

**Managing Director**

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**Modification Assessments  
Department of Planning and Environment  
320 Pitt Street,  
SYDNEY 2000**

Your Ref: N/A  
Our Ref: 17037 Letter 006  
Date: 17<sup>th</sup> July 2019

Attn: Ms Casey Joshua

**Re: Modification to Calderwood Concept Plan - Major Project 09\_0082 MOD 4  
- Public Submission in Response to RTS Documents on Public Exhibition**

Rienco has been asked by Ms Joanna Knight, owner of 23 Calderwood Road Albion Park, to make a further submission in response to the RTS documentation currently on public exhibition in relation to Modification 4 to the Calderwood Concept Plan.

Rienco previously submitted a letter dated 8<sup>th</sup> October 2018 on behalf of Ms Knight expressing concern that flood level increase impacts in the PMF event at No 23 Calderwood Rd (and many other nearby residential properties) had been significantly increased from what has been previously indicated in both the Approved Concept Plan and at the 2012-13 court case. We reproduced an extract from Figure 11 of the July 2018 Wyndham Prince report which we maintained showed increased flood levels in PMF event along Tripoli Way in comparison to not only the modelling done for the 2012-2013 court case but also those indicated in the Consolidated Concept Plan Appendix O Floodplain Risk Management Study.

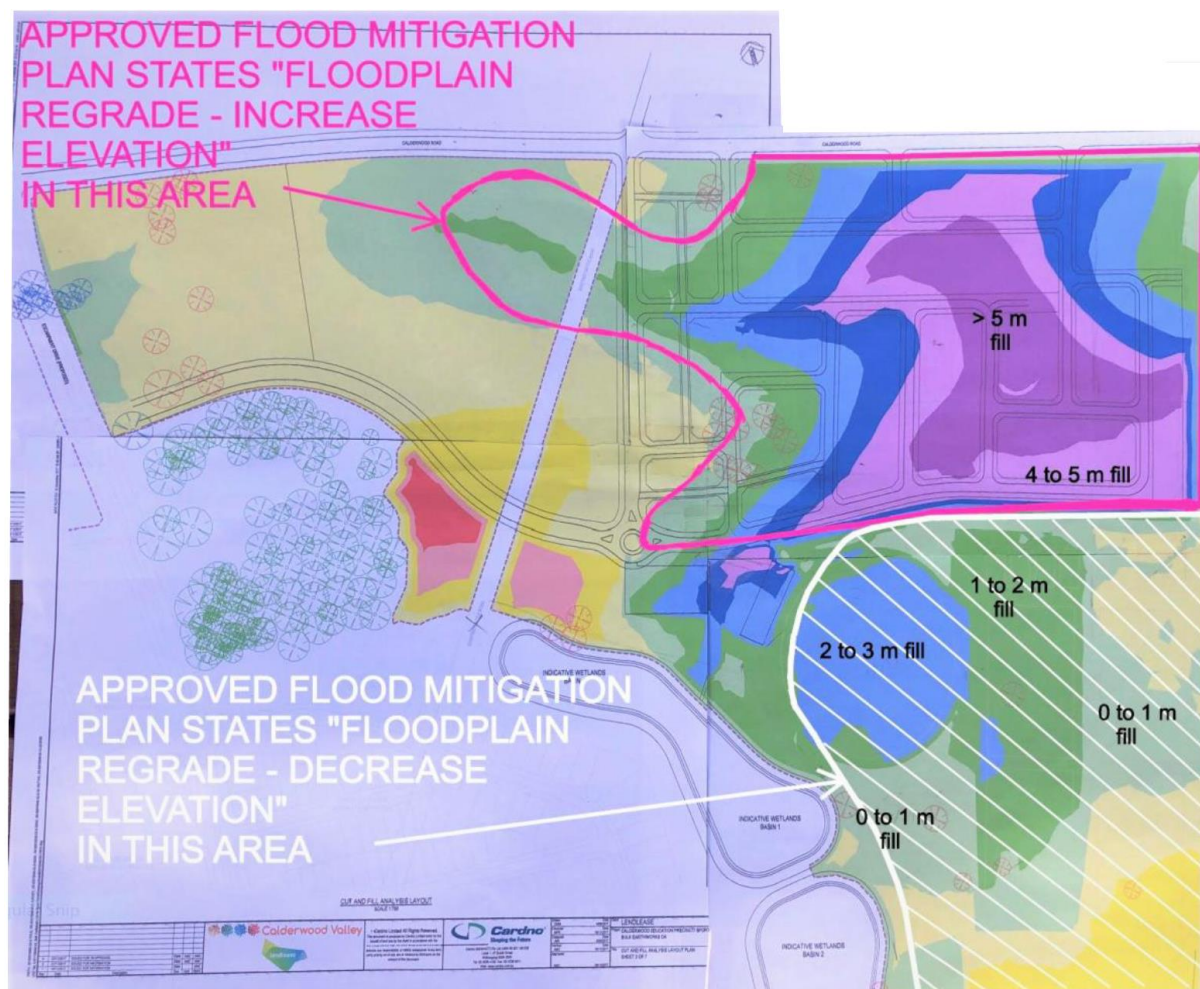
In the RTS documentation an updated Wyndham Prince report is included at Appendix F titled 'Updated Water Cycle Management - Post Exhibition Report'. This Post Exhibition Report (at Attachment A to Appendix F, p19) responded to the matters raised in Rienco's October 2018 letter.

Wyndham Prince advised that the orange colour coding in their Figure 11 represents flood impacts 'up to (but not greater than) the specific depth shown', and on this basis concludes PMF flood depths in Figure 11 are up to 0.1m lower than the Approved Concept Plan

We have difficulty accepting Wyndham Prince's explanation as to how the legend of Figure 11 should be interpreted. It does not make sense for the orange colour coding in Figure 11 to be representative of flood impacts 'up to (but not greater than) the specific depth shown'. That would make the lightest of the five orange zones ('up to 0.02m') non-existent as it would be subsumed into the light grey zone ('between -0.02m and 0.02m'), yet Figure 11 shows the light grey and lightest colour of orange as two distinct zones. Also, in their other figures (such as Figure 8.09 in the Post Exhibition Report) each blue colour represents a range (eg, 1.0 to 2.0m, 2.0 to 3.0m) with the most intense colour shading described as '3.0+' indicating that flood depths are equal to greater than 3.0m. Wyndham Prince maintains however in Figure 11 that '0.4+' means the opposite to Figure 8.09, in that flood impacts are not more than 0.4m. This simply doesn't make sense.

The Wyndham Prince Post Exhibition Report also lacks clarity in response to queries raised on bulk earthworks scenarios used in their flood modelling. They say, *'the cut and fill plan carried out by J. Wyndham Prince is generally consistent with the bulk earthworks plans submitted to SHCC in support of DA0586-2018 which is currently under assessment'*. They purport to offer objective evidence regarding this by stating, *'Nevertheless, a revised cut and fill plan is present in figure 8.10 the Post Exhibition WCFM report which includes locations and depths of the proposed cut and fill'*. Figure 8.10 however doesn't show any cut/fill at the sports ovals.

This issue is however further addressed, in part, through the statement that *'Minor changes on the cut/fill including south of Macquarie Rivulet adjacent to stage 1 have been implemented to facilitate an improved flow management in the corridor which is consistent with the original approval.'* There is no objective evidence however to support the statement that the earthworks changes are minor. As per the sketch below showing the bulk earthworks drawings submitted in support of DA0586-2017 compared with the Flood Mitigation Plan in Appendix C11 of the CCP, the changes to proposed earthworks cannot be described as minor.



**Sketch showing DA0586-2017 Bulk Earthworks Drawings\* compared with the Flood Mitigation Plan in CCP Appendix C11**

*\*sourced from Cardno DA drawings 82015040-53 C1012, C1013 & C1014, as publicly exhibited in April 2018.*

Wyndham Prince does acknowledge that impacts in the PMF event have increased in comparison to the PMF Impacts for the Stage 1 Project with the lengthened bridge over Macquarie Rivulet (which eliminated the downstream impacts that concerned Drew Bewsher near parts of Tripoli Way and Taylor Road). They have not however commented on Drew Bewsher's advice to minimise flood level increases in the PMF for urban areas downstream of the project along the fringes of Albion Park township. Clearly the PMF impacts on urban areas downstream haven't been minimised as they are now more than what was committed to at the Stage 1 Project Approval.

It is suggested that:

1. A corrective version of Figure 8.10 be prepared reflecting the bulk earthworks scheme described on the plans submitted in support of DA0586-2017.
2. A further plan be prepared showing the differences between the corrective version of Figure 8.10 and the approved cut and fill areas on Flood Mitigation Plan at Appendix C11 of the Consolidated Concept Plan.
3. Once the differences are identified it is suggested that either Figure 8.10 be further amended to be consistent with Consolidated Concept Plan Figure C11, or alternatively additional information be submitted by the Applicant justifying the departures from the cut and fill arrangement shown on Consolidated Concept Plan Figure C11. Such justification should include comparative cut/fill volumes, differences in the comparative quantities of topsoil v material suitable for re-use as structural fill generated from the changes, the need for any additional imported fill and the proposed way of dealing with the disposal of any additional quantities of topsoil either on-site or off-site.
4. The flood model is re-run to reflect any changes made in regards to (1), (2) and (3) above, and an updated version of Figure 11 in the Wyndham Prince July 2018 report is prepared with a legend that stipulates the range of depths associated with each colour shading rather than a single value for which it is unclear whether it represents the upper or lower end of the range.
5. Any flood level increase impacts in the PMF event in comparison to the impacts on urban areas agreed for the Stage 1 Project Approval referred to Mr Bewsher for comment on their acceptability.

For and on behalf of  
Rienco Pty Ltd



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cc: Ms Joanna Knight