

9 November 2016

WM Project Number: 16178 Our Ref: ST 091117 BCELTR Email: simon.twiggs@frasersproperty.com.au

Simon Twiggs Frasers Property Ground Floor Ground Floor, 1C Homebush Bay Drive, RHODES, NSW, 2138

Dear Sir

#### Re: Edmondson Park - Section 75W Request to Modify the Edmondson Park South Concept Plan (MP\_10-0188) Noise and Vibration Issues

We note the comments from the NSW EPA in the letter to the Department of Planning and Environment (DOC 16/424685-02:PW) relating to noise and vibration associated with rail and road operations with respect to the above 75W application. The section titled "Road and Rail Traffic Noise" refers to the requirements of the Infrastructure SEPP 2007 and the fact that the application does not appear to include consideration of any potential road and rail traffic noise impacts.

However, we note that the site has been previously conditioned to require the above issues to be addressed in accordance with the requirements of the Infrastructure SEPP 2007. Accordingly, future development will be assessed to address these issues, at DA stage, and will be accompanied by an Acoustic report to address the issues raised by the EPA.

### Yours faithfully WILKINSON MURRAY

Brian Clarke - Senior Associate

Wilkinson Murray Pty Limited · ABN 39 139 833 060

Level 4, 272 Pacific Highway, Crows Nest NSW 2065, Australia • Offices in Orange, Qld & Hong Kong

t +61 2 9437 4611 • f +61 2 9437 4393 • e acoustics@wilkinsonmurray.com.au • w www.wilkinsonmurray.com.au

# ACOUSTICS AND AIR



Our Ref: 110223 – Response to s75W submission 161116

PK:pk

16 November 2016

Frasers Property Australia PO Box 3307 Rhodes NSW 2138

## Attn: Simon Twiggs

Subject: Response to Submission – Section 75W Modification 4 to 10\_0118 Edmondson Park South

Dear Simon,

I refer to the subject Section 75W modification application for the Edmondson Park South, and the recent submission from the Environmental Protection Authority (EPA) regarding the proposed water quality strategies for the development.

In particular, the EPA has raised concerns that the strategies have been based upon generic per cent load reductions that have no reference that support the contemporary NSW Water Quality Objectives.

The Water Sensitive Urban Design Strategy 2007 for the Edmondson Park precinct was commissioned by the Growth Centres Commission and prepared in consultation with Liverpool City Council. The strategy was based upon the water quality objectives and load reduction criteria from Liverpool City Council, the Department of Environment and Climate Change, the Georges River Stormwater Management Plan, and the Department of Water and Energy.

This Strategy then informed the 2010 Water Cycle Management Plan prepared for Landcom to support the Part 3A Concept Plan for lands within the Edmondson Park Precinct of the South West Growth Centre. The plan specifically responded to the Director General's Requirements (DGR's) in relation to water quality and stormwater flow management that were identified by the various agencies (including the EPA) consulted by the Department of Planning during the course of the Part 3A application. In responding to these requirements, the Management Plan adopted load reduction criteria from the Department of Environment and Climate Change & Water and the Georges River Stormwater Management Plan and developed a water quality control system based upon these criteria. This system was supported and approved by the Minister of Planning. The Section 94 contributions plan for the precinct were based upon this adopted strategy.



PO Box 4366 PENRITH WESTFIELD, NSW 2750 P 02 4720 3300 W www.jwprince.com.au E jwp@jwprince.com.au

ISO 9001:2008 – Quality AS/NZS 4801:2001 - Safety ISO 14001:2004 - Environment

# J. Wyndham Prince

Consulting Civil Infrastructure Engineers & Project Managers

Based on the comments from the EPA, it appears that a new assessment approach that requires the identification of alternate baseline water quality targets to those adopted and approved at the precinct rezoning stage (and indeed those adopted in the Georges River Catchment Management Plan) is being recommended. It is considered unreasonable to require a different, and what may be a significantly higher, level of water quality control be provided in response to the S75W modification application, particularly when the modification has no additional impact upon the water quality leaving the site.

Accordingly, we consider that the proposed water quality strategies for the development of the Edmondson Park South precinct are based upon the appropriate criteria.

Should you have any queries regarding this matter, please do not hesitate to contact me.

Yours faithfully,

# J. WYNDHAM PRINCE

PAUL KOEN Project Manager