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NSW Planning & Environment
Att. rebecka.groth@dpie.nsw.gov.au.

APPLICATION	DE-2018/65
Date	2 February 2022

Dear Sir/Madam

Development	Proposed Liquid Waste Treatment Plant - 2018 Advice on EIS - Liquid Treatment Plant - 2021 Advice on RTS - Liquid Treatment Plant – 2022
Location	201 Five Islands Road, UNANDERRA NSW 2526

STATE SIGNIFICANT DEVELOPMENT SSD 8304 – PROPOSED LIQUID WASTE TREATMENT– REQUEST FOR ADVICE

Thank you for providing Council with the further opportunity to comment on this State Significant Development proposal.

The submitted documentation relating to the proponent's Response to Submissions has been reviewed and updated comments are provided overleaf.

If you have any enquiries or wish to discuss these matters further, please contact me on (02) 4227 7111.

This letter is authorised by

John Wood
City Wide Development Manager
Wollongong City Council
Telephone (02) 4227 7111

Council comments for the proposed Liquid Waste Treatment Plant

The following matters are identified for consideration by the Department:

1. Planning

   · The site is zoned IN3 – Heavy Industrial pursuant to Wollongong Local Environmental Plan (WLEP) 2009. The proposed liquid waste treatment plant is considered permissible in the zone.

   · There is no maximum building height or floor space ratio for the subject allotment pursuant to WLEP 2009. It is noted that the proposal comprises of the installation of equipment and an internal fit out for the purposes of liquid waste treatment within the existing Building E. Whilst it is appears that no external or structural works are proposed to the existing building, any building works if proposed are to comply with the Building Code of Australia/NCC.

2. Development Engineering

   This application has been assessed with consideration to Chapters E13 (Floodplain Management) and E14 (Stormwater Management) of the Wollongong DCP2009. Should the consent authority choose to grant approval to the proposal, the following requirements should be applied:

   Flood Level Requirements

   The following requirements should be incorporated into the design and construction of the development:

   a Industrial floor levels should be constructed at a minimum of RL 9.84 metres AHD.

   b Habitable floor levels should be constructed at a minimum of RL 10.34 metres AHD. For the purpose of applying this requirement, a habitable floor means a floor area used for offices or to store valuable possessions susceptible to flood damage in the event of a flood.

   c Any portion of the building or structure below RL 10.34 metres AHD should be built from flood compatible materials. Where materials are proposed and not listed in Appendix B of Chapter E13 of the Wollongong DCP2009, relevant documentation from the manufacturer should be provided demonstrating that the materials satisfy the definition of 'flood compatible materials' as stated in Chapter E13 of the Wollongong DCP2009.

   d The building within which the development is proposed needs to be capable of withstanding the forces of floodwater, debris and buoyancy up to and including RL 10.43 metres AHD. Where works are required to achieve this, those works should be detailed on the construction plans.

   e A bund wall should be provided around the perimeter of the building housing the liquid waste treatment plant, designed to ensure floodwater will not physically enter the building during a flood. The bund wall must satisfy the following criteria:
      - must be continuous around the permitter of the building;
      - must be impermeable;
      - must have a minimum top of wall level of RL 10.43 metres AHD; and
      - must be capable of withstanding the forces of floodwater, debris and buoyancy up to and including RL 10.43 metres AHD.

   f The existing reinforced concrete wall around the perimeter of the building may be utilised in forming the bund wall where it can fulfil the above criteria or be modified to fulfil the above criteria. Any modification works required should be detailed on the construction plans.

   Site Filling

   Filling on the site within the floodplain should not be permitted.

   Survey Report for Floor and Bund Wall Levels

   A Survey Report should be obtained from a registered surveyor, verifying that each floor and top of bund wall level accords with the levels required by this approval. The survey should be undertaken after the formwork has been completed and prior to the pouring of concrete for each respective level. All levels should relate to Australian Height Datum.

Supervision of Engineering Works
All engineering works associated with the development should be carried out under the supervision of a practicing engineer.

No Adverse Run-off Impacts on Adjoining Properties
It should be ensured that the design and construction of the development will not cause any adverse effects to adjoining properties, as a result of flood or stormwater run-off. Attention should be paid to ensure adequate protection for buildings against the ingress of surface run-off. Allowance should be made for surface run-off from adjoining properties. It should be ensured that any redirection or treatment of that run-off will not adversely affect any other property.

Flood Compatible Materials – Electrical
All power service (metering) equipment, power outlets, switches etc. should be located above RL 10.34 metres AHD. All electrical wiring installed below this level should be suitable for continuous underwater immersion and should contain no fibrous components. Earth leakage circuit breakers shall also be installed. Any equipment installed below or partially below RL 10.34 metres AHD should be capable of disconnection by a single plug and socket assembly.

Structural Soundness Certification
A report from a suitably qualified and experienced structural engineer should be obtained, prior to the commencement of use of the development. This report should verify that the development (including the building and bund wall containing the liquid waste treatment plan) can withstand the forces of floodwater, debris and buoyancy up to and including RL 10.43 metres AHD.

Storage of Goods and Materials
An area should be provided within the building to store materials above the 1% AEP flood level plus 0.5m (freeboard), being above a level of RL 10.34 m AHD. During the operational phase of the development, all materials which may cause pollution or be potentially hazardous during a flood should be stored within the bunded building area. No part of the land outside the bunded building area should be used for purposes of storing materials which may cause pollution or be potentially hazardous during a flood.

Development in Accordance with Flood Risk Management Study
The proposed development (including construction and operation) should be undertaken generally in accordance with the report titled '*DGL Group Limited Proposed Liquid Waste Treatment Plant Flood Risk Management Study*' prepared by SitePlus (Reference 16151, Revision 3, dated August 2021).

Flood Emergency Response Plan
An effective Flood Emergency Response Plan (FERP) and procedure should be prepared by an appropriate consulting engineer. The report should incorporate an effective flood emergency response process and procedure for management of the site and evacuation during flood events.

3. Traffic

It is noted that the site is accessed via the State Road network which is under the jurisdiction of TfNSW. Comments would need to be sought from TfNSW regarding the network and intersection impacts.

From review of the proposal, it can be seen that background traffic growth has been established from previous traffic counts using pre-COVID data to estimate current and future (10 year) traffic growth assumptions. This method is accepted due to the current downturn in traffic from COVID restrictions/lockdowns etc.

The relevant intersections were assessed. The level of service at these intersections was found to exceed the operating capacity with background traffic alone.

However, the additional development traffic (5 additional heavy vehicles per day, and 6 additional peak hour staff movements) were shown to have a minimal effect on the future operation of these intersections.

Swept paths demonstrate that the design vehicle is able to enter and exit the site in a forward direction.

The proposed expansion of the internal car parking area appears to be generally acceptable. During construction the layout would need to comply with AS 2890.1.

- The parking dimensions, internal circulation, aisle widths, kerb splay corner clearance heights, ramp widths and grades of the car parking areas are to be in conformity with the current relevant Australian Standard AS 2890.1, except where amended by other conditions of this consent. Details of such compliance are to be reflected on the Construction Certificate plans.
- Each disabled person's parking space must comply with the current relevant Australian Standard AS 2890.6 – Off-street parking for people with disabilities. This requirement shall be reflected on the Construction Certificate plans.
- Any proposed structures adjacent to the driveway shall comply with the requirements of the current relevant Australian Standard AS 2890.1 to provide for adequate sight distance. This includes, but is not limited to, structures such as signs, letterboxes, retaining walls, dense planting etc. This requirement shall be reflected on the Construction Certificate plans.
- Approval, under Section 138 of the Roads Act must be obtained from Wollongong City Council's Development Engineering Team prior to any works commencing or any proposed interruption to pedestrian and/or vehicular traffic within the road reserve caused by the construction of this development.
- The application form for Works within the Road Reserve – Section 138 Roads Act can be found on Council's website. The form outlines the requirements to be submitted with the application, to give approval to commence works under the roads act. It is advised that all applications are submitted, and fees paid, five (5) days prior to the works within the road reserve are intended to commence. The Applicant is responsible for the restoration of all Council assets within the road reserve which are impacted by the works/occupation. Restoration must be in accordance with the following requirements:

  a All restorations are at the cost of the Applicant and must be undertaken in accordance with Council's standard document, "Specification for work within Council's Road reserve".
  b Any existing damage within the immediate work area or caused as a result of the work/occupation, must also be restored with the final works.

4. Environment

- Stage 1 and Stage 2 Site Investigation
  Stage 2 Detailed Site Investigation resulted from the Stage 1 Preliminary Site Investigation recommending a targeted soil and groundwater sampling program and Environmental Management Plan (EMP).

  Council agrees with Dr James Fox (Principal Geochemist) Land & Water Consulting review and assessment of the Stage 2 Detailed Site Investigation.

- BDAR Waiver
  There are no issues with the BDAR waiver as the site is entirely hardstand or existing buildings.

- Noise Impact Assessment

  The Noise Impact Assessment and Modelling assumed a potential worst-case scenario with predicted results being within applicable criteria. Council agrees that proposed project can operate within acceptable noise criteria at the designated sensitive receivers.

- Air Quality and Greenhouse Gas Assessment

  Air Quality

  CALPUFF predictive air dispersion modelling was used to assess the potential for off-site air pollutant impacts. The consultant has stated…

  "It is predicted that the Project would have a negligible incremental and cumulative impacts at the surrounding residential receptor locations and would comply with the relevant air quality criteria.

  Nevertheless, the site would apply appropriate air quality mitigation and management measures to ensure it minimizes the potential occurrence of excessive air emissions from the site."

  Greenhouse Gas Assessment

  The consultant predicts annual contribution annual greenhouse emissions to be 0.0007 percent of the estimated greenhouse gas emissions for Australia during 2016 which was 533.0Mt CO2-e (Department of the Environment and Energy, 2019). Council is of the opinion with continued vigilance and improvement that this contribution is negligible.

  Council agrees that proposed project can operate without causing significant air quality impact at residential receptors in the surrounding environment.

- Water and Land Pollution Incident - Flash Flooding

  It would be essential for the applicant to meet the responsibilities of the POEO ACT (as a minimum the definition of water pollution). It is noted that updated flooding and stormwater comments account for mitigation of flood impacts for the proposal.