



Response to Submissions Report for Tripoli Way Extension

Albion Park

Shellharbour City Council

76 Cygnet Avenue
Shellharbour City Centre, NSW

Prepared by:

SLR Consulting Australia

SLR Project No.: 660.030219.00000

20 August 2024

Revision: 2.0



Shellharbour
CITY COUNCIL

Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
1.0	17 July 2024	Alanna Ryan	Rob Dwyer	Rob Dwyer
2.0	20 August 2024	Alanna Ryan	Rob Dwyer	Rob Dwyer

Executive Summary

This Response to Submissions (RTS) Report has been prepared by SLR Consulting (SLR) on behalf of Shellharbour City Council (Council) in support of the activity for the construction and operation of the Tripoli Way Extension (TWE) at Albion Park. The exhibition of the Environmental Impact Statement (EIS) for the Activity ended on 28 June 2024. This RTS should be read in conjunction with the submissions received from government authorities and members of the public.

The construction of the TWE, to be located along the northern periphery of the Albion Park Town Centre, offers the potential to relieve traffic levels along Tongarra Road, which would then enable significant opportunities to implement verge and streetscape improvements within the core Town Centre area.

The Project, herein referred to as “the Activity”, will involve the construction and operation of the TWE and once constructed the primary function of the Activity will be to alleviate the impacts of traffic growth along Tongarra Road, ease traffic congestion within the Albion Park town centre, increase the safety of roads within Albion Park, support development and provide a valuable addition to the transport network.

Planning Framework and Assessment

The Activity is permitted without consent under the *State Environmental Planning Policy (Transport and Infrastructure) 2021* (Transport and Infrastructure SEPP), with Council required to prepare an EIS for the Activity to ensure all environmental and social matters are appropriately considered under Part 5, Section 5.7 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) with Council being both the proponent and the determining authority.

This RTS seeks to address each of the issues raised during the exhibition of the EIS by government authorities and members of the public.

Submissions Received

This RTS provides a response to submissions received from Transport for NSW (TfNSW), and eleven (11) public submissions.

No changes to the Activity are proposed as a consequence of addressing the issues raised in the submissions. Amendments have been made to mitigation measures for the Activity and the amendments suggested will be addressed within the Construction Environmental Management Plan.

Assessment of EIS and Activity

The material provided in the EIS, and the supporting assessment material provided in this RTS Report are submitted to Council to finalise the assessment of the Activity. The EIS and the RTS Report provide sufficient documentation to enable approval of the Activity, refer to Section 7 - Declaration and Approval.

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1.0 Introduction

This Response to Submissions Report (RTS) Report has been prepared by SLR Consulting Pty Ltd (SLR) on behalf Shellharbour City Council in support of the proposed activity (the 'Activity') to develop the Tripoli Way Extension (TWE) at Albion Park, a road which would traverse and extend Tripoli Way and The Expressway running east / west and parallel to the north of Tongarra Road/Illawarra Highway.

The Environmental Impact Statement (EIS) for the Activity was exhibited from 29 May 2024 to 28 June 2024. A total of twelve (12) submissions were received. Eleven (11) of the submissions were classified as "comments" or "supports" and one submission opposed the Activity.

The RTS Report has been prepared generally in accordance with the Department of Planning and Environment *State significant development guidelines – preparing a submissions report*, March 2024.

1.1 Overview of the Project

The construction of the TWE will extend the existing Tripoli Way and The Expressway alignment which runs parallel and to the north of Tongarra Road/Illawarra Highway. It will connect to Terry Street in the east and Tongarra Road/Illawarra Highway at the Broughton Avenue roundabout in the west, refer to Figure 1.

The proposed Activity will deliver improved traffic flow through Albion Park. Increased traffic within the surrounding areas of Albion Park, Tullimbar and Calderwood has increased congestion and decreased amenity.

The TWE was conceived as early as the 1960's, as evidenced by the land zoning shown in the then 'Illawarra Planning Scheme, 1961'. Since this time the alignment has undergone some minor amendments, however the intent remains consistent which is to alleviate traffic congestion through the surrounding areas.

The Activity will extend the existing Tripoli Way alignment to connect arterial roads, Terry Street and Broughton Avenue / Tongarra Road (Illawarra Highway) without directly passing through Albion Park Town Centre. The TWE includes the full length of these existing access roads and extends east and links them to the Albion Park Rail bypass and west into Tongarra Road (Illawarra Highway) at the roundabout on Broughton Avenue. The extension and linkages will be mainly through undeveloped rural properties with design objectives to limit impact on the environment and existing residential lots.

Once completed the TWE will be approximately 1,975 metre (m) in length and will have a speed limit of 60 kilometres (kms) per hour.

Figure 1: Local Context and Activity Area

1.2 The EIS As Exhibited

The EIS as exhibited sought approval for the following works.

- Road widening of the existing Tripoli Way formation to allow four (4) travel lanes (two in each direction) for the section of Tripoli Way east of Calderwood Road to Terry Street.
- Construction of a new section of Tripoli Way west of the intersection with Calderwood Road, consisting of two (2) travel lanes (one in each direction with turning lanes) to the existing Broughton Avenue / Illawarra Highway roundabout, with capacity to upgrade to four (4) lanes in the future. Construction of this new section will include a four (4) lane bridge crossing Hazleton Creek. The bridge will have an overall length of approximately 52 m and three-span in order to cross the creek and minimise impacts to flood depths, velocity and minimise impacts on the riparian corridor.
- Works on Hamilton Road to the north and south where it intersects with Tripoli Way.
- Works on Calderwood Road to the north and south where it intersects with Tripoli Way.
- Construction of a 2.5 m shared path between the Broughton Avenue / Illawarra intersection and the Hamilton Road intersection on the northern side.
- Construction of 1.5m footpath on the northern side between Hamilton Road and Terry Street.
- Construction of a footpath (variable width 1.2-1.5 m) on the southern side of the new road.
- Three signalised intersections from Calderwood Road to Terry Street.
- Drainage works consisting of a formalised stormwater pit and pipe network and open swales to ensure sufficient drainage capacity.
- Associated street lighting, noise abatement structures and landscaping.
- Temporary ancillary construction facilities, creek adjustments and works to facilitate construction of the work.
- Operation of the TWE.



2.0 Analysis of Submissions

This section of the RTS analyses the submissions that have been received. It identifies the groups and people who made submissions and categorise the issues raised in submissions. The analysis of submissions is for information purposes only.

2.1 Listing of Submissions

A listing of the submissions received, and key details are outlined in Table 1 below. Figure 2 provides a summary of the total number of submissions who oppose, support, or commented on the activity.

Table 1: Breakdown of Submissions

Submission Category	Submission Group / Person	Community Interest Level	Submission Type
Agency	Transport for NSW	Regional (5-100km from the site)	Comment
Organisations	Lendlease Communities Calderwood Pty Limited (Lendlease)	Local (<5km from site)	Support
Individuals	Emily Greig	Local (<5km from site)	Support
	Arthur Weeding	Local (<5km from site)	Support
	Lorraine Quinlan	Local (<5km from site)	Support
	Ryan Franks	Local (<5km from site)	Support
	Glen Evans and Corey Evans	Local (<5km from site)	Oppose
	Mesha Aroutsidis	Local (<5km from site)	Comment
	Dane Parnaby	Local (<5km from site)	Support
	Clinton Down	Local (<5km from site)	Support
	Lindsey Adam	Local (<5km from site)	Support
	Josh Vaughan	Local (<5km from site)	Support

Figure 2: Total Number of Submissions that Oppose, Support or Commented on the Project



3.0 Actions Taken Since Exhibition

Council has received submissions and this RTS represents consideration of the issues raised. No changes have been proposed to the Activity since public exhibition.

The detailed design for the Activity has progressed since exhibition. The detailed design changes will be generally in accordance with the concept design and within the Activity Area.

4.0 Response to Submission

This section provides a detailed summary of the response to the issues raised in submissions.

4.1 Response to TfNSW Key Issues

Following its initial assessment of the Activity, Transport for NSW (TfNSW) provided a number of comments in an email to Council on 28 June 2024. Table 2 below provides a response to each of the comments / issues.

Table 2: Response to Transport for NSW Key Issues

Comment / Issue	Response
Construction Traffic Access	
Section 3.4 of the EIS, Site Access and Egress, outlines that construction access will be via existing local roads. Figure 8 identifies that construction access will be via the Illawarra Highway near both Taylors Lane to the north and Broughton Avenue to south. There are limited details on the access arrangements at either of these locations proposed in the EIS. TfNSW believes that any construction access to the state road network will need to include temporary traffic control arrangements or upgrades to the Highway at the accesses, to limit the disruption to the Highway; these matters must be adequately considered as part of the EIS.	Updated mitigation measures relating to construction traffic are contained in Appendix B (refer to Column - Code T2 within Appendix B). The Council will ensure the preparation of a Traffic Management Plan prepared by a suitably qualified traffic consultant. The Traffic Management Plan will include all impacts of construction access points including construction access from the state road network and including temporary traffic control arrangements to limit the distribution to the Highway. Council has been in regular liaison and direct consultation with Transport for NSW regarding the issue raised and will continue to do so moving forward.
Appendix U, the Traffic and Transport Impact Assessment, dated 19 July 2021, does not include any details on construction access from the state road network.	This comment has been addressed in the response above.
The environmental assessment for the Tripoli Way Extension project should consider all the impacts of the construction accesses proposed, including but not limited to the traffic impacts and what mitigations or measures are required.	This comment has been addressed in the response above.

4.2 Response to other Submissions

One (1) submission was received from a business entity (Lendlease) during the exhibition of the EIS. Comments provided by Lendlease are listed in Table 3 with a response to each issue provided in Column 2.

Table 3: Response to Lendlease Key Issues

Comment / Issue	Response
Tripoli Way Exhibition Documents	
We noticed Council's drop-in sessions featured the Tripoli Way "Concept Design 30%" plans by consultants Indesco. We have since found these plans were not included during the exhibition period on Council's Let's Chat exhibition website (https://letschatshellharbour.com/tripoli-way-extension-project). We make this observation only for procedural reasons noting Council's commitment to deliver on the project in accordance with the Environmental Impact Statement as exhibited.	Noted. The EIS and associated appendices are the documents that Council sought comment upon. Other supporting material used at the drop-in sessions are not documents that Council sought comment on. The detailed design changes will be generally in accordance with the concept plan and within the Activity Area.
Adjoining Road Network	
Lendlease is responsible for upgrading an adjoining section of the road network at Calderwood Road. The upgrade will be delivered in accordance with an executed Deed between Shellharbour Council and Lendlease and is to be complete prior to 31 December 2027. Lendlease is in discussions with Council to accelerate the delivery of Calderwood Road to coincide with the operation of the Tripoli Way Extension and future community infrastructure including the new Calderwood School and Sporting Fields. Coordination meetings are being held between Lendlease and Council toward this outcome to reconcile delivery programs, construction logistics and project interface items. We wish to acknowledge Council for the professional and constructive format of the discussions and request that the dialogue be given ongoing support.	Noted. Council will continue to engage with Lendlease in relation to their Calderwood development.
Funding Sources and Allocation	
Lendlease would like to better understand the overall funding sources of Tripoli Way in the context of the developer contributions, past and present, made by Lendlease. Clearly Council does not seek to obtain funds from multiple sources for the same scope of works, in effect double-dipping on contributions. We request a separate forum with Council to explore the funding from Lendlease, developer contribution schemes, Council reserves, government grants and other sources so that we can satisfy Lendlease governance obligations regarding infrastructure contributions.	Noted. Council can assure Lendlease that it is not "double-dipping" on contributions. Council will provide this assurance at any future meeting with Lendlease in relation to their Calderwood development.

4.3 Public Submissions

Ten (10) submissions from individuals were received during the exhibition. One (1) submission provided comment on the Activity, one (1) submission opposed the Activity and eight (8) submissions supported the Activity. Table 4 below provides responses to the comments / issues.

Table 4: Response to Public Submission - Issues

Comment / Issue	Response	Oppose or Support / Comment
Whilst I appreciate this will cause adverse outcomes for the local land owners this TWE has been in the pipeline for decades and must proceed immediately. The increased population of the 2527 suburb can no longer efficiently manage the traffic without the construction of TWE.	Noted. One of the main aims of the TWE is to alleviate traffic and congestion through the surrounding areas. The Traffic Impact Assessment contained within the EIS demonstrates that the operation of the TWE will alleviate traffic and congestion.	Support
Support – No further detail provided	Support noted	Support
In general I agree with it as long as the Council follows up with sound proofing of all homes also any negative outcome because of the road example parking out the front of my home	Noted. Mitigation Measures in Appendix A (Reference N1) provides for the development and implementation of all reasonable and feasible site-specific mitigation measures to meet noise criteria applicable to the project in consultation with residents. Council are committed to providing the necessary noise abatement measures to mitigate noise impacts as required. On-street parking will be available along the southern side of the proposed road where possible.	Support
It's a great project and well needed!!	Noted.	Support
This Road will be a waste of money, a lot has changed in Albion Park since the 60s and it is growing at an alarming rate, do the By-pass as it is called...A By-pas not another suburban street with traffic lights and 60km limit, It needs to go the other side of Macquarie Rivulet and make it a duel lane Highway.....Also a link road needs to be made at Albion Park Rail on the old part of The Illawarra Hwy connecting to the M1 only a short bit is needed this will take a lot of traffic out of the Township with people getting on the M1 from Albion Park Rail and the Southern part of Dapto. Impact on Flora and Fauna, impact of noise and impact upon Tulkeroo and the Butter Factory.	This submission has been addressed via direct correspondence between Council and the resident. The following provides a summary of the correspondence by Council. The proposed Activity has been developed with consideration of State, Regional and Local planning strategies. Section 2 'Strategic Context' of the EIS outlines the planning strategies, incorporating the Albion Park Town Centre Plan 2014 as the key strategic driver: <i>"The construction of the Tripoli Way Extension located along the northern edge of the town centre offers the potential to significantly relieve traffic levels along the Tongarra Rd shopping strip, enabling opportunities to implement verge and streetscape improvements in the shopping strip."</i> The TWE was conceived as early as the 1960's. The intent remains consistent which is to alleviate traffic congestion through the surrounding	Oppose

Comment / Issue	Response	Oppose or Support / Comment
	areas. The Traffic Impact Assessment contained within the EIS demonstrates that the operation of the TWE will alleviate traffic through the surrounding areas. The road will reduce congestion on the Illawarra Highway and within Albion Park Town Centre. The alignment has been determined by planning and design processes over an extended period of time. The proposed alignment provides a bypass of the primary Albion Park township, allowing those travelling to and from development centres in Calderwood and Tullimbar to directly access the M1. Alternative alignments have been considered and are documented in Section 2.4 'Alternatives Considered' in the EIS. The commentary regarding a bypass north of the Macquarie Rivulet is not relevant to the EIS or to the Activity (construction and operation of the Tripoli Way Extension). The suggestion of having the road north of Macquarie Rivulet was considered but this would impact a high hazard floodway, therefore, moving it north is not feasible, however, Transport for NSW is reviewing options to connect a spine road in the vicinity of Calderwood to Marshall Mount. The State Government is also reviewing options for Dapto access onto the M1. The Traffic Impact Assessment, Appendix U of the EIS, has demonstrated that the Activity will increase the traffic along The Expressway and Tripoli Way, although, it will provide a significant improvement to the overall functionality of the road network in the area and be of substantial benefit to the broader community. The 60km/h speed limit has been determined following consultation with road design experts and is primarily driven by operational safety, since the proposed road traverses an existing residential area and will accommodate pedestrian traffic via the active travel network that is being provided. The Noise Impact Assessment, Appendix T of the EIS, concluded that there are no receivers projected to be highly noise affected by the construction of the TWE. Increase noise will occur via the operation of the TWE, and mitigation measures have been detailed in Section 6.9 'Noise and Vibration' and Section 7 'Summary of Mitigation Measures' of the EIS to outline how the noise impacts will be addressed. This may include on property works and noise walls if appropriate. The Flora and Fauna Assessment, Appendix G of the EIS, found that there are no threatened flora or fauna species within the study area of the EIS. The assessment concluded that the Activity is unlikely to have any significant impact on flora and fauna. Mitigation measures for biodiversity have been detailed in Section 6.2 'Biodiversity' and Section 7 'Summary of	

Comment / Issue	Response	Oppose or Support / Comment
	Mitigation Measures' of the EIS to outline how any impacts will be addressed. The Tulkeroo Homestead and Albion Park Butter Factory (Former) is identified in the EIS heritage assessment. Impacts to the Tulkeroo Homestead will be mitigated through screening and landscaping treatments and noise mitigation measures as included in the EIS. The Butter Factory will be demolished during construction. The design development considered two alignment options that avoided the Butter Factory, however having regard for flood impacts and flood mitigation measures in addition to property acquisition, the preferred option was for demolition of the structure. Mitigation measures in Appendix A are provided for heritage (Reference F1 to F3).	
I feel like it is a good first step, but it doesn't address the HUGE issue of all the traffic at Tongarra Road and Terry Street. That is where all the backup is and anyone who is not going north with get caught up in it. Also, this should be double lanes both ways. We have so many houses about to be built. Lets build this properly.	The Traffic Impact Assessment has demonstrated that the Activity will increase level of service of the Tongarra Road/Terry Street intersection from an F to a C, substantially reducing per vehicle delays through this intersection. Refer to the Traffic Impact Assessment, Appendix U of the EIS.	Comment
Living in Calderwood the log jam coming off the highway is terrible. Along Tongarra and Terry roads are very poorly planned. Tongarra road heading west bound needs to be 2 laned especially with the footpath and car park space. The biggest issue is as soon as it rains and the road floods around the on ramp to the highway and the north side road of Albion Park Public school is flooded people are unable to access routes to work/school etc.	The proposed Activity has been developed with consideration of flooding/hydrology impacts. Section 6.4 'Flooding / Hydrology' assessed the impact of the Activity for 1% and 5% Annual Exceedance Probability (AEP) for flood events. In summary, the assessment concluded the impacts of both flood events are within road reserves and agricultural land. Mitigation measures in Appendix A are provided for flooding / hydrology (Reference F1 to F3). The Traffic Impact Assessment demonstrates that there are currently significant vehicle delays travelling to Calderwood, highlighted by this comment. The proposed road alignment provides a direct route from the M1 to Calderwood and therefore reducing congestion for this vehicle movement. The Illawarra Highway is a Transport for NSW asset and proposed improvements to flooding, or changes to traffic arrangements, on Tongarra Road are outside of the scope of the Activity.	Support
Because traffic through Albion Park is a nightmare. Plus flooding occurrences make travel from anywhere east of Albion Park almost impossible to get to Calderwood.	The Activity has been designed with consideration of flooding/hydrology impacts. Section 6.4 'Flooding / Hydrology' assessed the impact of the Activity for 1% and 5% Annual Exceedance Probability (AEP) for flood events. Impacts to trafficability from the TWE would be positive for the area,	Support

Comment / Issue	Response	Oppose or Support / Comment
	especially during the 1% AEP flood event with reductions in hazard categories. In summary, the assessment concluded the impacts of both flood events are within road reserves and agricultural land. The TWE is immune to the 5% AEP plus a 500mm freeboard, with the freeboard bringing the road above 1%AEP levels in most areas. This means that during a flood event the TWE will be able to provide a direct and flood-free route to Calderwood, which is currently inhibited by flooding on Tongarra Road. Mitigation measures in Appendix A are provided for flooding / hydrology (Reference H1 to H6).	
The traffic in and out of the area is a nightmare, especially with two schools zones to travel through.	Noted. As stated, the TWE will alleviate traffic and congestion through the surrounding areas. School zones in the surrounding street network will remain.	Support
Nothing but good things can come from this, please just build it already	Noted.	Support

5.0 Changes to the Activity

Review of the submissions received has occurred. It is concluded that no amendment to the proposed Activity is required as a result of the submissions received.

However, following consideration of comments from TfNSW minor amendment to mitigation measures in relation to Traffic, Transport and Access are suggested. Updated Mitigation Measures are provided in Appendix B.

6.0 Updated Project Justification and Conclusion

This RTS has considered the submissions received in response to the public exhibition of the EIS. Submissions were received from one (1) public authority and eleven (11) public submissions. Updated Mitigation Measures are proposed, as contained in Appendix B, and relate to ensuring details of constructions accesses from the state road network, including temporary traffic control arrangements to limit the distribution to the Highway, are included.

No design changes to the Activity are required having regard for the submissions received.

The RTS has demonstrated that the proposed Activity will facilitate safe, ongoing, and uninterrupted operation of TWE and will reduce traffic congestion for the current and future road users in the area.

Environmental, economic and community benefits include:

- Improved traffic flow efficiency and cater for future traffic volumes.
- Increased level of reliability in floods, providing a carriageway along the route that is not inundated during a storm event up to and including the 5% Annual Exceedance Probability (AEP) flood event.
- Improved safety for pedestrians and cyclists with the addition of designated pathways.
- Increased level of service at key intersections along the Illawarra Highway.

The material provided in the original EIS and in this RTS Report are submitted to Council to enable formal approval of the Activity.

7.0 Declaration and Approval

The undersigned declare the following.

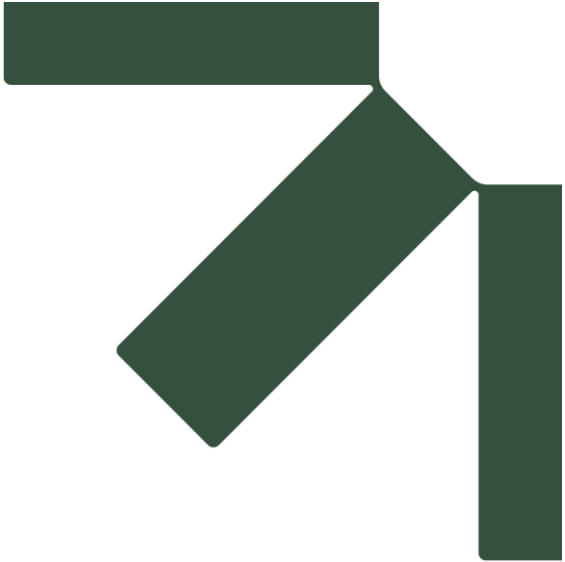
- The EIS dated 23rd May 2024 was prepared in accordance with section 5.5 of the EP&A Act and was prepared in accordance with the *Environmental Planning and Assessment Regulation 2021*.
- The RTS Report has been prepared generally in accordance with the Department of Planning and Environment *State significant development guidelines – preparing a submissions report*, March 2024.
- The EIS and RTS Report do not contain information that is false or misleading.
- The EIS and RTS Report examine and take into account all matters affecting or likely to affect the environment as a result of the activities associated with this project.
- The EIS and RTS Report are true in all material particulars and do not, by their presentation or omission of information, materially mislead.
- The proposed Activity will not be carried out in a declared area of outstanding biodiversity value and is not likely to significantly affect threatened species, populations or ecological communities, or their habitats or impact biodiversity values.
- The EIS considers the effect of the Activity on any wilderness area (within the meaning of the *Wilderness Act 1987*) in the locality in which the Activity is intended to be carried on.
- The proposed Activity is unlikely to present a significant risk of harm to the environment and approval would be in the public interest.
- The proposed Activity may be approved subject to mitigation measures detailed in Appendix B of the RTS Report.

SLR			
Name	Position within SLR	Date	Signature
Rob Dwyer	Technical Director-Environmental Impact Assessment	20-08-24	

Shellharbour City Council			
Name	Position within Shellharbour City Council	Date	Signature

8.0 References

- Department of Planning and Environment (2024), *State significant development guidelines – preparing a submissions report*
- Shellharbour City Council (2014), Albion Park Town Centre Plan
- SLR (2024), Environmental Impact Statement for Tripoli Way Extensions, Albion Park



Appendix A Submissions Register

Response to Submissions Report for Tripoli Way Extension

Albion Park

Shellharbour City Council

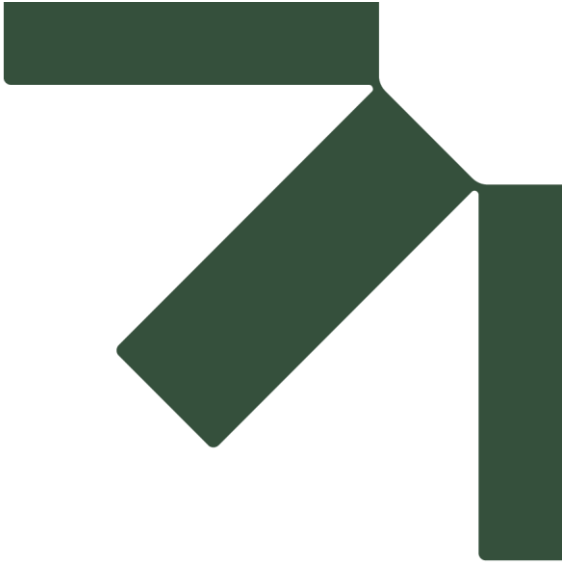
SLR Project No.: 660.030219.00000

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Table A1: Submissions Register

Submission Category	Submission Group / Person	Section where addressed
Agency	Transport for NSW	Section 4.1
Organisations	Lendlease Communities Calderwood Pty Limited (Lendlease)	Section 4.2
Individuals	Emily Greig	Section 4.3
	Arthur Weeding	Section 4.3
	Loraine Quinlan	Section 4.3
	Ryan Franks	Section 4.3
	Glen Evans and Corey Evans	Section 4.3
	Mesha Aroutsidis	Section 4.3
	Dane Parnaby	Section 4.3
	Clinton Down	Section 4.3
	Lindsey Adam	Section 4.3
	Josh Vaughan	Section 4.3





Appendix B Updated Mitigation Measures

Response to Submissions Report for Tripoli Way Extension

Albion Park

Shellharbour City Council

SLR Project No.: 660.030219.00000

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Table B1: Updated Mitigation Measures

Note: **Red text** indicates proposed changes and /or amendments to the Mitigation Measures as provided in the EIS as exhibited.

Environmental Assessment Section	EIS Section No.	Code	Mitigation Measures
General		G 1	A CEMP shall be prepared prior to commencement of construction to ensure that all safeguards and management measures detailed in this EIS are implemented, and that construction impacts on the locality are managed. The CEMP shall include all plans and protocols as stated as required within the EIS.
Air Quality	6.1	AQ1	- An Air Quality Management Plan will be prepared as part of the CEMP to detail the air quality control measures and procedures to be undertaken during construction, including: - Air quality and dust management objectives that are consistent with DPIE guidelines. - Potential sources and impacts of dust, identifying all dust-sensitive receptors. - Mitigation measures to minimise dust impacts on sensitive receptors and the environment. - A dust monitoring program to assess compliance with the identified objectives. - Contingency plans to be implemented in the event of non-compliances and/or complaints about dust.
		AQ2	- Areas of exposed surface are to be minimised throughout the construction site planning and programming, to reduce the area of potential construction dust emission sources. - Control measures, such as stabilisation or covering will be implemented in order to minimise dust from stockpile sites. - Dust suppression measures, such as the use of water carts, will be used in any unsealed road surfaces and other exposed areas. - All trucks will be covered when transporting materials to and from the site. - Activities that generate dust will be avoided or modified during high wind periods. - Work activities will be reviewed if the dust suppression measures are not adequately restricting dust generation. - Rehabilitation of completed sections, where practical, will be progressively undertaken.
		AQ3	- Construction plant and equipment will be maintained in good working condition to limit impacts on air quality. - Where practicable, vehicles will be fitted with pollution reduction devices and switched off when not in use.
Biodiversity	6.2	B1	- Areas of native vegetation outside of the construction footprint will be "No Go-Zones" for people and machinery and will be clearly delineated using temporary fencing. - Within the works extent, temporary tree protection fencing around trees not marked for removal. Tree protection is required around the trunk of each tree greater than 150mm in diameter. Removal of vegetation is to be undertaken following all relevant industry standards. Trees to be removed have been identified. If any other trees are identified as requiring pruning or removal Council staff must inspect and approve their pruning and / or removal prior.



Environmental Assessment Section	EIS Section No.	Code	Mitigation Measures
			- Any biomass cleared within the construction footprint will be removed from the area and disposed of appropriately. - The CEMP for the Activity is to address pollution and contamination issues, such as silt control, and oil/fuel/chemical storage/spill management, which could arise during construction. - No vehicles, machinery, tools, or equipment, fuel, chemicals or waste, gravels, soils or other materials are to be located within the drip zone of any trees. - Erosion and sediment control measures will be established before work begins and maintained in effective working order throughout the duration of the works, and until the study area has been stabilized to prevent off-site transport of eroded sediments. - Landscaping works are to be outside areas of bushland and do not include environmental weeds. - Removal of environmental weeds from the site and their ongoing control.
		B2	- Pre-clearance protocols for fauna shall be included in the CEMP. - Council staff must inspect all vegetation prior to removal for any roosting or nesting native fauna present. If hollows are identified during the preclearance survey, nest boxes are required to be installed to replace potential habitat. - Inspect all vegetation for the presence of fauna species prior to removal. - Rocks, logs, debris that may provide fauna habitat must be retained on-site and disturbance to these features minimised. - Any large machinery must be inspected for trapped fauna prior to cessation of work. - In the event of injury to native fauna, contact a local vet or Wildlife Rescue South Coast on 0418 427 214 immediately.
		B3	The CEMP for the Activity will include erosion and sediment control measures that will be established before work begins and maintained in effective working order throughout the duration of the works, and until the Activity area has been stabilised to prevent off-site transport of eroded sediments.
		B4	- A Part 7 Fisheries Permit under the FM Act must be obtained prior to commencement of reclamation works (bridge abutment, bridge and temporary crossing of Hazelton Creek works) and designs for construction must be consistent with the Policy and Guidelines for fish habitat conservation and management, (DPI Fisheries, 2013). - All construction and maintenance access tracks across the creek will follow the Policy and Guidelines for fish habitat conservation and management, (DPI Fisheries, 2013).
		B5	Plant operators are to ensure minimal disturbance to areas outside of the works site through the establishment of entry points and tracks. No equipment should be operated near or from the waterways.
		B6	Any damage to landscaped or grassed areas must be restored at the completion of the works including replacing native plants and mulch as required.
Contamination	6.3	C1	Remediation of AEC3-6 is to occur in accordance with the Remediation Action Plan (Raw Earth 2024).



Environmental Assessment Section	EIS Section No.	Code	Mitigation Measures
		C2	Once remediation works associated with AEC3-6 have occurred a Site Validation Report is to be prepared to confirm that the site has been effectively remediated.
		C3	A HAZMAT building survey of the dilapidated building in AEC3 will be undertaken.
		C4	Across the Activity area disposal of contaminated fill material will be in accordance with NSW Environmental Protection Authority, Waste Classification Guidelines Part 1: Classifying Waste, 2014.
		C5	The Unexpected Finds Protocol for the discovery of contaminated materials such as underground storage tanks, ACM, odorous and/or stained soil material during excavation activities, as contained within the RAP (Appendix J), will be implemented throughout construction works.
		C6	Should design plans change for the Activity in the future and the potential for significant soil excavation works or dewatering, contamination specialists may need to be engaged to re-attend site and undertake further soil or groundwater samples to ensure all potential contamination impacts to human health and the environment are addressed.
		C7	If excavation earthworks to more than 2 m below the natural ground surface or works by which the water table is likely to be lowered beyond 2 m below the natural ground surface, An Acid Sulphate Soil Management Plan (ASSMP) will be prepared for the excavation of natural soils in the northern portion of the site, based on testing results.
Flooding / Hydrology	6.4	F1	Adequate drainage systems are in place to alleviate runoff capabilities
		F2	Ancillary sites are not to be established in flood prone areas unless an assessment is undertaken by the contractor with an appropriate flood management plan developed or approval by Council.
		F3	Appropriate drainage design be developed and implemented at ancillary sites.
Aboriginal Heritage	6.5	AH1	Prior to construction works commencing an AHIP is to be obtained for all Aboriginal sites identified and registered with AHIMS within the Activity area.
		AH2	If the proposed concept design changes during the course of the project and results in anticipated impacts to TWE_PAD3 and TWE_PAD4, a test excavation program must be undertaken prior to harm.
		AH3	Throughout the duration of the construction works the following procedures must be followed if Aboriginal items are discovered. - Immediately cease all activity at the location. - Ensure no further harm occurs, secure the area. - Notify the Manager Project Delivery, Shellharbour City Council. The Council contact is to advise the Illawarra Local Aboriginal Land Council Aboriginal Sites Officer and the Department of Housing, Planning and Infrastructure (DHPI). - No further action to be undertaken until the required investigations have been completed and any permits or approvals obtained, where required, in accordance with the <i>National Parks and Wildlife Act 1974</i>.
		AH4	If human remains are found during the works, then all works shall cease immediately. The area must be secured within an exclusion



Environmental Assessment Section	EIS Section No.	Code	Mitigation Measures
			zone to prevent unauthorised access and the NSW Police and DHPI must be informed as soon as possible.
		AH5	An appropriate Keeping Place or reburial site must be determined to house the Aboriginal objects. The location of this Keeping Place must be chosen in consultation with the RAPs and Illawarra LALC.
		AH6	If changes are made to the proposed works which result in impact to locations outside of the current study area, further archaeological investigation and survey may be required.
Environmental Heritage	6.6	H1	Prior to construction in the vicinity of the Albion Park Butter Factory (Former) building, a detailed archival recording should be undertaken to document its relationship with Tulkeroo Homestead and the wider setting of the heritage item. Archival recordings should be undertaken in accordance with the NSW Heritage Office documents How to Prepare Archival Records of Heritage Items (Heritage Office 1998) and Photographic Recording of Heritage Items Using Film or Digital Capture (Heritage Office 2006). This should include both photographic and architectural recordings.
		H2	Screening and landscape treatments around Tulkeroo Homestead are to be generally in accordance with the Concept Plans contained in Appendix N and the advice provided in Appendix O. Details of the acoustic screening and landscape treatments will be confirmed following consultation with the landowner.
		H3	Establish an exclusion zone along the boundary between Lots 11 and 12, DP 1205733 to protect and minimise any potential damage to Tulkeroo Homestead which could occur during construction.
		H4	Use discrete fencing to minimise the temporary visual impact of the works on Tulkeroo Homestead and the site setting.
		H5	Monitor the impact of any temporary noise or vibration from construction works so as to mitigate any physical damage that these may cause to Tulkeroo Homestead.
Landscape Character and Visual	6.7	V1	- Work areas near residential dwellings must be fenced and include the use of visual screening (shade cloth or similar). - Lights utilised for night works will be directed away from residential dwellings and roadways to minimise light impacts on surrounding residential areas. - The site must be kept neat and clean of general litter and neat for the duration of works.
		V2	- Vegetation management is to be implemented generally in accordance with Appendix G of the EIS, where practicable and subject to the final detailed design. - A detailed landscaping plan shall be prepared in conjunction with detailed design of the construction works.
Land and Water Use	6.8	L&W1	The CEMP for the Activity shall include Notification Procedures for the informing of the public of construction works and potential for delays.
		L&W2	All works within the riparian corridor are designed in accordance with Controlled Activities - Guidelines for instream works on waterfront land and Controlled Activities - Guidelines for watercourse crossings on waterfront land, to ensure that stabilisation and rehabilitation of all disturbed areas along the creek will restore the integrity of the riparian corridor and will



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			mimic the natural hydraulic, hydrologic, geomorphic and ecological functions of Hazelton Creek.
Noise and Vibration	6.9	N1	Implement best practice construction noise and vibration mitigation measures in accordance with recommendations provided within the NSW Interim Construction Noise Guidelines (DECCW, 1999) (ICNG) and Australian Standard AS2436-1981: Guide to Noise Control on Construction, Maintenance and Demolition Sites. Measures include: • Development and implementation of all reasonable and feasible site-specific mitigation measures to meet noise criteria applicable to the project in consultation with residents. • Use of noise attenuation controls at source, such as mufflers, acoustic screens etc. • Maintaining plant and equipment. • Locating static sources of noise such as generators as remotely as possible from noise sensitive receivers. • Developing proposed hours of operation in consultation with the residents/occupants of the affected receivers and TfNSW. • Allowing construction to occur only during approved construction hours, unless otherwise required as a condition of TfNSW safety requirements. • Informing potentially affected receivers with adequate notice of the construction program and any planned activities that may exceed noise and vibration targets. • Conducting noise monitoring during operations for the purposes of assisting in noise mitigation and to verify the findings of this noise assessment, if complaints are received or proposed activities and number of plants exceed those assumed in this assessment. • Use of temporary noise barriers where practical. • Application of respite periods for noisy activities. • Reduce the number of plants operating at one time where works are required to be carried out outside of standard hours. • Preference should be for electric powered plant over combustion engine powered plant. • Preference should be for hydraulic or electric powered plant over pneumatic powered plant. • Avoid metal to metal contact on equipment to reduce impulsive or scraping noise. • Use of broadband reversing alarms, or “quackers”, on mobile equipment in accordance with the relevant health and safety regulations. • Modification of work activities where noise or vibration is found to cause unacceptable impact. • Should operations be required outside daytime hours, all reasonable and feasible efforts should be undertaken to ensure noise levels would not exceed the INP Noise criteria stated in Section 5.2 and Table 5-1 of the Noise Impact Assessment (Appendix T) by carrying out night-works adjacent to the school rather than nearby residential receivers for example. • Implementing a procedure for dealing with complaints to ensure that all complaints are registered and dealt with appropriately.
		N2	• Avoid scheduling construction activities during non-standard hours of operation where possible. • As part of the CEMP for the site develop a detailed Construction Noise and Vibration Management Plan.



Environmental Assessment Section	EIS Section No.	Code	Mitigation Measures
		N3	- Vibratory rolling should not be carried out within 10 m of nearby receivers during Standard Construction Hours. - Vibratory rolling should not be carried out at night to avoid sleep disturbance.
		N4	- Vibratory rolling should not be carried out within 10 m of residential dwellings. - The Construction Vibration Management Plan within the CEMP shall determine management methodology and monitoring procedures.
		N5	- Consideration of quieter pavement surfaces. - Consideration of noise barriers, including noise mounds and noise walls. - Assessment of suitability of at property treatments (mechanical ventilation, upgraded glazing etc.). - An operational Noise and Vibration Management Plan should be prepared for the project, to include, but not be limited to, the above measures. - The results of Noise Impact Assessment and recommendations for mitigation are based on the assumption the Broughton Avenue intersection will be upgraded by others prior to 2041. Should this not occur, Council will need to reassess the traffic and transport impacts in the vicinity of the project and ensure all appropriate mitigation measures are applied.
		N6	Site Controls: - Due to the proximity of residents to the project, temporary barriers (i.e. 2m high solid screens) may be a feasible treatment option to mitigate noise from activities such as services relocations or other activities that may occur during the night period. - Site offices, carparks, and hard stand areas should ideally be located at the western extent of the project, on the northern side of the alignment in order to maximise separation distance to as many residents as possible. Manage hours of operation: - Carrying out works within daytime hours as follows (arrivals and departures to site may occur either side of these times): 7:00am to 6:00pm Monday to Friday 8:00am to 1:00pm Saturdays - No work on Sunday and public holidays. - Do not carry out operations during evening or night-time hours, unless necessary and subject to approval by Council. - Management and Behaviour Controls: - Ensure that managers effectively communicate acceptable and unacceptable work practices for the site, through staff site inductions, notice boards, and prestart meetings. - Avoid the need for reversing in the new area by creating a loop road or similar. - Avoid dropping materials from height. - Workers should avoid shouting, minimise talking loudly, and avoid slamming vehicle doors.
Soil and Water	6.10	S1	A Soil and Water Management Plan (SWMP) will be prepared and implemented as part of the CEMP. The SWMP will identify all reasonably foreseeable risks relating to soil erosion and water



Environmental Assessment Section	EIS Section No.	Code	Mitigation Measures
			pollution and describe how these risks will be addressed during construction.
		S2	Any future works involving soil disturbance should incorporate an unexpected finds protocol to facilitate the identification and management of previously undocumented contamination
		S3	Soil disturbance is to occur only within the construction footprint. Minimise disturbance wherever possible.
		S4	Cut vegetation to be removed to allow the roots to remain and stabilize soil on slopes. Use jute matting or similar to stabilize banks and prevent erosion.
		S5	- Adequate sediment controls are required to prevent disturbed sediment from entering the nearby waterways and stormwater outlets during heavy rainfall. - All necessary sediment and erosion control measures are to be installed prior to works commencing and maintained throughout the life of the project. - No activities (including drilling and/or excavation) are to be undertaken immediately after heavy rainfall events or if it is likely for rain to occur. Unless it is certain that no sediment would be discharged from site.
		S6	Any imported fill must be from a known source, free of contaminants and compatible with the local soil types. If any potential contamination or suspect material is encountered cease works immediately and contact Council's environment team.
		S7	- Where required, supplementary testing must be undertaken to confirm that the risk of acid sulphate soils has been adequately assessed. This applies particularly to areas of deep cut and at the locations of foundations and piling. - In locations where excavations will exceed 2 m in depth from natural ground level it is recommended that a management plan be prepared prior to the commencement of earthworks and construction. The management plan should be prepared in consideration of the ASSMAC Guidelines (ASSMAC 1998) and should be included as a sub-plan of the broader project Construction. - The management plan must include the following: - Review and interpretation of field testing and analytical results from previous investigations, and in doing so identify areas of the site that may contain ASS / acidic soils - Describe the construction works and identify those works that may result in the disturbance of ASS / acidic soils - Detail the mitigation measures and actions that would be required to mitigate potential risks associated with disturbance of ASS / acidic soils. This includes but is not limited to excavated soils, excavation surfaces, soil treatment performance criteria, validation testing, stockpiling durations, soil treatment areas, prescribed liming rates, groundwater and surface water management and contingencies (e.g. weather events, over-liming and offsite disposal of soil) - Monitoring oversight and reporting requirements including environmental monitoring programs (surface water and stockpile), inspection and oversight and provision of suitable reporting and deliverables. The ASSMP (or equivalent) must adhere to Part 6.1 of the Shellharbour LEP and any other relevant local, state or national government planning and regulatory instrument. Additional testing may be required



Environmental Assessment Section	EIS Section No.	Code	Mitigation Measures
			prior to or during construction to confirm the neutralising capacity of soil.
		S8	- Any incidental groundwater discharge that may occur during construction will need to be captured, tested and if necessary treated before disposal to the surrounding environment - If groundwater discharge is expected to exceed 3ML per year an aquifer interference licence will be required under the Water Management Act - Measures will need to be put in place to ensure no ongoing groundwater discharge occurs after completion of construction.
Traffic, Transport and Access	6.11	T1	The performance of the Illawarra Highway/Broughton Ave/Tripoli Way intersection in the 2041 year should be investigated further as part of broader traffic network management arrangements potentially involving Council, TfNSW and others (such as local property developers subject to Voluntary Planning Agreements).
		T2	- A Traffic Management Plan (TMP) will be prepared by a suitably qualified consultant and implemented as part of the CEMP. The TMP will be prepared in accordance with the RMS Traffic Control at Work Sites Manual and the worksite manual RMS Specification G10. The TMP must restrict vehicle movements and parking to approved project areas, and manage speed limits near the work. Details will include all impacts of construction access points including construction access from the state road network, and including temporary traffic control arrangements to limit the disturbance to the Highway.
		T3	- Road closures are to be limited during peak traffic periods to ensure impacts to traffic flows are minimal. - Suitable traffic control measures are to be in place during the movement of equipment and machinery in order to ensure the safety of pedestrians and other road users.
		T4	- Impacted residents must be contacted prior to any works commencing. Accessibility and movements must be allowed for the residents that will be directly impacted as part of the TMP. Where practicable, works are not to block access along footpaths.
		T5	Signalised pedestrian crossings will be provided at the TWE / Calderwood Road intersection, TWE / Hamilton Road intersection and TWE / Terry Street intersection within the Study Area as part of the detailed design process for the project.
Waste Management	6.12	WM1	- The Waste Management Plan from the EIS will be implemented as part of the CEMP. The Plan will outline: - Compliance with the resource management hierarchy principles. - Measures and controls to monitor and minimise waste generation. - Lawful handling and disposal of unavoidable waste. - The plan will be prepared in accordance with the RMS Environmental Procedure - Management of Wastes on Roads and Maritime Services Land (2014), the NSW Waste Classification Guidelines (2014) and relevant RMS Waste Fact Sheets. - Unsuitable fill material and all other waste streams must be classified in accordance with the NSW EPA Waste Classification Guidelines (2014) and disposed of at an appropriately licensed facility.

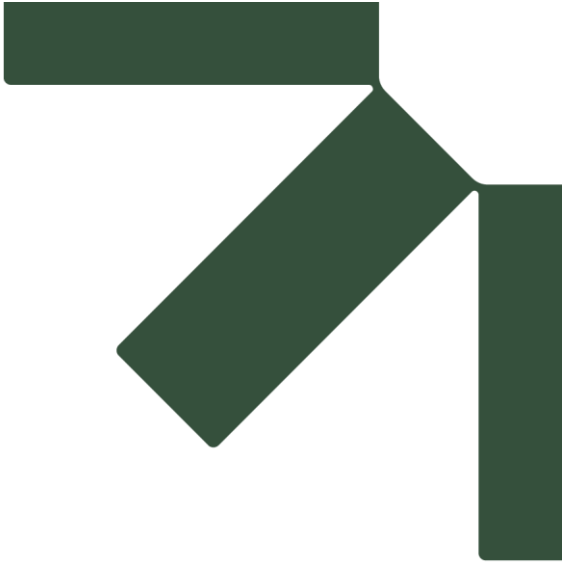


Environmental Assessment Section	EIS Section No.	Code	Mitigation Measures
			Any excess excavated soil, spoil, green waste or general waste will be loaded into trucks and disposed of at Dunmore Recycling and Waste Disposal Depot.
		WM2	- General waste and recycling bins will be provided at the site ancillary sites and throughout project areas for the duration of construction - Ancillary sites and work areas will be maintained, kept free of rubbish and cleaned up at the end of each working day - Important to prevent material to enter the nearby waterways and stormwater outlets.
		WM3	- Any uncontrolled spills of waste oils, fuels and other materials will be contained using a spill kit and managed by an environmental professional. All waste generated as a result of uncontrolled spills and maintenance will be managed in accordance with the protocol in Safeguard WM1. - Spills and uncontrolled releases of fluids and dangerous goods must be managed in accordance with a procedure specified in the CEMP and government regulators (i.e. NSW EPA) notified as required.
Airport Environment	6.13	A1	Substantial (building-like) structures should not exceed 13m in height in the assessment trigger area to avoid further assessment.
		A2	- Shellharbour Airport to review and comment on the plant species list specified in the Landscape Plans. - Stormwater management should ensure that any basins incorporated into the design are emptied as soon as practicable.
		A3	Zone C and D (identified in Appendix W) lighting restrictions should be taken into account in the final lighting design, to accommodate for potential future lighting of Runway 08/26.
		A4	Any impact on the PANS-OPS procedures will need to be confirmed by Airservices Australia at the request of the airport operator.
		A5	Construction sequencing and methodology should be considered in relation to the OLS and PANS-OPS surfaces. The most restrictive limit over the site is the OLS inner horizontal at 52m AHD. All intrusions above 52 m AHD, including equipment during construction such as cranes, must be reviewed and assessed by the airport operator in consultation with the relevant aviation authorities.
Climate Change and Hazards	6.14	CCH 1	The use of alternative fuels and power sources for construction plant and equipment will be investigated and implemented, where appropriate.
		CCH 2	Recycled materials will be incorporated where possible.
		CCH 3	Appropriate spill kits, advocated for use in association with fuels and chemicals are to be maintained on-site. These are to include spill booms and other methods aimed at the containment of fuels and chemicals spilled within the aquatic environment.
		CCH 4	Fuels and chemicals are to be stored off-site, however, if required to be stored on-site, they are to be located in a bunded area away from drainage lines
		CCH 5	No refuelling is recommended within the subject site. If however, refuelling is required at the subject site, refuelling sites are to be located in a safe location, and be established where native



Environmental Assessment Section	EIS Section No.	Code	Mitigation Measures
			vegetation has previously been cleared and at least 30 m from a waterway.
		CCH 6	Forecast checks of the Bureau of Meteorology site shall be undertaken daily. In the event that heavy rain is predicted, arrangements are to be made immediately to remove any plant and equipment from within the banks of the waterway prior to the rain event. All plant and equipment would be removed to higher ground above the 1 in 100 year flood level.
		CCH 7	Any debris and spoil accumulated within the works site as a result of flooding would be removed to the designated stockpile area.
		CCH 8	All environmental controls would be reinstated as soon as possible following flooding.





Appendix C Submissions

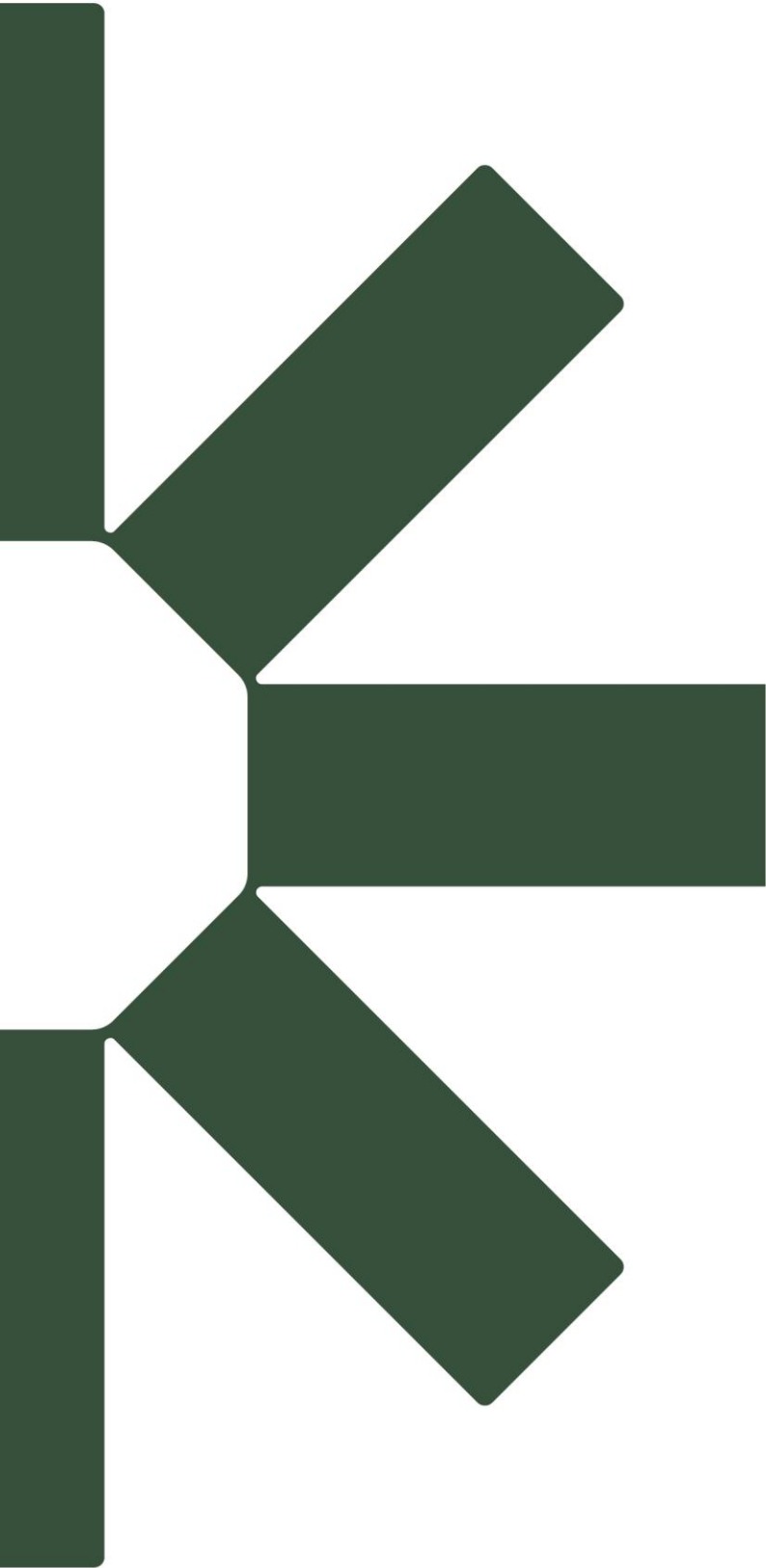
Response to Submissions Report for Tripoli Way Extension

Albion Park

Shellharbour City Council

SLR Project No.: 660.030219.00000

20 August 2024



Making Sustainability Happen