Blacktown City Council

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

17 January 2022

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

Recipient Delivery Christopher.Fraser@planning.nsw.gov.au

Attention: Christopher Fraser

Dear Sir/Madam

SSD 9774 - Notification of the applicant's response to submissions received for 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 20 December 2021 requesting our comments in respect of the applicant's response to our initial submission of 11 May 202. The matter relates to 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 applicant's response to submissions has been reviewed by Council officers. In doing so Council officers have noted that a number of issues - as listed in the attachment to this letter, still need to be addressed.

Council therefore requests that these matters be 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

Peter Conroy
Director City Planning and Development

Blacktown City Council's response to submissions to SSD-9774

1. Traffic issues

a. The following response is noted as part of the Response to Submissions Report by Ethos Urban dated 2 December 2021

> "*Transport for NSW has been consulted on several occasions throughout the assessment of the proposal. Transport for NSW has not raised any concerns in their submission regarding traffic delays at the Wonderland Drive and Wallgrove Road intersection or traffic. It is considered that no further action is required in this regard"*.

No evidence has been submitted to verify the above claims by the applicant, therefore we do not accept that the above response satisfactorily addresses Council's concerns.

2. Flooding issues

a. Section 5.3 of the Water Cycle Management Plan dated August 2021 prepared by Martens details the flooding flows at the trapped low point at the end of cul-de-sac. Martens identify a 1% Annual Exceedance Probability overland flow of 2.667 m3/s entering the property and note a trapezoidal channel 10 m wide and 0.8 m deep is required to convey this flow.

However, there are no details of how this 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. The flow width at the boundary is likely to be much larger than the 10 m wide channel. When reviewing the contours in the cul-de-sac around the trapped low point these contours appear to suggest that the overtopping flows are initially directed to 22 Hanson Place (Lot 62), however google street view and Council's Geographic Information Service contours suggest that this survey information is outdated and will not give a true indication of how excess flows are directed. Additional survey is required 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.

3. Drainage issues

a. The concept plans by Martens are general and do not contain a sufficient level of detail to make a proper assessment. Amended drainage details are required to address the following.

- All the drainage calculations are to be redone based on the entire area being fully paved, other than the upstream flow swale at the south of the lot.

- On drawing E100(C) and E101(A) notate levels on the contours and bold say the 5 m contour depending on the contour interval.
- On drawing E100(C) provide a minimum 25 kL rainwater tank in lot 3 collecting all the roofwater off the Sales Office and Production Office. The rainwater tank water is to be used for flushing the toilets of all these offices and the weighbridge toilet (if provided). Lot 3 is currently an independent lot and the height difference between the current rainwater tanks in lot 5 and toilets in Lot 3 is significant and this leads to a better outcome.
- In Council's review of the main separation building in Lot 5, it appears that there are no toilets in this facility. Please confirm.
- Provide a strategy for the use of water for dust suppression in the Water Cycle Management Plan prepared by Martens by detailing how rainwater will be used first, followed by stormwater and only then use mains water as a last resort.
- On drawing E100(C) the use of a swale to collect 1% Annual Exceedance Probability surface flows along the southern boundary of lot 3 appears flawed where these two areas (Lots 3 and 4) may be integrated from a work perspective. i.e. several access points for vehicle movements across the swale may be required. If not ignore. Contours are not clear as to relative levels.
- On drawing E100(C) for lot 3 provide either a raised planter bed or more clearly define the swale (with sizes) along the full length of the Hanson Place road boundary to direct surface flows to the gross pollutant trap.
- On drawing E100(C) the swale to collect 1% Annual Exceedance Probability surface flows along the southern boundary of lot 3 is substantially undersized to convey the 1% Annual Exceedance Probability flows with the site 100 % impervious. Amend details on drawing E200 (B). Also, the western end of the swale flows is to be directed to a pit and piped to an inlet pit upstream of the gross pollutant trap as swale currently travels uphill.
- On drawing E100(C) for lot 3 the configuration of the gross pollutant trap and the pipe and swale flows is incorrect. Provide a new inlet pit and position the gross pollutant trap downstream of the new pit, pipe and swale configuration to ensure these flows can be treated.
- On drawing E100(C) for lot 3 the gross pollutant trap nominated is too small. Provide either an Ocean Protect Vortsentry HS 21, Ocean Protect OceanSave OS-1112, SPEL Vortceptor SVO.140 or Rocla CDS 1012.
- On drawing E100(C) for lot 5 based on Section 5.3 of the Water Cycle Management Plan dated August 2021 prepared by Martens detail the widening of the swale to convey the widened flow width at the trapped low point at the end of cul-de-sac into the main swale. Provide a section through the trapezoidal channel 10 m wide and 0.8 m deep and show the relative floor level of the main building particularly at the critical eastern end.
- This is a large site and the number of pits supplied to collect these 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

- On drawing E100(C) and drawing E101(A) detail how an eductor truck and other maintenance vehicles can reach the large estate gross pollutant trap and the estate bioretention basin clear of the main building and allowing entry and egress from this area in a forward direction.
- Ensure any changes to drawing E100(C) detailed above are repeated on drawing E101(A) where they overlap.
- Detail how the 1% Annual Exceedance Probability flows in excess of the pipe capacity are directed to the detention basin.
- On drawing E101(A) for lot 5 the gross pollutant trap nominated single HS24 is too small. Provide either twin Ocean Protect Vortsentrys HS 24, Ocean Protect OceanSave OS-1618, SPEL Vortceptor SVO.360 or Rocla CDS 1518.
- A combination of trench grates and kerb entry pits are required for the ramp down from the end of the cul-de-sac.
- Amend drawing E200 (B) to address the following:
    - At the schematic of the above ground rainwater tanks show some type of pre-treatment before discharging to the tanks.
    - The schematic of the above ground rainwater tanks air space of 200 mm does not match the 375 mm overflow pipe size. Review tank size to achieve the minimum volume.
    - The schematic of the above ground rainwater tanks shows 300 mm pipes. Nominate polyvinyl chloride (including overflow) otherwise up pipe sizes if using concrete.
    - For the swales provide catchment calculations based on 100% impervious catchment.
    - For the swales review the dimensions and allow for 100 mm freeboard.
    - The splitter pit details are incorrect. The diversion weir cannot be lower than the storage level in the stormwater tank. Alternatively lower the storage level in the stormwater tank.
    - The configuration of the Splitter Pit details and the Underground Stormwater tank Layout is incorrect. Direct the 675 mm outlet pipe straight to the existing discharge pipe to the estate basin and NOT to the stormwater tank. Likely reposition the gross pollutant trap to the south and the 675 mm pipe to the north.
    - Review the sizing of the 675 mm inflow pipe based on the 100 % impervious upstream catchment and increase as required.
    - Amend the Underground Stormwater tank Layout to provide 1200 x 1200 access to the main tank and ensure both access points are sealed. Suggest for work health safety use twin 1220 x 600 lids. Relocate the access point to the main tank to be above the pump.
    - Amend the Underground Stormwater Tank Layout to show a minimum storage of 30 kL below overflow level.
    - Note the changes to the gross pollutant trap device detailed above.

- Review the size of the 600 mm pipe to the estate basin. Currently have twin 375 mm pipes and a 675 mm pipe discharging to a 600 mm pipe. Provide a supplementary parallel pipe from the 675 mm connection pipe upstream of the gross pollutant trap to convey the 5% Annual Exceedance Probability flows to the estate basin based on 100% impervious. Nominate the invert level on the 600 mm pipe.

- On drawings E300(B), E301(B) and E302(A) nominate the design for the 5% Annual Exceedance Probability, show the flows and the hydraulic grade line.

4. Biodiversity

a. The Biodiversity Development Assessment Report document put forward for the development does not assess the indirect or direct impacts of the development on adjacent vegetation to the south west of the site.

An assessment of the impacts of stormwater on the adjacent vegetation is required.