TOOKER+ ASSOCIATES

EG Property
Governor Phillip Tower
Sydney NSW 2000
Attn: Dr S. Geha

5 May 2022

Dear Sir,

Planning Proposal
1411 The Northern Road, Bringelly
Rezoning for Service Station and Industrial Units
Onsite Sewage Wastewater Management

EG Property propose to rezone the site at 1411 The Northern Road Bringelly to allow development of a service station and small scale industrial units (refer Figure 1). The site has an area of approximately 21,000m2. A pre Planning Proposal meeting was held with Liverpool City Council on the 25 November 2021 to discuss the contents for a Planning Proposal for the proposed rezoning. Liverpool City Council provided a letter response dated 13 December 2021 which outlines their comments and requirements for a Planning Proposal.

This letter deals with the onsite sewage wastewater management issues to be addressed in the Planning Proposal. It is noted that the site is yet not serviced with Sydney Water sewerage infrastructure and the rezoning would propose a temporary onsite sewage wastewater management system until the Sydney Water infrastructure was provided.

Any onsite sewage wastewater management system proposed for the site would comply with the Liverpool City Council Onsite Sewage Management Standard 2021, the Sydney Catchment Authority 2012, Designing and Installing Onsite Wastewater Systems and the NSW Health 2001, Septic Tank and Collection Well Accreditation Guideline.

In Appendix A to the Council's letter in the section under the heading "Site Specific Merit", Council indicates some concerns about an onsite wastewater management system on the subject site. These concerns relate to the farm dam on the site, slope and natural drainage on the site and design flow rates. These concerns are not valid due to the reasons as discussed below.

The site development (see Figure 1) will require reshaping of the land to form flat building pads for the service station and the industrial units. This reshaping would remove the existing dam from the site. This reshaping would also remove the slope and natural drainage paths on the site. The development would include a pipe stormwater system to control runoff on the site and the building pads would have to be slightly raised to ensure overland flows on the site did not inundate the industrial unit floors. As such, any irrigation bed used to manage disposal of treated sewage would not be subject to overflows from elsewhere on the site. The bed would be flat and thereby maximise the treatment and absorption area. The design flows would influence the type of treatment system selected and the size of any irrigation bed required.

For any temporary onsite sewage management system onsite, the construction of the industrial sheds along the southern boundary of the site would be postponed and the building pads used as the treatment bed. There is an area of up to 4600m2 available which would be ample for this treatment bed and its size would allow compliance with all the Council's setback distances in their guideline. There is also an option to use an aerated treatment system which would reduce the area

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required for the treatment bed. This treatment bed could be constructed with appropriate soils which improve the treatment potential to further reduce its area. If necessary, the treatment bed could also be extended along the eastern and western boundaries in the areas designated for industrial units. This would increase the area available for the treatment bed to 9300m2. As such, there should be no concern at the Planning Proposal stage about providing sufficient treatment area for a temporary onsite sewage management system for the proposed development.

The site is located on a crest and the onsite sewage management system would not be adversely influenced by flooding and overland flows. It would also not be located in a natural depression.

In Appendix B of Council's letter, it details the site testing requirements which will be required for any Development Application. This is not relevant to the Planning Proposal being addressed in this letter. However, any testing required on the existing site in terms of soil depth, type and nutrient removal/water absorption rates would be not be necessary because the site will be reshaped and soils imported onto the site. The characteristics of these soils for any temporary treatment area could be specified in the development application and in the development consent conditions. Likewise, the area and treatment type could also be specified in the development application and in the development consent conditions.

In summary, the Council concerns expressed in their letter dated 13 December 2021 regarding the proposed temporary onsite wastewater management system is misplaced when considering a Planning Proposal when there is site shaping required on site, importation of soils with enhanced treatment and absorption characteristics, removal of the site dam, reshaping of existing slopes, extensive areas available for treatment and a range of treatment types available to minimise the required treatment areas. Testing of existing soils on site is not appropriate given the extent of reshaping and movement/importation of soils on the site.

Yours sincerely

Mark Tooker
Director

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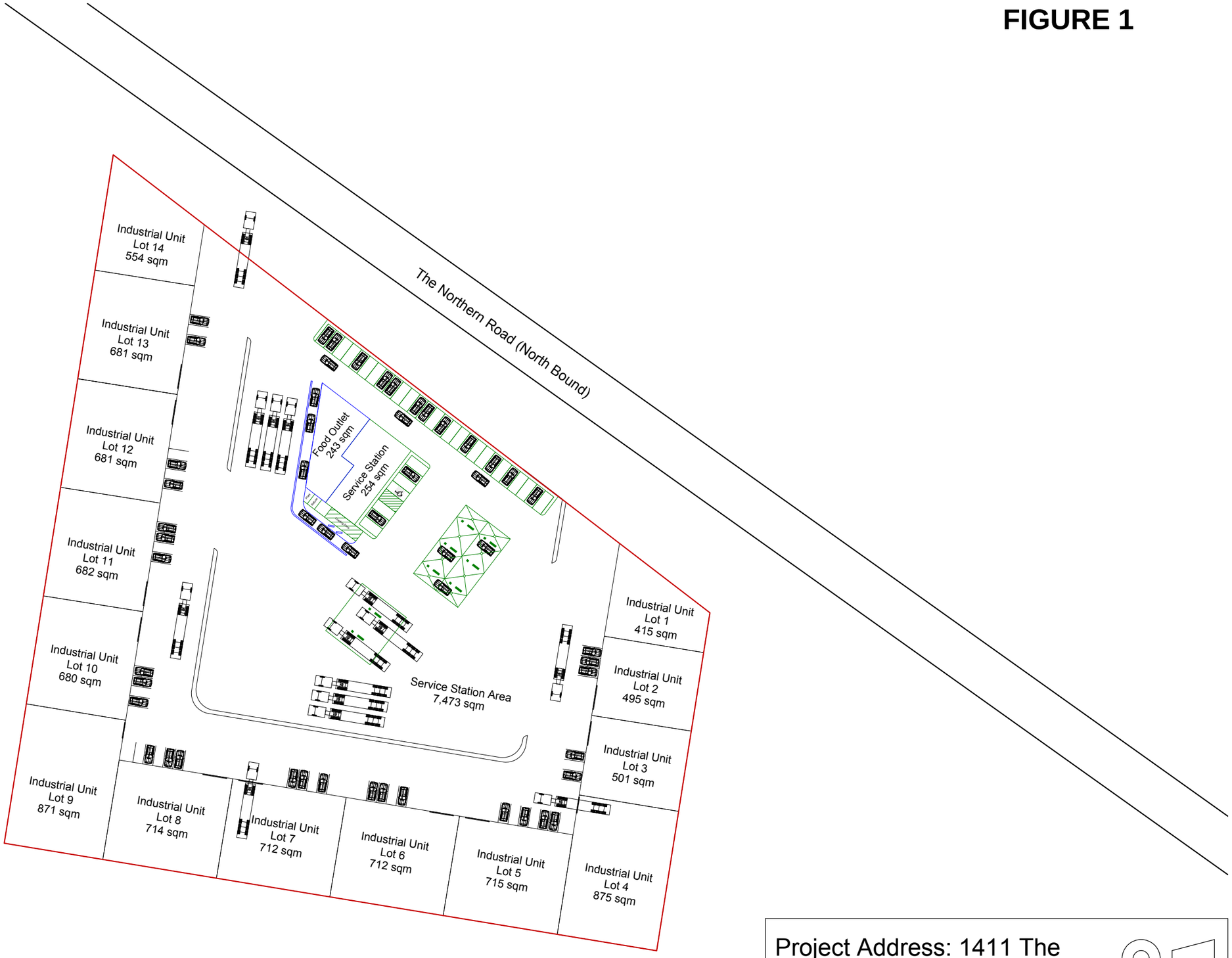
FIGURE 1



Project Address: 1411 The Northern Road, Bringelly

EG

Drawing Name : Site Plan 3A

Drawn By: Jason Chen

Scale: 1:1000

Date: 31/3/22