

Deana Burn

From: Andre Vernez <Andre.Vernez@shoalhaven.nsw.gov.au>
Sent: Monday, 12 December 2016 9:46 AM
To: Deana Burn
Subject: Shoalhaven Starches Modifications 10 & 11 - Flour Mill 'B' & Dryers, Cooling Towers, Maintenance Building & Biofilters - COMMENTS FROM SHOALHAVEN CITY COUNCIL
Attachments: SW DA Notice - 3A07-1008 - N4 (MOD 10 & 11).pdf
Follow Up Flag: Flag for follow up
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Dear Deana,

Please find below comments from Shoalhaven City Council in relation to Shoalhaven Starches Modification No. 10 (Flour Mill 'B') and 11 (Dryers, Cooling Towers, Maintenance Building & Biofilters). In summary, Council has no objection in principle subject to the following advice being considered. Comments have been segregated relating to the relevant sections of Council.

MODIFICATION NO. 10

Flooding Comments/Requirements:

Council's Natural Resources & Floodplain Unit request the following be provided:

1. An updated flood emergency plan.
2. A report which demonstrates that the proposed modifications can withstand the forces of flood waters, debris and buoyancy forces up to the 0.2% AEP flood event (as previously requested).
3. The floor level for the Flour Mill 'B' needs to be raised at or above the FPL (6.1m AHD), unless the structure is sealed up to the FPL.

Traffic & Transport Comments/Requirements:

Council's Traffic Unit generally accept the ARC report (dated October 2016). There are only a few statements not agreed with in that report including:

1. Page 4, paragraph 1; ARC states that traffic volumes will reduce on Bolong Road following the upgrade of the Highway between Gerringong and Bomaderry. This is strongly disagreed. The suggestion from RMS that 50% of through traffic will divert following the upgrade is based on improved travel times in the 100kph environment generally along the route. However, traffic modelling indicates that unless 6 lanes and traffic signals are provided through the Bomaderry area, very long queues are likely to form through Bomaderry and motorists will still have the option of using the 'sand track' to achieve travel time savings. Accordingly, Council considers that there may be some short term diversions but expect that traffic return to the 'sand track' to avoid the queuing through Bomaderry. Notwithstanding, ARC have undertaken the assessment based on continued use of the 'sand track' by through traffic, which is appropriate in Traffic Unit's view.
2. Page 8, first dot point; ARC states construction parking can occur on the northern side of Bolong Road, although Traffic Unit's observation is that the car park is already full. In this regard, it is suggested that the situation be re-examined required to ensure that any short term construction parking will be practical, and will be sufficient to address the likely demand.

3. The Traffic Unit accepts that “post construction” the operation of the Proposed Flour Mill ‘B’ Modification will have negligible impact on traffic flows and will not impact the other access points that remain of greater concern to Traffic Unit.
4. A suitable traffic management plan needs to be submitted to manage the construction traffic and parking issues.
5. The parking plan needs to work and have sufficient parking to cater for the temporary construction parking demand.
6. It is accepted that outstanding traffic and road issues relating to earlier consents can be addressed as a separate matter, however, the Traffic Unit would be pleased to see these outstanding issues addressed expediently in the interests of road safety. The Traffic Unit would be happy to meet with the applicant and/or applicant’s consultants to discuss all of the remaining outstanding issues to be addressed.

Building Comments/Requirements:

1. The application should be referred to NSW Fire & Rescue for comment given the hazardous nature of the site.

Environmental Health Comments/Requirements:

Environmental Services concurs with the methodology, findings and recommendations of the:

1. Geotechnical and Preliminary Environmental Assessment, encompassing the Phase 1 potentially contaminated land assessment and acid sulfate soils assessment prepared by Coffey Geotechnics Pty Ltd (dated 10 October 2016), subject to the concurrence of the NSW Environment Protection Authority (EPA) as the premises are licenced with them, and
2. Environmental Noise Impact Assessment prepared by Harwood Acoustics (dated 11 October 2016), subject to the concurrence of the NSW Environment Protection Authority (EPA) that the premises meet the EPA’s noise design goals (Licence #883).

Development Engineering Comments/Requirements:

1. Construction Vehicle Parking has been the biggest issue for Manildra and needs to be addressed and dealt with properly as part of these applications.
2. The outstanding works required to be completed by Manildra in particular across the frontage of the Old Dairy Farmers site should be done and completed before any other approvals.

Shoalhaven Water Comments/Requirements:

1. Council’s Shoalhaven Water provides the attached Notice.

MODIFICATION NO. 11

Flooding Comments/Requirements:

1. Further investigation into Scenario C in the Flood Impact Assessment Report to suggest an alternative way to minimise the hydraulic impacts. The Flood Impact Assessment Report shows that Scenario C for the Coal and Woodchip storage area at Hanigans Lane may produce over a 0.1m increase in the flood level on the south side of the proposed development and may increase the velocity significantly at Bolong Road, which in turn may affect private properties.
2. Written clarification as to how the emergency coal and woodchip storage area will be utilised if the road is inundated, given Bolong Road being inundated during frequent flood events.

3. Written clarification as to how the coal and woodchips at the storage area at Hanigans Lane will not become debris during a flood event.
4. The floor levels for the MCC room, Forklift maintenance building and DDG Dryers need to be raised to at or above the FPL (6.3m AHD), unless the structures are sealed up to the FPL.
5. An appropriate consulting Engineers report to demonstrate that the buildings including the silos will not become floating debris during a 0.2% AEP flooding scenario. This report can be provided prior to construction.

Traffic & Transport Comments/Requirements:

Council's Traffic Unit comments on the ARC report (dated April 2016) :

Extract from the ARC report: Stated at 1.2.2

As stated above, the infrastructure works recommended in the Access Review and the DF Meat TIA – and moreover conditioned upgrades required under the earlier DF Site approvals - have either been completed, or have been approved by Council [based on final engineering/design plans] to construction.

ARC notes that the Meat Plant has been approved, and is currently operational.

Original works required under the 3A approval were undertaken at the Dairy Farmers access and there are still outstanding issues associated with that work that needs to be addressed (work not completed in accordance with approved plans). It was agreed those issues could be addressed by Shoalhaven Starches when further upgrade works were proposed as required under the Meatworks DA. That later work has never been undertaken. Accordingly, the safety issues associated with failure to complete the original works in accordance with approved plans is still outstanding.

Extract from the ARC report: Stated at 1.3.3

1.3.3 Bolong Road & Hannigans Lane, Hannigans Lane & Farm Site

These intersections would be used by all vehicles associated with the expanded operation of the Farm Site storage area proposed under the Modification. However – and with reference to Section 2 below – the Modification is expected to generate no vehicle trips to these intersections during weekday peak periods, but rather (only very minor flows) to nonpeak periods only. Given the low turning movements at these intersections and increasingly reduced through flows in Bolong Road even during peak periods, there is no information to suggest that the Modification would impact the performance of these intersections.

This section of the report regarding Hanigans Lane does not mention that the existing automatic gates installed years ago by Shoalhaven Starches (SS) without approval do not comply with AUSTRROADS or Australian Standard requirements, due to inadequate setback. In a meeting with Brian Hanley (SS) on 8 November 2016, it was stated that SS have since relocated the gates to more than the required minimum setback. However, this is yet to be confirmed.

Extract from the ARC report: Stated at 1.4

In recent assessments consideration has also been given the redistribution of trips from Bolong Road (the 'Sandtrack') to the upgraded Princes Highway, a redistribution that is currently well advanced further to the opening of the Gerringong Bypass section of the Princes Highway.

This is strongly disagreed. The suggestion from RMS that 50% of through traffic will divert following the upgrade is based on improved travel times in the 100kph environment generally along the route. However, traffic modelling indicates that unless 6 lanes and traffic signals are provided through the Bomaderry area, very long queues are likely to form through Bomaderry and motorists will still have the option of using the sand track to achieve travel time savings. Accordingly, Council considers that there may be some short term diversions but expect that traffic return to the sand track to avoid the queuing through Bomaderry.

It is also not true to suggest that diversions are advanced due to completion of Stage 1 of the Highway upgrade works. The fact is that Bolong Road and the sand track are experiencing extraordinarily high traffic loads from traffic avoiding the Highway during the upgrade works.

ARC are to ensure their assessments are based on continued use of the sand track by through traffic.

Extract from the ARC report: Stated at 2.3.3

and where the key Bolong Road traffic flow is steadily being reduced further to the upgrade of the Princes Highway.

See comments above, this is strongly disagreed.

Extract from the ARC report: Stated at 2.3

The only component of the Modification which would generate additional operational traffic would be the expanded use of the coal and woodchip storage area at the Farm Site. It is noted that while the Modification provides for this expanded use, it is forecast that additional trip generation (associated within this expanded use) would be unlikely for some years.

See comments above, the access point on Hanigans Lane needs to comply with minimum Australian Standards/AUSTROADS requirements to ensure heavy vehicles can access the farm site without delays or adverse safety impacts to other traffic on Hanigans Lane. As noted above, in a meeting with Brian Hanley (SS) on 8 November 2016 it was stated that SS have since relocated the gates to more than the required minimum setback. However, this is yet to be confirmed.

Extract from the ARC report: Stated at 2.5

- *All parking for construction staff and construction heavy vehicles must be contained within an appropriately secure on-site environment so as not to impact or be impacted by existing SS Site operations; or on the off-site traffic environment.*

Not just parking for new construction staff. Adjacent to the Moorehouse is one of the most significant staff car parks on the SS site and that will be impacted by the demolition and starch dryer construction works on the Moorehouse site. Accordingly, it needs to be demonstrated that temporary car parking during construction will not just satisfy new construction staff and associated heavy vehicles but also needs to be sufficient to accommodate displaced staff car parking caused by the demolition and construction works.

Extract from the ARC report: Stated at 3

- *An appropriate set of construction traffic management strategies will be put in place through the construction period.*

This is agreed, and needs to be confirmed prior to any commencement.

Other comments:

1. A suitable traffic management plan needs to be submitted to manage the construction traffic and parking issues. The parking plan needs to work and have sufficient parking to cater for the temporary construction parking demand, including not just new construction staff vehicle demand but also displaced car parking.
2. It is accepted that outstanding traffic and road issues relating to earlier consents can be addressed as a separate matter, however, Traffic Unit would be pleased to see these outstanding issues addressed expediently in the interests of road safety. Traffic Unit would be happy to meet with the applicant and/or applicant's consultants to discuss all of the remaining outstanding issues to be addressed.
3. It is again noted that in a meeting with Brian Hanley (SS) on 8 November 2016 it was stated that SS will be addressing all outstanding issues in the next modification. That is yet to be confirmed.

Building Comments/Requirements:

1. The application should be referred to NSW Fire & Rescue for comment given the hazardous nature of the site.

Environmental Health Comments/Requirements:

Environmental Services concurs with the methodology, findings and recommendations of the:

1. Environmental Noise Impact Assessment prepared by Harwood Acoustics (dated 27 October 2016), subject to the concurrence of the NSW Environment Protection Authority (EPA) that the premises meet the EPA's noise design goals (Licence #883).
2. Air Quality and Odour Impact Assessment prepared by GHD (dated May 2016), subject to the concurrence of the NSW Environment Protection Authority (EPA).

Also:

3. Air handling systems and cooling towers must be designed, installed and maintained in accordance with the requirement of the Public Health Act 1991 (Part 4 Microbial Control) and Regulations. Further, the air handling system cooling tower must be designed and installed in accordance with Australian Standard AS3666.1:1995 'Air handling and water systems in building - microbial control' and shall be maintained in accordance with Australian Standard AS3666.2:1995 'Air handling and water systems in building - microbial control - operation and maintenance'.
4. It is legally incumbent on the occupier of the premises to notify the Local Authority (Council) of any changes necessary to update the Register of Premises with Regulated Air Handling Systems installed on them.

Development Engineering Comments/Requirements:

1. Construction Vehicle Parking has been the biggest issue for Manildra and needs to be addressed and dealt with properly as part of these applications.
2. The outstanding works required to be completed by Manildra in particular across the frontage of the Old Dairy Farmers site should be done and completed before any other approvals.

Shoalhaven Water Comments/Requirements:

1. Council's Shoalhaven Water provides the attached Notice.

Should you have any questions in relation to the above please give me a call.

Regards,

Andre Vernez
Senior Development Planner
Shoalhaven City Council

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