this.
- b. Information signage is also proposed to be located on the fence-line around the boundary of the site. It is unclear if this signage is proposed as permanent or would only be in place temporarily during construction of the facility. More information is required to clarify this.
- c. The proposed above ground stormwater storage tanks will be setback 7.3 m from the front boundary and are therefore within the 7.5 m front setback, which is not compliant with the Eastern Creek Precinct Plan (Stage 3) Development Control Plan front setback controls. Perforated screens and significant additional screen planting around the tanks will be necessary along the street facing boundary of the site to offset the non-compliance if this is to be considered further.
- d. The proposed operating hours, being 24 hours a day, 7 days a week, is considered excessive and has not been adequately justified. More information is required to support this request.
- e. A draft Plan of Management has not been provided as to the emergency actions that will be taken in the event that contaminated materials are brought to the facility for processing.
- f. Photomontages of the proposal have not been provided as previously requested at SEARs stage.

2. Engineering issues

- a. The applicant is to submit a proper Engineering Plan Submission to ensure that infrastructure associated with any development is in accordance with Council's Engineering Guide for Development 2005. This is to ensure that the works constructed will be safe, serviceable, economical to maintain and meet Council's requirements.
- b. The original subdivision of the site was approved and provided with a water quality/OSD basin on site. This proposal does not propose access to the basin at all times for maintenance purposes, but this is necessary as part of this development. This access must be shown on the plans.

3. Traffic issues

- a. Concern is raised about the current level of operation of the traffic signals at the Wonderland Dr and Wallgrove Rd intersection. Council has been informed by other

businesses in the area that there are already extensive delays at this intersection. Any additional traffic movements arising from this proposal will exacerbate the existing traffic delays at this intersection. It is to be noted that these traffic signals are managed and operated by TfNSW, and so TfNSW must be consulted to provide comments on the applicant's traffic report to determine if the traffic signals are operating at a satisfactory level of service and if any measures need to be implemented by this proposal to improve their functioning.

4. Environmental Health issues

- a. The Air Quality and Greenhouse Gas Assessment states that *"even with a rigorous Dust Management Plan in place, it is not possible to guarantee that the dust mitigation measures will be effective all the time. There is the risk that receptors in the immediate vicinity of the construction zone might experience some occasional dust soiling impacts"*. It should be noted that this may contravene the POEO Act. More information is required as to how the applicant is going to control any dust on-site throughout construction and operational phases to ensure no impact on adjoining uses or result in complaints that Council will have to deal with later.

5. Flooding issues

- a. The Flood Risk Assessment by Martens reports that there is no flooding noted on this site. The report fails to recognise that the development is at the end of a cul-de-sac and there is a trapped low point in this location. Further, the main site building is located adjacent to this low point and is likely impacted by the upstream stormwater catchment that flows down the road to this site as overland flows. An overland flow study is required to demonstrate that the proposed development is adequately protected and can cater for this upstream overland flow path through the site, assuming the existing 1350 mm estate pipe is 25% blocked.

6. Drainage issues

- a. The concept plans by Martens are too general and do not contain a sufficient level of detail to make a proper assessment. Blacktown Council does not accept basic concept plans. More detailed engineering hydrological plans appropriate for this standard of development are required.
- b. The engineering model for this drainage is to assume that all the equipment storage area is to be paved.
- c. This is a large site and the number of pits supplied to collect these flows is insufficient. The number of inlet pits needs to be increased by a factor of 10 at least.
- d. All the trench grates and all other pits need to be shown on the plans as being piped to the GPT.
- e. A combination of trench grates and kerb entry pits are required for the ramp down from the end of the cul-de-sac. These are to be shown on the plans.

- f. The overflow from the rainwater tanks is not to discharge to the 1350 mm estate pipe. It is to discharge to a stormwater tank if provided, or otherwise direct to the wetland. This is to be included in revised calculations and modelling and resubmitted to Council.
- g. Detail in the engineering plans as to how the 1% AEP flows from lots 3, 4 and 5 discharge to the wetland / OSD system and do not bypass to the large swale along the southern and part eastern boundaries of the site.
- h. Number all pits on the engineering plans.
- i. Show all pit sizes and levels on the engineering plans.
- j. Show the drainage plans to a suitable scale that is legible at A3 printing on the plans.
- k. Provide drawing scale and drawing scale bar on the engineering plans.
- l. Provide suitable Relative Levels across the site surfaces and floor areas on the plans for Council's assessment.

7. Water quality and water conservation issues

- a. A GPT is required to be shown on the plans for on lot to treat the 4EY flow. This includes the overflow from the rainwater tanks which currently bypass this GPT. The proposed Vortechs device is not considered suitable. Appropriate devices include Vortsenty HS, CDS, OceanSave, Vortceptor, HumeGard or Stormceptor. These devices do not need to be modelled in MUSIC, just correctly sized for the catchment.
- b. The site is to achieve a minimum 80% non-potable water reuse. The approach and methodology undertaken in the Water Cycle Management Report by Martens is insufficient and does not meet Council's requirements.
- c. MUSIC is required to demonstrate a minimum 80% non-potable water reuse including all the demands and sources of water. This model needs to be provided electronically to Council for review.
- d. The toilet flushing requirement in the model is to be met through rainwater and not mains water. Waterless urinals should also be used where the target cannot be achieved.
- e. The non-potable reuse strategy involves the harvesting of stormwater from the wetland, however it is unclear whether the proposed reuse allocation of water from the wetland is to be split between the various lots within the estate. The current proposal would likely see all the potential reuse allocated to a single lot. Provide detail to Council of what legal arrangements are in place to enable this resource to be utilised in this way.
- f. For the proposed water conservation strategy of reuse water from the wetland, a drawdown of 100 mm is proposed, however no details are provided to verify environmentally that this water can be sourced from the wetland while still ensuring the wetland remains viable and healthy for pollutant removal. A review from an

experienced wetland ecologist is required to assess the quality of the existing wetland plants and their ability to handle the stress of continually draining the water and any recommendations.

- g. A review of aerial photos over time suggests that there are areas within the wetland that appear dry for long periods. This suggests that substantial sedimentation may have occurred within the wetland/OSD basin since establishment, which may impact its viability for a water source. A detailed survey is required of the overflow pipe invert levels to establish the permanent water levels and the levels within the marsh zones to confirm planting depths and areas of deeper water. Similarly, the total area of the wetland available for storage is required to establish source volumes.
- h. Assuming the wetland is viable as a water source, provide a location plan (likely the deep-water zone) and an offtake pit detail for the pump pit showing a controlled weir inflow.
- i. Provide detail to Council of the proposed pump rate from the wetland, duration of pumping and whether this is to go to a holding tank.
- j. The applicant is required to consider the provision of stormwater tanks (SWTs) within Lot 5 to collect surface flows prior to discharge to the wetland to supplement wetland source water. Stormwater could be pre-treated by the GPT prior to discharge to the SWT. Similarly, any overflow from the rainwater tank could go direct to the stormwater tanks.
- k. As a further strategy consideration should be given to wastewater recycling.
- l. For water sourced from the wetland or separate stormwater tank, provide details to Council of what levels of treatment and types are required to ensure water is fit for purpose.
- m. The water strategy, is to demonstrate how the various non-potable water sources (stormwater, rainwater, wetland and recycled wastewater [if used]) will be used for what end uses and integrate together to protect the wetland.
- n. An amended MUSIC model is required to address the reuse on site:
 - o The Stormwater tank and rainwater tank are to be noted on the drainage plan as 10% smaller than the volume on the plan.
 - o Include the reuse systems with stirrers if relevant.
 - o Need to clearly set out what uses are being supplied from what tanks.
 - o Show the RWT overflowing to the stormwater tank.
 - o Assess for the Stormwater tank whether all the surface flow or preferably only the treated GPT flow discharges to this tank.
 - o Amend the wetland node based on the detailed survey information.
 - o Detail the proposed pump rate from the wetland, duration of pumping and whether this is to go to a holding tank.
 - o Provide a secondary link from the wetland to the stormwater tank in lot 1 noted as "reuse".
 - o The model should be run through a series of models with varying Stormwater and rainwater tank sizes to determine the optimum sizing. Provide a graph with tank size on the X axis and % reuse on the Y axis.

- Once the tank size has been optimised, check the optimum wetland reuse rate from the wetland. Provide a graph with wetland reuse on the X axis and % reuse on the Y axis.
- Submit an amended MUSIC model digitally.