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Our reference: DOC14/259540
Contact: Calvin Houlison
4224 4179

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Dear Ms Flanagan

RE: Kembla Grange Resource Recovery Centre EIS Exhibition (SSD 5300)

Thank you for the opportunity to comment on the EIS for the Kembla Grange Resource Recovery Centre which is currently on public exhibition. As per previous correspondence, we are generally satisfied that the application has addressed the environmental requirements outlined in the DGR's, as follows:

- The proposal is unlikely to result in a significant impact upon any threatened species, endangered population or endangered ecological community (EEC) as the vast majority of works are contained within the cleared portion of the site. The areas of remnant vegetation, including EEC's, are to be retained and protected as part of the proposal. Therefore the ecological impacts will be minimal, especially if the recommended mitigation measures outlined in the application documentation are implemented.
- DPE should be satisfied that the floodplain management and water quality matters raised previously have been addressed. This includes contingencies related to the performance of stormwater infrastructure to minimise impacts on Lake Illawarra sensitive receiving waters should design rainfall be exceeded. These include the shredding runoff pond, water recycling pond and detention basins A and B.

Biodiversity

Vegetation management and rehabilitation of the riparian zone on the site identified by Clause 7.4 of Wollongong LEP 2010 has been underway since August 2013 and is well progressed. The works being undertaken in accordance with the Vegetation Management Plan (VMP) prepared by Southern Habitat (June 2014) will improve the ecological value and function of the riparian zone. It is worth noting that the VMP currently has a two year maintenance period attached to it which will ensure it is managed appropriately for that period of time, however without ongoing management beyond the maintenance period it is likely to suffer future degradation.

In order to ensure the ongoing function and viability of the riparian zone and habitat connectivity it proposes to maintain, we recommend that the riparian zone be maintained in perpetuity by an appropriately qualified

and experienced bush regenerator. The maintenance measures outlined in the VMP could simply be extended to cover a longer period of time.

In order to minimise any adverse ecological impact, the recommendations and mitigation measures outlined in the application documentation (SEE, VMP and Flora & Fauna Assessment) should be imposed as conditions of consent. Particular reference is made to the measures outlined on page 205 of the Statement of Environmental Effects (TCG, 2014) and the recommendation of Southern Habitat to fence the small Illawarra Subtropical Rainforest remnant (Section 3.5, page 21 of the VMP). If the mitigation measures are implemented, the proposal is unlikely to have a significant ecological impact.

Flooding

OEH has conducted a review of the Flood Analysis Review (KFW, 2013) and Addendum 2D Flood Report (KFW, 2014) respectively, and suggest the determining authority be satisfied that the following matters have been adequately addressed with relation to floodplain management:

- The impact of flooding on the potential development (including overland flow)
- The impact of the potential development on flood behaviour (particularly topography changes) including any management measures to mitigate adverse flood impacts
- The impact of flooding on the safety of people/users of the development including flood hazard on access routes and access requirements in times of flood
- The full range of flood events, up to and including the PMF.

From the information available to OEH, consideration should be given to these issues in their entirety, particularly with regard to the management of potential downstream adverse flood impacts and flood isolation hazards. It is unclear whether adequate consideration has been given to contingencies related to the performance of stormwater infrastructure should design rainfall be exceeded. It is recommended that a risk management approach be developed in line with current engineering best practice to minimise impacts on the environmentally sensitive receiving waters of Lake Illawarra.

Please do not hesitate to contact me on 4224 4179 or e-mail calvin.houlison@environment.nsw.gov.au should you wish to discuss this matter further.

Yours sincerely



CALVIN HOULISON
Conservation Planning Officer