



22nd March 2013

Senior Environmental Planner
Major Development Assessment
Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

Attention: Christine Chapman

Dear Christine,

**Orica Southlands Remediation & Warehouse Development Project
Modification Application (MP 06_0191 Mod 1)**

Thank you for your letter dated the 6th March 2013, advising of Orica Australia Pty Ltd application for modification of their Southlands Remediation & Warehouse Development Project.

The level of consultation in regards to this application by Orica Australia Pty Ltd has been very limited and a review period of just over two weeks is particularly short to evaluate and review the submission. Notwithstanding this short period, Solvay Interlox Pty Ltd has reviewed the submission and has a number of concerns with the modification, as outlined below.

Traffic.

The traffic study by Traffix, dated the 25th February 2013 submitted as part of the modification application was undertaken on the basis of "Inclusion of Lots 7 & 8 within the Stage 1 development with a developable site area of some 23,422m²".

The development of Lots 7 and 8 are not part of Stage 1 and therefore not part of the modification application. The traffic study report should therefore be redone and only refer to Stage 1 works. In this case there would be reduction in the number of vehicle trips with the Proposed Modification of Stage 1 Warehouses from 233 per hour to 181 per hour. The reduction in traffic movements with the proposed modification is welcomed by Solvay Interlox Pty Ltd.

Any future development of Lots 7 & 8 (Stage 2) should require a separate traffic study to be undertaken, based on the actual traffic situation at that time, including the additional vehicle movements projected from modelling studies for the Stage 1 development.

Solvay Interlox Pty Ltd would not like to see the "New Link Road" between McPherson Street and Foreshore Road, widely discussed in the overall development plans for the Southlands site eliminated from any future Stage 2 development plans.

Flood Study.

Aurecon's Report dated 22 February 2013 Southlands – Detailed Design 2D Flood Re-Modelling – Addendum Advice Regarding Variation to Compensatory Flood Basin Design and Impact, represents only a statement of conclusion. There are no details provided in regards to the actual revised flood study.



Solvay Interlox Pty Ltd would like to express concerns over the impact of flooding on its adjacent property, especially with the lack of any supporting detailed study for the flood modelling work undertaken.

The summary report by Aurecon for the revised works concludes under the section on model results, that "there is no afflux on adjoining properties and in fact leads to a decrease in flood levels". This would not appear to be correct, particularly in the case of the 2 and 10 year event modelling. The original Stage 1 flood level difference maps ie Figures D9 and D10 show flood difference levels over our site "Below -0.02 ", whilst the revised maps D9a and D10a show food difference levels of "-.005 – 0.005 & -0.010 - -0.005" metres. This indicates that the flooding level in these cases would be higher than modelled in the approved Stage 1 development. The situation in regards to the 100 year event is not as clear from the contoured maps, but again does not appear to represent a decrease in flood level.

Solvay Interlox Pty Ltd also have concerns over inconsistencies between the revised flood modelling maps and the contour maps as part of the original Project Approval flood modelling report undertaken by Aurecon Australia Pty Ltd.

The three Stage 1 Development Scenario Flood Modelling Figures D4, D5 & D6 for the 50%, 10% and 1% AEP Flood Extents in Aurecon's Orica Southlands Remediation and Development Project Hydraulic Modelling Report, Rev. 3 dated 29.11.2010, respectively all show extensive flooding of the western section (Stage 2) of the Southlands development site. However the revised flood level difference maps Figures D9a, D10a and D11a in the Re-Modelling Report, all show no change to afflux levels over the newly created Lots 7 and 8. This is despite that fact that Lots 7 & 8 have been elevated above the nominated flood retention area. Solvay Interlox Pty Ltd would have expected to see a significant reduction in the flood level difference map over Lots 7 & 8.

Conversely with the contouring of the new detention area on the northern end of the Stage 1 development, Solvay Interlox Pty Ltd would expect to see significant increases in flood level difference maps, not a reduction in levels as indicated in Figures D9a, D10a and D11a.

Solvay Interlox would like to see the flood modelling for the revised Stage 1 development subject to independent review and confirmation of the conclusion in Aurecon's report.

Easements.

Solvay Interlox Pty Ltd has easements that run along the northern end of the entire Southlands development site. This easement was shown in the Proposed Easements drawing no. SRD DA017 (D) as part of the Stage 1 approval.

The latest Proposed Easement drawing no. SRD DA017 (F), only shows easement on the northern part of the Southlands site between Floodvale and Springvale Drains. There is no easement shown on the eastern side of Springvale Drain.

The Proposed Easements drawing should be revised to show Solvay Interlox Pty Ltd's easement through the entire northern section of the Southlands site.



Thanks again for the opportunity to make a submission in regards to this modification application for the Southlands site.

Yours faithfully

A handwritten signature in black ink, appearing to read 'R Bevan', with a horizontal line extending to the right.

Rick Bevan
Site Manager
Solvay Interlox Pty Ltd