

30 April 2012

Mr Alan Bright
A/Director – Metropolitan & Regional Projects South
GPO Box 39,
Sydney NSW 2001

MP10_0155 Preferred Project Report for mixed use development at 2-32 Smith Street, Summer Hills

Att: Amy Watson

Dear Mr Bright,

Thank you for your letter of 30 March 2012 requesting comment on the Preferred Project Report for development at the above address. Sydney Water has reviewed the report and provides the following comments for the Department's consideration.

Stormwater

Sydney Water's Stormwater Group has been in extended discussion and negotiation with the development proponent for this site in regards to stormwater and flooding issues – please see enclosed copy of correspondence.

Upon review of the Preferred Project Report, and in light of previous advice provided to the proponent, Sydney Water's concerns remain that the flood related matters have not been sufficiently addressed. Sydney Water does not support the current development proposal or Preferred Project Report until such time as the flooding 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 Department 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:

Sydney Water Corporation ABN 49 776 225 038

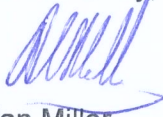
1 Smith St Parramatta 2150 | PO Box 399 Parramatta 2124 | DX 14 Sydney | T 13 20 92 | www.sydneywater.com.au

Delivering essential and sustainable water services for the benefit of the community

- 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 Ray Parsell of the Stormwater Group on 02 8849 4182 or e-mail raymond.parsell@sydneywater.com.au

Yours sincerely,



Adrian Miller,
Manager, Growth Strategy



12th March 2012

SJB Planning
L2/490 Crown Street
Surry Hills NSW 2010

Reference: Mr Scott Barwick

Mixed Use development of the former Allied Mills site

Dear Scott

I refer to your letter dated 22nd February 2012 regarding the proposed mixed use development of the former Allied Mills site at Summer Hill.

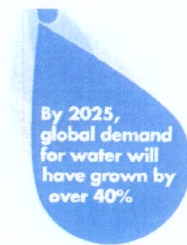
Sydney Water owns the existing Hawthorn Canal stormwater asset that passes through the proposed light rail station and the adjacent Allied Mills site. The capacity of the enclosed culverts under the existing railway line and also under Longport Street is limited such that severe local flooding is expected to occur from time to time.

As you would be aware Sydney Water has engaged WMA Water Pty Ltd to develop a Tuflow 2D flood model of the Hawthorn Canal catchment and that preliminary results show extensive flooding potential not only in the railway corridor but also within the adjacent sites, including yours, proposed for major urban renewal projects.

To date you and your flood management consultants have resisted Sydney Water's requests to develop a more robust and meaningful local flood model that could then be used as a sound basis to investigate and test broader flood modification options.

Sydney Water agrees with your stated view that the proposed re development of the Allied Mills site in isolation is unlikely to be able to rectify this situation. However, it is reasonably foreseeable that elements of the current master planning layout (in particular the broad footprint of Building 1A) could compromise future flood mitigation works.

Sydney Water has expressed its concern with regard to the intensification of development in the floodplain without appropriate provisions for management of the local flood risk. Particular attention has been directed to the 'break out' of flood flows overland across the existing railway line and into the Allied Mills site. Sydney Water is especially concerned with the potential risk for people to be swept into the open



channel as these overland flows pass over the main access promenade to the railway station and re-enter the open channel.

Sydney Water has from an early point in the consultation process attempted to encourage the Allied Mills development proponents to work collaboratively with adjacent property owners (in particular Transport for NSW) to address the local flooding issues. Resolution of the flooding issues would likely involve a degree of cooperation between affected land owners.

This approach is reinforced by the Director General's Requirement MP 10_0155 and MP 10_0180 No 11:

- *The flood assessment and drainage design should consider the development of the site, in addition to any cumulative impacts of the light rail station located in the floodplain and the development yield of the McGill Street Precinct Masterplan and the Concept Plan application for 78-90 Old Canterbury Road, Lewisham (MP 08_0195).*

At present major flooding would occur in an uncontrolled manner in areas proposed for high intensity land use, on your site as well as in the railway corridor. As discussed there may be a variety of flood response / management measures. Sydney Water would prefer that hazardous flood flows be separated from high intensity land use areas and conveyed in a 'controlled manner' around these areas.

Otherwise, post development future flood incidents could not only be foreseeably life threatening, but would also likely damage Sydney Waters standing in the community and develop considerable public pressure for Sydney Water to 'fix things' retrospectively.

At the joint meeting on the 20th February 2012 between you, Sydney Water and Transport for NSW, Mr Jeremy Kidd of Transport NSW advised that their stormwater management consultant team would be investigating local flood issues as part of the design program for the rail corridor.

We jointly and tentatively discussed some options that could be evaluated and considered further by their consultant. Please find enclosed two sketch mark ups, Option 1 and Option 2 that have subsequently been referred to Transport for NSW for review.

In terms of establishing a 'Statement of Commitment' there needs to be some caution in understanding the role of Sydney Water in this matter. Sydney Water is not the planning consent authority and the proposed statement seems to suggest that there would be a kind of conditional approval of the site master plan by Sydney Water.



The seriousness of the flooding issues presented on the former Allied Mills site should not be underestimated. A Statement of Commitment should not be devised to defer a broader investigation of local flooding issues and identification of the most appropriate flood response strategy, potentially including selected flood mitigation works.

If you have any further queries in this matter please contact Mr Ray Parsell on 8849-4182.

Yours sincerely

Ray Parsell
Senior Stormwater Asset Planner

