

13 June 2012

Mr Alan Bright
A/Director, Metropolitan & Regional Projects South
Department of Planning & Infrastructure
GPO Box 39,
Sydney NSW 2001

Addendum to the Preferred Project Report for a mixed use development of the former Allied Mills site, 2-32 Smith Street, Summer Hill (MP10_0155)

Att: Amy Watson

Dear Mr Bright,

Thank you for your correspondence of 21 June 2012 requesting comment on the addendum to the Preferred Project Report for the above address. Sydney Water has reviewed the proposal and provides the following comments for the Department's consideration.

Stormwater

Sydney Water has reviewed the flooding mitigation strategies put forward by the proponent, and note the extensive prior communications that have taken place.

Sydney Water objects to the current proposal on the basis that the proponents' strategy of dependence on non structural flood response measures only are insufficient to manage the flooding issues associated with the site, as detailed in Attachment 1.

The current flood modification proposal must be tested in an appropriate flood modelling exercise to ensure potential adverse impacts and risks are sufficiently mitigated, and must include structural flood response mechanisms as suggested in Attachment 1.

Sydney Water does not support the proposal until such time as the flood related issues have been resolved.

Sydney Water Servicing

Sydney Water will further assess the impact of any subsequent development when the developer applies for a Section 73 Certificate. This assessment will enable Sydney Water to specify any works required as a result of future development and to assess if amplification and/or changes to the system are applicable. The developer must fund any adjustments needed to Sydney Water infrastructure as a result of the development.

The developer should engage a Water Servicing Coordinator to get a Section 73 Certificate and manage the servicing aspects of the development. The Water Servicing Coordinator will ensure submitted infrastructure designs are sized and configured according to the Water Supply Code of Australia (Sydney Water Edition WSA 03-2002) and the Sewerage Code of Australia (Sydney Water Edition WSA 02-2002).

Sydney Water requests the Council to continue to instruct proponents to obtain a Section 73 Certificate from Sydney Water. Details are available from any Sydney Water Customer Centre on 13 20 92 or Sydney Water's website at www.sydneywater.com.au.

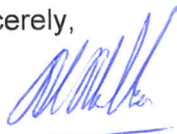
Sydney Water e-planning

Sydney Water has created a new email address for planning authorities to use to submit statutory or strategic planning documents for review. This email address is urbangrowth@sydneywater.com.au. The use of this email will help Sydney Water provide advice on planning projects faster, in line with current planning reforms. It will also reduce the amount of printed material being produced. This email should be used for:

- Section 62 consultations under the Environmental Planning and Assessment Act 1979
- consultations where Sydney Water is an adjoining land owner to a proposed development
- consultations and referrals required under any Environmental Planning Instrument
- draft LEPs, SEPPs or other planning controls, such as DCPs
- any proposed development or rezoning that will be impacted by the operation of a Sydney Water Wastewater Treatment Plant
- any proposed planning reforms or other general planning or development inquiries

If you require any further information, please contact Ainsley Rotgans of the Urban Growth Branch on 02 8849 4004 or e-mail ainsley.rotgans@sydneywater.com.au.

Yours sincerely,



Adrian Miller,
Manager, Growth Strategy

ATTACHMENT 1

The Allied Mills site, the proposed railway station and other proposed urban renewal sites to the east of the railway line are affected by hazardous local flooding from time to time. It is crucial that the planning process deliver an appropriate response to the flooding issue.

Flood responses may be either Structural or Non Structural. The Allied Mills proponents have until recently promoted the implementation of Non Structural management options for their development site.

Sydney Water has indicated its view that a Non Structural response alone is not considered sufficient and that Sydney Water would anticipate a strong community response following significant future flood events.

Sydney Water has also put forward the view that an appropriate flood model should be developed to form a basis to test a range of feasible Structural flood mitigation measures and to meaningfully inform the authority making a determination of the proposed development. Over a considerable consultation period, the Allied Mills proponents have insisted that the implementation of Non Structural responses is sufficient for their development to proceed, a view not shared by Sydney Water, and have resisted Sydney Water's requests for model refinements and investigation of Structural flood mitigation measures.

In the latest round of submissions to the Department of Planning and Infrastructure, the proponents have now indicated their preference for a wall to be installed along their boundary 'to prevent overtopping of water from within the light rail corridor'. This structural flood modification proposal, along with other potential structural options raised by Sydney Water to date, need to be tested in an appropriate flood modelling exercise to ensure no unacceptable adverse impacts are caused to others.

Sydney Water is not against the re development of the Allied Mills site and such a position should not be inferred by others. However, Sydney Water does object to the proposed development of the severely flood affected portions of the Allied Mills site where the existing flood hazard is to be managed by Non Structural flood response measures only.

Attached are two Structural flood mitigation options that Sydney Water would expect to likely manage flooding sufficiently to facilitate the local urban renewal ambitions of the Department of Planning and Infrastructure. However, these and any other feasible options that may be put forward, must be tested prior to finalising the selection of the most appropriate local flood responses. This is an intrinsic part of the planning process and should be completed before permitting major land use intensification in the local floodplain.

