

Brad Lane

From: Richard Spain
Sent: Monday, 15 March 2021 1:18 PM
To: Brad Lane
Cc: Daniel Walsh
Subject: Referral for DA2021/056 - Seniors Housing

Hi Brad,

I do not think this development is viable as it is currently proposed. Whilst Council urban sewer and water network is in relatively close proximity to the proposed development site there are major issues associated with integrating the required water and sewerage services to that network.

The area in which the development is proposed is zoned RU1 and forward planning for water and sewerage infrastructure has never considered this area in terms of future development that would be connected to Council's water and sewerage infrastructure. This means that Section 64 contribution calculations for future upgrades to sewerage and water infrastructure have not included any upgrades required to service this area.

The closest sewerage infrastructure serves the current outer urban area of Macksville and is not of sufficient size to cater for the proposed development. Major pump station, rising main and gravity sewer upgrades would be required to accommodate the increased sewer load. The upgrades would most likely impact 3 existing sewerage pump stations and the cost would be significant.

Similarly the closest water mains are 100mm in dia. and the preliminary infrastructure plans nominate a 200mm dia. main to service the development. The existing infrastructure will not have the capacity to provide this volume of water.

The cost of the upgrades required would appear to be prohibitive for the developer to fund.

The only way I can see the development being viable is if they install and operate their own site package sewage treatment system. Similarly water may be able to be provided to an on site storage reservoir and booster pumping system owned and operated by the property owner.

Richard Spain

Manager Water and Sewerage

Nambucca Valley Council

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Brad Lane

From: Brad Lane
Sent: Tuesday, 8 June 2021 9:30 AM
To: 'daniel@dmpps.com.au'
Cc: Daniel Walsh; Richard Spain; Michael Coulter; Johann Mouton; Mal Spears; Ron Pomeroy
Subject: Package Treatment Plant Concerns

Hi Daniel, further to our meeting on Friday, please find below some of the concerns with a stand-alone, privately operated sewerage treatment plant at the site:

- What is the design life of the plant?
- How will it be practically staged to scale up with staging of the proposed development?
- How easily can it be upgraded / renewed?
- What role does the supplier play in ongoing servicing and maintenance?
- What level of operational involvement is required by the development (how many man hours per day/ who performs this role)?
- What are the licence requirements?
- Who does the operator report to?
- How will the private operator ensure adequate monitoring?
- Who is responsible when something goes wrong with the infrastructure?
- What happens in the event of a failure in terms of storage and repair response time?
- Where is the sludge planned to be disposed? The local tip may not accept it.
- What is the required irrigation area for the maximum loading taking into account slope, water table, soil type and rainfall? Calculations required.
- Where these irrigation or evapotranspiration areas will be. Council will require a concept plan which shows these areas and any required reserve area.
- How is the volume of treated water irrigated during periods of extended wet weather?
- How is the operation and emergency response to the plant affected by flood events?
- What are the physical dimensions of the plant including all ancillary tanks, access and fencing required to service the entire development?
- What are the visual impacts of the plant? Plans required.
- What are the odour impacts of the plant?
- Are there any examples of a plant being used in the same application i.e. coastal residential development of this size? Resorts / mining are a bit different in that they have the resources to put into operation and maintenance.
- The scale of the development is not insignificant. The privately operated plant would service a large number of dwellings and an aged care facility. What is the annual operating cost and how will the aged care facility provide the technical, financial and organisational capacity to operate, maintain and plan for renewal of the plant?
- What is the proposed arrangement should, for whatever reason, the operator of the site only partially complete development or become insolvent and abandon the completed site?

You mentioned in the meeting that the packaged sewerage treatment plant would be below the capacity which would be considered designated development. It is noted that in order to locate the plant more than 100m from the proposed residential uses, it would appear that the plant would be on a flood plain. A sewerage system that has an intended processing capacity of more than 20 persons equivalent capacity or 6 kilolitres per day and are located on a flood plain would normally be considered designated development. Given that an on-site system for the proposal would service 280 dwellings and an aged care facility, it is substantially above the designated threshold for a sewerage system, save Clause 37A of Schedule 3 in the EP&A Reg. Investigations of potential environmental impacts of the proposal should be provided.

Regards,

Brad Lane
Senior Town Planner
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Online switch for Submission of Development related Applications

From 1 July 2021 the following list of development related applications and post consent certificate applications must only be submitted to Nambucca Valley Council through the NSW Planning Portal.

- **Development Applications (DA)**
- **Application to modify a DA**
- **Request to review a DA**
- **Complying Development Certificate**
- **Construction Certificate**
- **Occupation Certificate**
- **Subdivision Works Certificate**
- **Subdivision Certificate**
- **Building Information Certificate**

The applications listed above will no longer be accepted in any other method than through the NSW Planning Portal from 1 July 2021.

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Brad Lane

From: Richard Spain
Sent: Monday, 30 August 2021 5:43 PM
To: Brad Lane
Subject: DA2021/056 - Water and Sewer Information

Brad,
I have reviewed the information provided and have the following comment.

I don't think water supply is a major issue. Appropriately sized on site tanks and pumps will be required and these will be operated and maintained by the facility.

I do not think it is feasible to cater for this development by providing a Council owned dedicated pump station and rising main with discharge direct to the treatment works.

The on site sewage treatment requirement is significant in size with an ultimate load of 960 EP or 170 kL /day. I accept that the proposed plant can produce a Class A effluent but still have a few concerns in relation to the following:

Who is responsible for compliance and what happens if targeted effluent concentrations are not met. The EPA have advised that the size of the plant is below their licencing threshold. That is it does not require an EPA licence and they have no role to play. Does this means that Council will be responsible for compliance and if so what is the recourse on Council if licence conditions are not met.

It is not clear how the disposal of sludge will be handled as I don't believe that the tip will accept it. This would need to be clarified and disposal agreements put in place.

How is the renewal / replacement of the plant going to be managed? A life span of around 25 years is suggested. What happens after that? Who polices the facility management to ensure that they have managed their finances to ensure that funding will be available when the time comes around for renewal works.

Regards

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From: Brad Lane <Brad.Lane@nambucca.nsw.gov.au>
Sent: Monday, 30 August 2021 3:07 PM
To: Richard Spain <Richard.Spain@nambucca.nsw.gov.au>
Subject: DA2021/056 - Water and Sewer Information

Hi Richard, have you had a chance to review the revised information regarding the water and sewer arrangements for the proposed development?

Regards,

Brad Lane
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