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Your Ref: MP06_0181 MOD 1

Contact: Carina Gregory on 9725 0703

26 November 2007

Department of Planning
Strategic Sites and Urban Renewal
GPO Box 39
SYDNEY NSW 2001



Attention: Ms Liz Boggie

Dear Ms Boggie

GREYSTANES SOUTHERN EMPLOYMENT LANDS - MODIFICATION (MP 06_0181 MOD 1)

Thank you for the opportunity to provide comment on a proposed modification to the Minister's approval of the major project application for the Greystanes Southern Employment Lands (SEL).

Fairfield City Council has reviewed the modification and would like to provide the following comments:

1. Subdivision Design and North-South Spine Road

Council notes that the southern-most section of the proposed spine road (Reconciliation Drive), which will ultimately connect into in Fairfield's road network, will be dedicated at Stage 6 of the development upon completion of the business park and service retail area.

While Council is supportive of the construction of this section of the road in the later stages of the development, it does not support the opening of this road to the south until such time as the completion of the road linking Victoria Street, Wetherill Park to Reconciliation Drive. Council's ongoing position is that the Prospect Arterial Corridor which has been reserved for this road link should be used, and Council has raised this matter directly with the Minister for Roads and the Roads and Traffic Authority (RTA).

As you may be aware, there have also been discussions between Boral, its representatives and Council regarding the construction of a southern road connection from Widemere East to Davis Road, Wetherill Park. The Minister's approval requires Boral to construct this four lane at-grade road up to a value of \$5.5 million to a design agreed by Boral and this Council. As this road is expected to be heavily trafficked, it will need to be designed and built to the necessary standards to ensure the safety of motorists and pedestrians that will use it. Building the road at grade to function as a causeway during heavy rainfall is not considered to be a satisfactory alternative given

the high flood risks which occur in this location.

It therefore remains Council's position that the road connecting the SEL to Davis Road should be built to the same flood standard, capacity and levels as the transit way, providing access above the 100-year flood and ensuring there is no encroachment on the transit way opening across Prospect Creek.

2. Redesign of stormwater and groundwater management systems

The following comments are made on the revised stormwater management strategy for the SEL. Comments have not been provided on the groundwater management system as Council did not comment on this issue previously.

Stormwater Management Strategy

The stormwater management strategy originally proposed to manage the quantity of stormwater through a combination of techniques with on-site detention (OSD) supplemented by a large detention basin at Widemere East. The modification states that OSD will not be utilised on this site but states there will be an increase in the detention basin capacity from 164 000 m³ to 202 255 m³. No details have been provided on why the volume has changed or how the layout of the basin has changed. The modification application refers to a Stormwater Management Strategy prepared by GHD Pty Ltd (2007) but this has not been included in the exhibition documents. A copy of this report would potentially provide more details on the revised detention basin.

While a plan of the proposed detention basin has been provided and indicates all the inlet details, there is no detail on the outflow pipes or spillways. Details on the inflow and outflow hydrographs of this detention basin have also not been provided. Council has previously requested details of the connection to Prospect Creek, and details of any erosion control measures that might be implemented to minimise the impact on the creek. The connection details are important for Fairfield City Council to assess the erosive impact of this discharge to Prospect Creek.

Floodplain Management – No Adverse Impact

The report also states there is no change to the discharge from the basin and that this will be limited to 0.2 m³. Previous modelling conducted by Bewsher Consulting indicated that for the 100-year 9 hour storm (critical event for flows in the sections of Prospect Creek) the increase in flood levels due to an additional discharge of 0.2 cumecs is within the 10mm limit specified by Council.

Dam Safety

The report states that preliminary assessment by the Dam Safety Committee has categorised this dam to be in the "Significant" category. There may be some

amendments to the basin classification given the modifications to the size of the basin. As the basin is prescribed, the maintenance plan will need to include the monitoring schedules that comply with the requirements of the Dam Safety Committee. Fairfield City Council requests information pertaining to the final classification of the dam, information on who will be responsible for monitoring the dam and a copy of the Dam Safety Emergency Plan (DSEP).

Maintenance & Inspections

Council is reassured to see the inclusion of a Stormwater Infrastructure Plan within the modification application. However, again there is reference to a Stormwater Design Report, which has not been included in this report. There is reference to the "SEL Management" body responsible for maintenance of the drainage and detention basin structures. However, no information has been provided as to who comprises this group and to the life of this body, although there is reference to inspections being carried out over the life of the development. This issue needs to be clarified.

As the detention basin is prescribed, the DSEP will need to form part of the maintenance and inspection program.

No detail has been supplied as to the on-going cost of maintaining this system and who will be responsible for the cost. Information on life cycle costing has also not been provided to state when the system might be replaced, and how this might be funded. More details are required to specify who will be responsible for implementing the management plan and for maintenance costs.

Monitoring

The report also does not specify who will be responsible for the stormwater quality monitoring that is to be conducted prior to release of stormwater into Prospect Creek. Again there is reference in the documents to the Stormwater Design Report, and the report states that stormwater quantity and quality treatments for the SEL site are detailed here.

Council requests copies of all water quality reports that will be prepared in the future, and details of who will be responsible for collating this information.

3. Recommendations

Council recommends that the following conditions be included in the Minister's determination of the modification to the approval for the SEL:

Erosion to Prospect Creek

- Details of the connection of the detention basin to Prospect Creek be provided to Council to ensure erosion impacts on the Creek are minimised. Information on the

outflow pipes or spillways from the detention basin and the inflow/ outflow hydrographs of the basin to be provided.

Dam Safety

- Council requests information pertaining to the final classification of the dam, information on who will be responsible for monitoring the dam and a copy of the Dam Safety Emergency Plan.

Maintenance & Inspections

- That clarification be provided to Council on the "SEL Management" body responsible for maintenance of the drainage and detention basin structures and the membership of this group.
- That further details be provided to Council on the Stormwater Maintenance Plan, specifically responsibilities for its implementation and ongoing maintenance costs.

Monitoring

- Council requests copies of all water quality reports that will be prepared in the future, and details of who will be responsible for collating this information.

Council trusts that these comments are of assistance to the Department's assessment of the modification application. For any further information, please contact Council's Project Officer – Strategic Land Use Planning on 9725 0703 or email cgregory@fairfieldcity.nsw.gov.au

Yours sincerely



Carina Gregory
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