



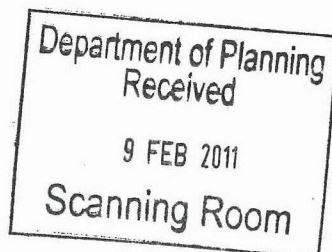
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Ref: D2011/628

Mr Chris Ritchie
Manager
Major Development Assessment
Department of Planning
GPO Box 39
SYDNEY NSW 2001



Attention: Emma Barnet

Dear Mr Ritchie

**COCA COLA AMATIL PLASTICS MANUFACTURING FACILITY
– Construction and Operation; Application Number: 10_0125**

I refer to your letter received 14 December 2010 inviting the Sydney Catchment Authority (SCA) to make a written submission on the Environmental Assessment (EA) for the Coca Cola Amatil Plastics Manufacturing Facility.

A critical item of public infrastructure, the Warragamba-Prospect Pipelines No 1 & 2, which are owned and managed by the SCA, are adjacent to the lands covered by the Coca-Cola Amatil Plastics Manufacturing Plant and potentially affected by the proposed development.

The SCA has a number of general concerns in regard to developments that may impact on the integrity of the pipelines and the SCA's ability to manage them. These include:

- **Management and maintenance of the pipelines**

The SCA needs to be able to maintain vehicle access to the pipelines and service corridor to undertake operations or maintenance. Development proposals adjacent to or crossing the pipelines may impact on the SCA's ability to safely and effectively access the pipelines for management and emergency purposes.

- **Integrity of the pipelines**

Development, especially major construction projects, potentially can have impacts on the integrity of the pipelines and service corridor. These impacts include changes in drainage and stormwater that may increase flooding, subsidence and erosion; unauthorised breaches of the corridor; and damage to the actual infrastructure of the pipelines, particularly during construction activities.

- **Security of the pipelines**

In the experience of the SCA, increased commercial, residential and transport development occurring adjacent or near to SCA's infrastructure has a direct correlation with an increased occurrence of security incidents. This includes trespass, malicious damage, rubbish dumping, arson, assault and threatening behaviour. The proximity of development can also have a detrimental impact on our ability to employ security measures of choice due to aesthetic, safety and other considerations. To counter such security risks, the SCA will incur an increase in costs as development encroaches on the pipelines, through new security works, increased patrolling and response, maintenance of new barriers, repair of damaged barriers, increased signage and lost time due to increased incident investigation.

The SCA has a number of specific concerns in regard to this proposed development and aspects of the Environmental Assessment. These include:

1. Protection of the Warragamba-Prospect Pipelines

As the Warragamba-Prospect Pipelines No 1 & 2 are critical public infrastructure for Sydney's drinking water supply, it is essential that appropriate measures are implemented to minimise the risk of damage to the pipelines and associated corridor.

The SCA requests that the following condition be included in any approval of the development:

The Proponent shall:

- *ensure that the Works do not damage the Sydney Catchment Authority's water supply infrastructure or reduce the safety of the operation of the infrastructure;*
- *repair, or pay all reasonable costs associated with repairing Sydney Catchment Authority infrastructure that is damaged by the project; and*
- *relocate, or pay all reasonable costs associated with relocating any infrastructure that the Sydney Catchment Authority considers needs to be relocated as a result of the project.*

2. Boundary fencing

To minimise the potential for the public to access the pipelines and associated corridor, the SCA request that the following condition be included in any approval of the development:

The Proponent shall:

- *ensure chain wire security fencing is erected along all common boundaries between the development and the Sydney Catchment Authority's pipeline corridor;*
- *the fencing is to be constructed to AS/NZS 1725:2003 – Chain-link Fabric Security Fencing and Gates, Appendix A, Type 2 T-B/B-T; and*
- *the fences are to be permanent and adequately maintained.*

3. Stormwater Management

The EA states that stormwater drainage will improve due to the existing hardstand area being converted to roofed area which enables rainwater capture storage and reuse. For this reason, no additional stormwater management is proposed as part of this development. The SCA supports rainwater capture storage and reuse and appropriate stormwater management and detention practices and recommends that such measures are required in order to minimise flooding in streams that cross the pipeline corridor.

4. Boundary retaining wall

The concept layout plan (No. Co9170.05-CSK02) displayed in Appendix 13 proposes a retaining wall along the boundary fence along SCA land. The SCA requests that the following condition be included in any approval of the development:

The Proponent shall ensure:

- *all work in relation to the retaining wall along the boundary fence along SCA land is constructed in a manner consistent with the drawings provided;*
- *work is undertaken solely within land owned by the proponent. SCA does not permit any entry on SCA land without prior specific approval;*

The issues for the SCA outlined above are significant, especially as the proposed project is part of a major intensification of development adjacent to the pipelines and associated corridor. The SCA would appreciate being involved in any further consultation process

associated with the application and the opportunity to comment on any draft conditions. Additionally, the SCA also requests that it be given the opportunity to review all plans for construction works and fencing along the SCA's pipeline boundary prior to works commencing.

If you wish to discuss any matter raised in this letter please do not hesitate to contact Jennifer Fry on 4725 2448 <jennifer.fry@sca.nsw.gov.au> or Neil Abraham on 4724 2456 <neil.abraham@sca.nsw.gov.au>.

Yours sincerely

 8/2/2011

GREG SHEEHY
Senior Manager Sustainability