#### **Andre Vernez**

**From:** Andre Vernez

**Sent:** Tuesday, 9 November 2021 8:47 AM

**To:** Deana Burn

**Subject:** Shoalhaven Starches Modification 23 - Modifications to Gas Fired Co-Generation Plant -

COMMENTS FROM SHOALHAVEN CITY COUNCIL ON REQUEST FOR ADVICE

**Importance:** High

Dear Deana,

Please find below comments from Shoalhaven City Council on the Request for Advice in relation to Shoalhaven Starches Modification No. 23 (Modifications to Gas Fired Co-Generation Plant).

#### **MODIFICATION NO. 23**

## **Development Engineering Comments/Requirements:**

- 1. No impact to Council assets has been identified.
- 2. Section 138 approval will be required for works in the road reserve for the gas pipeline crossing.

## **Environmental Health Comments/Requirements:**

3. It is noted that the NSW Environment Protection Authority (EPA) is the appropriate regulatory authority for the proposed modifications.

No updated conditions are required by Council in this regard.

Odour dispersion modelling undertaken by GHD in the air quality impact assessment for the quarter with maximum odour emissions (in accordance with the methodology adopted for past modification air quality assessments) identified marginal increase in odour predictions predicted at two (2) receptors and a marginal decrease predicted at three (3) receptors. According to GHD the fluctuation in odour predictions for this modification when compared with the previous modification (Mod 19) was attributed to variability in odour sampling. According to GHD odour dispersion modelling predicted compliance of the odour criteria at all residential receptors. In addition, dispersion modelling of combustion products, particulates, PAH, VOCs and metals predicted compliance with the criteria at all residential sensitive receptors. Overall, according to GHD, the proposal should be acceptable from an air quality perspective.

The noise assessment by Harwood Acoustics provides noise control recommendations to reduce the level of noise from the modified project to within site specific noise design goals at all receptor locations. The noise design goals have been established to ensure that the noise limits prescribed in the Environment Protection Licence for the site (EPL 883) continue to be met at all receptors.

#### Natural Resources & Floodplain Comments/Requirements:

4. The subject site is within the high hazard floodway / flood storage zone with a 2050 scenario Flood Planning Level of 6.2m AHD.

The proposed development has been assessed as Type C "Commercial / Industrial / Agricultural Buildings / Retail" land use type in accordance with Schedule 1 of Chapter G9 of SDCP 2014. The proposed development complies with the requirements of this chapter.

The consultant assessed the proposed development in accordance with the performance criteria and acceptable solutions of Chapter G9. The proposed works do not involve the placement of fill or excavation.

The hydraulic impact of the proposed development has been assessed. The proposed works were included in a TUFLOW hydraulic model. The hydraulic model results indicated that there is no change in the 1% AEP flood level outside the Shoalhaven Starches Plant.

5. The following conditions of consent are recommended.

### Flooding - Construction Certificate Requirements within Flood Prone Land

Prior to the issue of a Construction Certificate, a professional engineer, (as defined in the National Construction Code) must submit to the satisfaction of the Certifier, certification that the following items have been detailed on the construction drawings:

- a) Any proportion of the structure below the Flood Planning Level (FPL) must be built from flood compatible materials.
- b) All electrical installations must be constructed above the FPL or be able to be isolated prior to a flood event
- c) The location of all hazardous substances are located at or above the 1% Annual Exceedance Probability (AEP) Flood Level.
- d) A flood evacuation plan must be prepared to ensure permanent, fail-safe, maintenance-free measures are incorporated in the development to ensure that the timely, orderly and safe evacuation of people is possible from the area and that it will not add significant cost and disruption to the community or the SES. This plan is to consider for pre-flood event planning the use of Flood Warning Products available from the Bureau of Meteorology.

# Flooding – Construction Certificate Structural Soundness Requirements within Flood Prone Land

Prior to the issue of a Construction Certificate, a professional engineer, (as defined in the National Construction Code) must submit to the satisfaction of the Certifier, certification that the building and associated structure(s):

- a) Can withstand forces of floodwaters including debris and buoyancy forces up to a 1% Annual Exceedance Probability (AEP) flood event.
- b) Will not become floating debris during a 1% AEP flood event.

# **Shoalhaven Water Comments/Requirements:**

6. Shoalwater infrastructure is within the vicinity of the proposed gas main. Depths and alignments of sewer and water will need to be confirmed prior to commencement of works, particularly the trenching and underbore works.

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

Regards,

#### **Andre Vernez**

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