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To: [Pamela Morales](#)
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Subject: Orica Southlands SSD 9691 - Mod 1
Date: Wednesday, 9 March 2022 9:47:47 AM
Attachments: [image001.png](#)
[image002.png](#)

Hi Pamela,

Thank you for notifying Council of the proposed modification of SSD 9691 at Orica Southlands. We have the following comments to make:

Impact on the Flood Retention Basin

In its response to the request for SEARs in 2018, Council made the following comments in respect of the proposed piers on the storage capacity of the basin:

'Further analysis is required in a flood study of the impact on flood flows and the reduction in storage capacity caused by the proposed piers. This should include an assessment from a structural engineer on whether the assumed pier diameter/width and spacing used in the modelling is appropriate for this structure and site, as well as the total volume of these piers to determine the reduction to available flood storage. The blockage assessment should be in accordance with ARR2016, with discussion of site-specific risks and results.'

In its response to the SSD application in 2020, Council made the following comments:

'Additional modelling and sensitivity analysis is required in the flood study, including: Examining the impact on flood flows and the reduction in storage capacity caused by the proposed piers.'

Council has consistently raised concerns regarding the issue of the impact of the piers on the storage capacity of the flood retention basin. There are now concerns that this proposed modification to the SSD represents the beginning of incremental reductions to, and impairment of, the flood storage capacity of the flood retention basin. In addition, Council asks that the following comments be considered by the Department when making its decision:

- The Flood Storage Assessment memo provided by Turnbull Engineering contradicts with the Environmental Impact assessment. EIA states that the diameter of the piles will be reduced to 400mm from original 800mm diameter. However, Turnbull Engineering calculated storage based on the 800mm diameter and as built survey;
- The EIA also indicates that a 10m wide corridor is proposed to allow maintenance of the flood storage basin underneath the warehouse podium. However, the preliminary structural plan confirms that the gap between piles will be reduced to 3.5 along the easement. The applicant needs to confirm whether a 3.5m gap will be sufficient to accommodate the maintenance vehicle for the whole area. A swept path analysis may be required to demonstrate that a maintenance vehicle can move freely around the basin;
- The Flood Impact Assessment (FIA) report prepared by BMT WBM is considered acceptable. BMT has confirmed that the offsite impact due to the development is negligible and similar to the original proposal. However, Council's concerns remains that this may be the first of multiple similar modifications to the SSD which will result in an incremental reduction in the flood storage capacity of the basin; and
- The FIA also assumes that the under-croft basin area will consist of a permeable layer. The

post-construction survey needs to confirm that the basin will remain as a permeable layer and a condition should be imposed to this effect.

I trust the above is helpful and will also make these submissions on the relevant page of the major Projects website.

Kind regards,
John



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