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Attention: Ms Belinda Scott
Infrastructure Projects
Department of Planning & Infrastructure
GPO BOX 39
SYDNEY NSW 2001

APPLICATION	MP-2009/189
Date	7 November 2012

Dear Ms Scott

Subject: - Exhibition of Environmental Assessment for Water and Wastewater Servicing of the West Dapto Urban Release Area and Adjacent Growth Areas (09_0189)

I refer to the above proposal, to Council's letter of response to the initial project application dated 13 April 2012 and thank you for providing Council with the further opportunity to comment.

Please find attached Council's response to the Environmental Assessment exhibition.

Should you require any further assistance with regard to this matter please contact Geoffrey Hunt – Senior Development Project Officer direct on (02) 4227 7332.

Yours faithfully



David Farmer
General Manager
Wollongong City Council

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Wollongong City Council Response to the Environmental Assessment Exhibition for Water and Wastewater Servicing of the West Dapto Urban Release Area and Adjacent Growth Areas (09_0189)

Environment Strategy and Planning (ESP)

The Environmental Assessment for Water and Wastewater Servicing of West Dapto Urban Release Area and Adjacent Growth Areas has been prepared by Sydney Water and comprises four volumes with the inclusion of Appendices A to D. The reports have been reviewed and assessed on environmental grounds and found to be satisfactory.

As the proposed project will be carried on over a 35 year period and as the technology is rapidly evolving and changing the present assessment should not be considered as a fixed and unchangeable program of works. The environmental assessment should be a flexible and evolving document that is able to accommodate new procedures and techniques wherever an improvement in wastewater treatment and transfer can be achieved.

The following key issues: marine water quality, inland water quality, fauna and flora, soil and groundwater, noise and vibration, air quality, aboriginal and non-aboriginal heritages, flooding have been raised in the Director-General requirements.

Environmental issues to be considered by Sydney Water

During dry weather, the treated wastewater from the proposed development area will be discharged via ocean outfall, and under wet weather conditions, partially treated and untreated wastewater will be also discharged via ocean outfall at Shellharbour.

According to the numerical modelling undertaken to predicate exceedance of suspended solids and nutrients (total nitrogen and total phosphorous) in Wollongong and Shellharbour coastal waters, the mixing zone of the ocean outfall, indicates that at the completion of the project in 2048 there would be increases above the current levels for these parameters.

It is also expected that the levels of nutrients (TN and TP) levels in the inland waters and Lake Illawarra as the ultimate receiving system will be higher due to an increase in the number of direct and uncontrolled overflow points. The proposed development area will have a total of 49 points of directed overflows and 621 points of uncontrolled overflows, which all fall within the Port Kembla, Wollongong and Shellharbour wastewater treatment systems.

During a presentation and meeting of Council staff with Sydney Water Corporation (SWC) at the SWC head office in Parramatta, the issue of overflow control and offline containment of wastewater during extreme wet weather events was discussed. SWC indicated that although containment technology is available, the cost of implementing such technology would make the project financially unviable.

SWC proposes under boring or tunnelling techniques for some wetlands, and Category 2 and 3 drainage lines or streams to avoid disturbance of the existing natural systems. It would be preferable that the technique be systematically applied to all wetlands, drainage lines and creeks when drinking water or wastewater pipelines are laid.

The protection of shallow unconfined aquifers and their connection to riparian corridors should be ensured to prevent interruption of the base flow and maintain humidity in the riparian corridors. Council's ESP division endorses

The proposed measures to reduce disturbance, soil erosion, noise and vibration during the construction phases are satisfactory as are the proposed measures for site rehabilitation.

Any losses to Endangered Ecological Communities should be compensated for by the application of Bio-Banking principles for the entire proposed development area.

Design -Stormwater and Flooding

No objections raised subject to the proponent adhering to the draft statement of commitments as identified in the report.

Council Infrastructure and Traffic

The West Dapto urban release area will be undergoing significant development over the next 20-30 years with a number of new roads, substantial road upgrades and realignments proposed. It will therefore be essential that the proponent consults the Design and Technical Services Manager of Council prior to carrying out the staged works to ensure that the pipelines are placed within the correct position with regard to the future final alignments of these roads.

The Wollongong City Council Divisions of Infrastructure, City Works and Regulation and Enforcement must be included in any stakeholder or community consultation meetings. Sydney Water is requested to supply the names and contact numbers of the Contractor's representative for emergency situations and after hours contact. Details of the Programme of Works should be supplied to Council's Infrastructure, City Works and Regulation and Enforcement Divisions.

Sydney Water contractors should obtain consent, under Section 138 of the Roads Act from Wollongong City Council's Regulation and Enforcement Division 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. A traffic control plan prepared and implemented by a suitably qualified person should be submitted for approval and the appropriate fees paid a minimum of five working days prior to the expected implementation. The traffic control plan should satisfy the requirements of the latest version of Australian Standard AS1742 – Traffic Control Devices for Works on Roads and the RTA Traffic Control at Worksites Manual.

Note: This includes temporary road closures for the delivery of materials, plant and equipment, concrete pours etc should apply to Council's Regulation and Enforcement Division and obtain consent to carry out the restoration works, prior to the works commencing.

Sydney Water Contractors should not carry out any work other than emergency procedures to control dust or sediment laden runoff outside the normal working hours, namely, 7.00 am to 5.00 pm, Monday to Friday and 8.00 am to 4.00 pm Saturday.

Water and sewer mains should be located within the footpath area of the road reserve and not within the road carriageway except where road crossings are planned and inevitable. Water and sewer infrastructure such as reservoirs and pumping stations and should not be located within the road reserve but located within newly created lots in private property with easements or within public reserves.

All restoration works within road reserves, footpaths and public reserves etc should be carried out to Council's satisfaction and in accordance with Council's standard document, "Specification for Work within Council's Road Reserve." Asphalt restoration of road crossings should extend beyond the vertical alignment of the trench.

Under boring all road crossings must be used as the primary objective before alternative methods such as open trenching is implemented. During the design phase of the project, consideration should be given to minimise the number of road crossings required.

Where vehicular access is required to service any new infrastructure, the applicant should construct new concrete vehicular crossings to service this infrastructure across the footpath area of the road reserve in accordance with Council's current policies and standards. The applicant should arrange, through Council's Regulation and Enforcement Division for a Council qualified concrete contractor to carry out the works.

A copy of the approval should be submitted to Council prior to works commencing. The entire length of any vehicular crossings should be constructed:

- a) to Council's currently adopted standard drawings;
- b) for the full width of the footpath; and
- c) by one of Council's qualified concrete contractors at the developer's expense.

Council understands that there will be further opportunity to provide comment as this important critical infrastructure project assessment process evolves.

Council Property

No objections are raised to the proposed development subject to the water pipes where possible, being placed within the road reserves.