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29 October 2012

Ms Belinda Scott  
Department of Planning & Infrastructure  
GPO Box 39  
Sydney NSW 2001

**Environmental Assessment for Water and wastewater servicing of the West Dapto urban release area and adjacent growth areas (09\_0189)**

Dear Belinda,

Thankyou for the opportunity to comment on the above mentioned Environmental Assessment (EA). It should be noted that the comments provided are the opinion of the council officers and have not been formally endorsed by Council.

I have reviewed the exhibited Environmental Assessment and would like to re-iterate a number of concerns that were raised in my previous correspondence dated 3 April 2012 that appear to have not been adequately addressed in the EA. In this regard I would like to offer the following comments:

- The EA appears to have been prepared for the purpose of concept approval only. There is limited reference to the project approval application. In this regard, insufficient detail and impact assessment has been provided to enable an informed opinion of the suitability of the proposed development.
- The EA lacks certainty and frequently uses the term indicative. In this regard there are no set locations of infrastructure works, delineation of construction techniques (e.g. trenching/ under-boring), no set monitoring regimes, and no emergency or management plan should the system prove to be detrimental to the environment.
- The EA appears to have not allowed for the creation of employment lands at Kembla Grange and Tallawarra. In this regard the impact of increased trade waste on overflow points and receiving waters should be addressed.
- The EA is ambiguous and often uses the word 'may'. (eg. p8, 1<sup>st</sup> paragraph). The application should outline exactly what is being applied for and clearly outline a staging strategy.
- The proposal area is inclusive of the wider Calderwood Valley area. Only a portion of this has had any assessment undertaken to determine suitability for urban

development (i.e. Calderwood Concept Plan Approval Area). It would appear premature to design or seek approval for a servicing strategy and subsequent infrastructure provision for this area prior to more detailed assessment.

- The proposed Calderwood reservoir has not been raised previously with Council at any discussions with either Sydney Water or the Department of Planning. Shellharbour Council may raise concerns regarding its location and possible impacts on various aspects of the environment.
- No detail is provided on how the Shellharbour WWTP will be upgraded to accommodate a 10% increase in dry weather treatment capacity.
- Locations of proposed ancillary components such as vent shafts have not been nominated. These may affect urban design of future subdivisions and should be indicated in the EA.
- Page 73 - Assessment approach: states that Sydney Water is seeking approval for:
  - The proposal to be located anywhere within the Field Assessment Area.
  - The proposal to be located outside the Field Assessment Area where environmental impacts are no greater than those in the EA and;
  - No additional environmental mitigation measures are required.

The Environmental Impact of such an application would be virtually impossible to determine. In this regard the EA and Approval requested in this statement do not comply with the DGR's.

- The justification of nutrient level increase based on unacceptable stormwater quality levels is not considered to be satisfactory. Optimum water quality should be sought even though existing systems may have poor water quality. On-going Improvements to stormwater quality are also a desired outcome from Councils perspective. This is particularly relevant for Lake Illawarra which currently suffers from poor water quality and regular algal blooms. Council, in conjunction with the LIA and Wollongong City Council, have in the past and currently, contribute substantial amounts of rate payers' funds towards the maintenance and improvement of the Lake. A zero or reduced impact on the water quality within Lake Illawarra would be councils preferred approach for new release urban areas within its catchment.
- Impacts on Barrack Swamp and Little Lake are not adequately addressed given the 14.01% increase in annual TN load and 10.19% increase in annual TP load in 2048. This is a popular swimming and recreation area and public health and amenity should be ensured.
- The possible impact of nutrient increase as a result of overflow on Lake Illawarra is of great concern to Council. The EA does not with any certainty or confidence ensure the ongoing health and viability of the Lake. This is relevant from a community recreational perspective as well as future commercial and tourism opportunities.

- The Environmental Impacts of the proposed vegetation removal of 3.4ha out of a total of 16ha i.e. 21.25% have not been adequately addressed nor specific affected areas identified. Areas of affected EEC's and threatened species affected need detailed assessment at this level of approval.
- The statement of commitments is ambiguous and tends to refer to future studies, design, and mitigation plans that actually should form part of the EA. More directed and measurable commitments are preferred.

In conclusion, Council would like to thank you again for the opportunity to comment on the EA and flag our initial concerns. If you require any additional information or wish to discuss any of the points raised in this submission please do not hesitate to contact me on (02) 4221 6127

Yours sincerely

Cheryl Lappin  
**Senior Strategic Planner**