

8 March 2022

Our Ref: N26754

Mr Stephen Richardson  
Cowman Stoddart Pty Ltd  
PO Box 738  
NOWRA 2541

Dear Stephen,

**SHOALHAVEN STARCHES MODIFICATION 21  
COMMENTS FROM SHOALHAVEN CITY COUNCIL**

I refer to the email from Andre Vernez (Shoalhaven City Council) to Shaun Williams (Planning NSW) dated 3 March 2022 and respond as follows:

1. Stormwater Quality

SCC DCP Chapter G2 (Ch G2) specifies the stormwater pollutant removal standard for Sydney Water Drinking Catchments is a Neutral or beneficial Effect (NorBE). In other words, no net increase in stormwater pollutants relative to pre-developed conditions.

WaterNSW applies the NorBE standard to developments in other local government areas which are within a Sydney Drinking Water Catchment (Using MUSIC in Sydney Drinking Water Catchment – A Water NSW Standard 2<sup>nd</sup> ed, 2019).

Ch G2 requires an arbitrarily higher stormwater quality standard for those catchments which are NOT Sydney Water Drinking Catchments.

Table 3 of Ch G2 requires the reduction of suspended solids (TSS) by 80%, reduction of nitrogen (TN) by 45% and reduction of phosphorus (TP) by 45% in catchments which are NOT Sydney Water Drinking Catchments.

The Performance Criteria P10 on page 14 of Ch G2 is for large scale development to mitigate adverse impacts by:

- a. *Minimising post development pollutant loads to not unduly impact on the quality of receiving waterways,*
- b. *Protecting stream stability and habitats through retention, infiltration and detention to limit post development flows.*

Although the numerical standard of Table 3 cannot be achieved on this site the Integrated Water Cycle Management Strategy (IWCMS) meets Performance Criteria P10.

In relation to *Minimising post development pollutant loads to not unduly impact on the quality of receiving waterways*, the IWCMS satisfies Performance Criteria P10 in that TSS will be reduced



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by 80%, TN will be reduced by 29.8% and TP reduced by 29.6% relative to the potential stormwater pollutant load generated by site operations (Refer to IWCMS Table 3.3, p10).

Further, the ICWMS meets the NorBE standard as applied to Sydney Drinking Water Catchments (Refer to IWCMS Table 3.4, p10).

In relation to *Protecting stream stability and habitats through retention, infiltration and detention to limit post development flows*, the IWCMS satisfies Performance Criteria P10 in that peak 1% AEP discharge from the site is reduced from 2.37 m<sup>3</sup>/s to 1.4m<sup>3</sup>/s (Refer to IWCMS Table 4.1, p11).

## 2. Stormwater OSD

Drawing N26754 SK14-3 has been modified to include a typical section and depth of ponding.

Given the operational site will be strictly controlled to ensure that employees and visitors, and indeed trespassers, are not at liberty to wander over the site. An 'Out of Bounds' area is not unusual for a site of this nature.

Maintenance of the swale and OSD area will simply involve vegetation management using handheld mowers and/or edge trimmers. Simple vegetation management actions will be integrated into the overall maintenance plan and associated Safety Plan for the Packaging Plant precinct.

Drawing N26754 SK14-3 has been modified to include a pool type safety fence in order to comply prevent accidental entry into the OSD. That part of the OSD in which depth of water exceeds 0.3 m will be fenced.

Yours faithfully  
ALLEN PRICE & SCARRATTS PTY LTD

Wal Mullany  
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