

Deana Burn

From: Andre Vernez <Andre.Vernez@shoalhaven.nsw.gov.au>
Sent: Tuesday, 31 January 2017 11:18 AM
To: Deana Burn
Subject: Shoalhaven Starches Modification 12 - Ethanol Distillery - COMMENTS FROM SHOALHAVEN CITY COUNCIL
Attachments: SW DA Notice - 3A07 1008 - N5 (MOD 12).pdf

Dear Deana,

Please find below comments from Shoalhaven City Council in relation to Shoalhaven Starches Modification No. 12 (Ethanol Distillery). 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. 12

Flooding Comments/Requirements:

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

1. The car park proposed at 171 Bolong Road is categorized as high hazard flood storage and the car park floor level needs to be high enough to ensure a velocity-depth product of less than $0.3\text{m}^2/\text{s}$ for a 1% AEP flood event. The applicant also needs to demonstrate that the parked cars won't be floating debris during a 1% AEP flooding scenario. In absence of acceptable solutions being met, the applicant needs to demonstrate how the safety can be ensured for this development.
2. An appropriate consulting engineers report to demonstrate that the buildings and structures can withstand forces of flood waters including debris and buoyancy forces up to the PMF scenario.
3. An updated flood evacuation plan taking the new developments into account is a requirement to demonstrate that the safe evacuation of people for the new developments is possible.
4. Standard flood related development controls for the high hazard flood storage category apply.

Traffic & Transport Comments/Requirements:

The main focus of this response is in relation to the proposed intensification of car parking in the vicinity of the BOC site.

The current proposal is to relocate those spaces that were to be provided at the Dairy Farmers site, to the BOC site, in order to generally comply with the intent of Condition 31(b) of the SEPP Approval 2009.

The comments made by Roads & Maritime Services in their letter to the Department of Planning & Environment dated 13 January 2017 have been reviewed and these are fully supported.

Council's Traffic Unit joins with RMS in calling for a plan that clearly demonstrates how "all" of the developments car park is proposed to be provided on site and in accordance with standards.

It is recommended that the applicant be requested to provide an overall plan outlining the location and number of all existing and proposed vehicle parking across the whole site; and that they demonstrate the parking complies with current development approvals and current standards including fully dimensioning each car park to allow an assessment against Australian Standards (as required by the relevant consent(s)). This will reveal any short comings that need to be addressed (package of outstanding works to be addressed).

Council's Traffic Unit also recommends the following:

1. A fully dimensioned and detailed car parking plan be provided demonstrating compliance with the relevant Australian Standards with application for a Construction Certificate. (See comments made above with respect to compliance with other consents that needs to be cross checked.)
2. If car parking is to be pursued on the BOC site, that:
 - i. The applicant provide a four leg roundabout to the satisfaction of Council and RMS in order to facilitate access to the BOC site and the adjacent car parking on the northern side of Bolong Road, and to link to the existing site access on the southern side of Bolong Road, currently accessed via the right turn bay.
 - ii. The applicant must address the access concerns including the intensification of right turn demand from the east and the intensification of illegal U-turn movements likely to be generated.

Provision of parking on the southern side of Bolong Road is preferred, subject to the location being accessed via an existing right turn bay, or where suitable passing provision can be provided.

However, consistent with earlier advice from Council and RMS, the construction of a roundabout at the adjacent access point would enable the access for the BOC plant to be relocated to the roundabout.

This would address the road safety and access concerns, including resolving the illegal U-turn activity which is an on-going concern, where drivers exiting the BOC car parking area then proceed to U turn at the site access just to the east and where only right turns into the Shoalhaven Starches site are permitted, not U turns in Bolong Road.

- iii. The applicant be requested to provide a fully dimensioned plan showing the car parking area in the vicinity of the BOC site that is the subject of this current development application. The plan must differentiate between existing and proposed parking spaces and road pavement, and must propose a sealed car park, including line marking and signage, all of which must be in accordance with Australian Standards.
- iv. The applicant must ensure that the carpark and its access is designed and constructed to comply with AS2890.1:2004 Parking facilities – Off street car parking; and AS2890.2:2002 Parking facilities – Off-street commercial vehicle facilities, and AS1158:2010 Lighting for Roads and Public Spaces, or their latest versions.
- v. The applicant provide details of all regulatory, advisory and warning signs and line markings that will be installed to denote the parking spaces and to assist with maintaining access and sight distances within the car park, at the proposed access with Bolong Road, and at the fire pump house. These should be shown on a detailed plan.
- vi. The applicant be requested to demonstrate via vehicle swept path analysis that the existing fire pump house may continue to be accessed via fire appliances and other service vehicles, with the proposed new car parking layout in place.
- vii. The applicant be requested to seal and line-mark the carpark to ensure the full parking capacity of the carpark may be achieved, instead of the current informal parking layout that is proposed.
- viii. The car park is not to be used for the storage of plant, equipment or materials at any time.
- ix. A continuous footpath must be provided along the frontage of the site (northern side of Bolong Road) from the BOC site access and extending west along the full frontage of the Shoalhaven Starches site.

Note: Council supports the request from RMS for improved pedestrian access.

- x. The applicant provide a 2 metre sealed shoulder on the northern side of Bolong Road, between the BOC driveway and the eastern boundary of the BOC site, to enhance safety for cyclists using the road shoulder.

The first location where eastbound cyclists return to Bolong Road after using the off-road path at the railway crossing is in the vicinity of the BOC site and there is a short section of missing shoulder in the vicinity of the BOC plant access.

Given the proposed intensification of the use of the BOC access point for the proposed carpark, a suitable condition would enhance road safety by resolving this squeeze point for cyclists.

- xi. The applicant provide works-as-executed plans to Council for any carpark upgrade works within 1 month of completion of the upgrade works, and to the satisfaction of Council. The carpark upgrade works are to be completed prior to construction commencing to alter the siting and type of evaporator approved under Modification No. 2.

Council's Traffic Unit remain very concerned regarding compounding outstanding works under the consent. It is noted that in a meeting with Mr Brian Hanley (Shoalhaven Starches) on 8 November 2016 it was stated that SS will be addressing all outstanding issues in the next modification. A meeting is foreshadowed (with relevant compliance officers from the Department) in the near future during which some of these issues will be explored. The ongoing applications, approvals and cumulative outstanding issues needs to be addressed. Council is happy to work with the applicant to achieve compliance and resolution.

(Council notes that the provision of works-as-ex drawings relating to all other works undertaken under the consent, sealing and line marking of all existing car parking appear to be outstanding.)

Council's Traffic Unit assessment of proposed car park location:

Car parking on the BOC site has never formally been approved by Council, RMS or the Department, due to concerns with traffic movements. The current car parking has occurred informally and is well utilised.

The current proposal now seeks to intensify and formalise the use of the site as a car park. This is not supported in the absence of a solution to address unacceptable traffic impacts.

A shortcoming of the proposal to provide more car parking on the BOC site is that this proposal intensifies the demand to access the car parking from the east, and there are no existing or proposed turnaround facilities at this location.

Accordingly, provision of parking on the southern side of Bolong Road is preferred, subject to the location being accessed via an existing right turn bay, or where suitable passing provision can be provided. This aspect is not addressed in the traffic impact assessment (TIA).

Another shortcoming of the proposal to provide more car parking on the BOC site is that this proposal also intensifies the demand for cars to exit the carpark by turning left into Bolong Road and then to U-turn at the adjacent access point (to travel back to the west – towards Nowra). U-turn movements are not permitted at that access, and the on-going illegal U-turn movements are a cause of concern and this needs to be resolved prior to approving this proposal. This aspect is not addressed in the TIA.

The traffic impacts could be resolved through the applicant constructing a roundabout at the adjacent access point leading to the Shoalhaven Starches operations on the southern side of Bolong Road, just east of the BOC driveway on the northern side of Bolong Road.

This would address the road safety and access concerns, including resolving the illegal U-turn activity which is an on-going concern, where drivers exiting the BOC car parking area then proceed to U-turn at the site access just to the east, where only right turns into the Shoalhaven Starches site are permitted, not U-turns.

These issues need to be addressed in the TIA and by way of amending the plans to address these issues.

Council's Traffic Unit assessment of proposed car parking layout:

The current proposal includes the redevelopment of the existing car parking in the vicinity of the BOC site. It makes mention of laying of additional pavement to provide for additional parking, however, clarification should be sought on the pavement type and extent.

The plan for the car park at the BOC site is shown on page 19 of the TIA (Drawing No. MN285-002J). It does not adequately detail the driveway location and width, the parking space and circulating aisle dimensions, whether the hard stand area is to be sealed, the extent and type of any additional road pavement and whether the spaces are to be line-marked.

The existing car parking spaces are unmarked and the current road surface is unsuitable for line marking of spaces. Where informal, unmarked parking is provided, the capacity of car parking areas is reduced compared to spaces that are able to be marked.

The plan for the new parking does not provide sufficient details in regards to vehicle swept paths to ensure turning movements may be undertaken safely and efficiently.

Confirmation is also required, via vehicle swept path analysis, that access to the existing fire pump house by fire appliances and other service vehicles will be maintained in order to provide access.

Details of any regulatory/warning signs to assist with maintaining access and sight distances in the vicinity of the pump house and within the car park should be shown on the plan.

The plan for the proposed car park at the BOC site shows a total of 83 (46+37) car spaces. This provides an apparent discrepancy of 23 spaces. The TIA does not identify whether the required 60 additional spaces that were to have been provided at the Dairy site, but are now intended to be located at the BOC site, will in fact all be provided for at the BOC site, or whether some have been absorbed into existing car parking spaces at the BOC site.

The existing car parking positioned along the southern boundary of the BOC site appears to be able to accommodate 20 cars, however, 23 cars are shown on the current plan. It is unclear what works are proposed to accommodate these extra vehicles.

Similarly, on the northern side of this car park there is currently space for approximately 12 vehicles, however, 14 vehicles are shown on the current plan.

The TIA does not specify how these additional 5 parking spaces are to be provided. It makes mention of “re-laying of additional pavement for parking purposes” [p18], however, the extent of the larger car park is not adequately documented on the current plan.

The plan indicates those spaces coloured in magenta are part of an “Original Mod 2 Approval”, however, these appear to be randomly positioned throughout the proposed car park.

Council's Traffic Unit assessment of operational traffic analysis:

The analysis should apply the additional traffic volumes generated by the carpark to the current traffic volumes in Bolong Road to determine the full impacts of the proposal, rather than attempting to use hypothetical modelled volumes for Bolong Road post completion of the Berry bypass.

Council does not support the use of 2017 modelled traffic volumes and considers that actual 2017 seasonal volumes should be used as a baseline for assessing the traffic changes.

Council does not agree that the modelled traffic predictions for a significant reduction in traffic using Bolong Road on completion of the Berry bypass will eventuate, given that a large proportion of traffic will continue to use Bolong Road in preference to the Highway in order to avoid the ongoing delays on the Highway through Bomaderry and on the approach to the Nowra Bridge.

Observations on site indicate a number of vehicles appear to be using the large diesel tank located on the Dairy site, resulting in additional traffic generation and turning movements along Bolong Road. This is not

identified in the TIA and it is recommended that the Proponent be requested to provide details on the number of vehicles accessing this tank.

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:

1. Shoalhaven Starches is the holder of Environmental Protection Licence #883, issued by the NSW Environmental Protection Authority (EPA). Having regard to this, Environmental Services concurs with the methodology, findings and recommendations of the following reports, which should be referred onto the EPA for their perusal and assessment.
 - Air Quality Impact Assessment prepared by GHD Pty Ltd (dated 10 November 2016, Reference No. MAN001).
 - Environmental Noise Impact Assessment prepared by Harwood Acoustics (dated 16 November 2016, Reference No. 1608003E-R).
 - Stage 1 Contamination Assessment, ASS Investigation and Riverbank Stability Assessment prepared by Coffey Services Australia Pty Ltd (dated 7 November 2016, Reference No. ENAUWOLL04315AA-R01 Rev 2).

Development Engineering Comments/Requirements:

1. Typically the overland flow path of stormwater running off from Manildra's whole development site will need to be checked by Manildra to ensure that the environment has little to no pollution, erosion or impact.
2. Construction Vehicle Parking has been the biggest issue for Manildra and needs to be addressed and dealt with properly as part of these applications. Accordingly, a detailed construction management plan should be required as a condition of consent, prior to either the Construction Certificate being issued or the commencement of works.
3. The outstanding works required to be completed by Manildra in particular across the frontage of the Old Dairy Farmers site should be resolved.

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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