

17 August 2022

Contact: *Justine Clarke*

Telephone: *0457 535 955*

Our ref: *D2022/93983*

Jonathan Kerr
Department of Planning & Environment
Transport Assessments
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Mr Kerr,

Exhibition comments – Westlink M7 Widening (SSD-663-MOD-6)

Thank you for your Major Projects Planning Portal referral dated 4 August 2022, inviting WaterNSW to comment on the Modification Report (MOD) for State Significant Infrastructure project M7 Motorway (SSI-663).

WaterNSW understands that the Westlink M7 Motorway widening (MOD 6) (the project) will include widening into the median and bridges, provision of additional exit and entry ways, utility works and location changes for supporting signage and toll gantries.

WaterNSW has a vested interest in this project as the Upper Canal, which lies in a tunnel under parts of the M7 corridor, and an associated vent shaft (shaft 4) that provides access into the tunnel section of the canal, is located within the centre median of the M7. The roadway also crosses the WaterNSW Warragamba to Prospect bulk water supply pipelines. WaterNSW owns and manages these critical components of Sydney's bulk water supply infrastructure, and it is essential that during the detailed design, construction and on-going use of the motorway that there is no impact to the structural integrity of these water supply assets and that they remain safe and serviceable at all times.

WaterNSW identify that the greatest risk to our assets from the proposed road widening works is at the Upper Canal - Shaft 4. WaterNSW's specific concerns include:

- impacts of vibration
- heritage impacts to this State listed asset
- damage to the asset from ground disturbance and road widening works
- access impediments for operation and maintenance of the Upper Canal system
- sediment and erosion control, and
- water quality and drainage impacts.

It is noted that the impacts to shaft 4 are predominantly listed and considered under non-aboriginal heritage (Chapter 7.8). However, the impact assessment considered the impacts from a heritage perspective. Whilst this is extremely important to WaterNSW, the impact to the physical asset from construction and operation is also a major factor that must be

considered. It is recognised that acknowledgement of impacts to WaterNSW assets is included in the modification report (utilities – section 4.3.8, land-use and property – section 7.9.5), and mitigation measures related to impacts to our assets are included (noise and vibration – chapter 7.2, non-aboriginal heritage – chapter 7.8, land-use and property – section 7.9.5), however it is still unclear what the extent of the impact to our assets will be. As such, we reserve the right to comment on the road widening design that will specifically impact on shaft 4.

WaterNSW requests that the proponent addresses the following in their response to submissions.

- Traffic and Transport – WaterNSW access to shaft 4 during construction and operation. WaterNSW suggests that construction access arrangements be included in any Construction Traffic and Access Management Plan (CTAMP) for WaterNSW's safe access to and operation of the asset. In addition, a new mitigation measure under operational capacity could be included to address future access needs for all users.
- Noise and vibration – Heritage and other sensitive structures are more prone to vibration impacts. The Upper Canal, specifically shaft 4, is recognised in the report as being the only State heritage listed asset impacted by the works, however the noise and vibration section does not specifically recognise this impact or the asset. To ensure the link between impact and mitigation measure, the Upper Canal should be recognised as a sensitive structure.

There is potential for the road to impact on the Upper Canal if WaterNSW's requirements are not adequately met. However, WaterNSW acknowledge the ongoing consultation between the M7 project team and WaterNSW, and notes that the project team has incorporated mitigation measures in their design to address our requirements.

Based on the information provided, WaterNSW has no objection to the proposed development, and requests that the suggested conditions (Attachment 1) are considered by the Minister, if approving the project. WaterNSW requests to be consulted as a key stakeholder throughout the project and have the opportunity to review and comment on drafted conditions of consent, design plans and construction management plans.

WaterNSW thanks the Department for notifying us of all proposals with the potential to impact on WaterNSW land, assets or infrastructure.

If you have any questions regarding this letter, please contact Justine Clarke at justine.clarke@waternsw.com.au.

Yours sincerely

A handwritten signature in black ink, appearing to read "Daryl Gilchrist".

DARYL GILCHRIST
Manager Catchment Protection

Attachment 1 – WaterNSW suggested consent conditions for SSI-663-MOD-6

General conditions

1. Implementation of the mitigation measures as stated in the Modification Report.
2. Before undertaking any work and during maintenance or construction activities, erosion and sediment controls must be implemented and maintained to prevent water pollution consistent with Managing Urban Stormwater: Soils and Construction Vol 1 4th ed. by Landcom, 2004 (The Blue Book).
3. The Proponent, where liable, must rectify any property damage caused directly or indirectly (for example from vibration or from groundwater change) by the work at no cost to the owner. Alternatively, the Proponent may pay compensation for the property damage as agreed with the property owner. Rectification or compensation must be undertaken within 12 months of completion of the work unless another timeframe is agreed with the owner of the affected surface or sub-surface structure or recommended by the Independent Property Impact Assessment Panel (IPIAP).

WaterNSW specific

4. The proponent must consult with WaterNSW regarding design, construction and operational management where the proposal interacts with bulk water supply infrastructure, ensure that proposed construction and operational agreements are consistent with the "Guideline for Development Adjacent to the Upper Canal and Warragamba Pipelines" (WaterNSW, 2021), and implement all practical measures to protect the bulk water supply infrastructure, or as otherwise agreed to by WaterNSW.
5. Consultation with WaterNSW during detailed design should include (but not be limited to) consideration of the following:
 - a) ground disturbance near shaft 4
 - b) safe construction and future access arrangements for WaterNSW Operations to access and maintain shaft 4
 - c) stormwater runoff management and modelling – WaterNSW will not accept any introduced surface water flows into the Upper Canal via Shaft 4.
6. Consultation with WaterNSW during development of the Construction Environmental Management Plan (CEMP) and relevant sub-plans. The CEMP should include (but not be limited to):
 - a) measures to protect Upper Canal water supply infrastructure at Cecil Hills Tunnel, including shaft 4, and to enable WaterNSW to access this infrastructure at all times
 - b) reference to relevant measures outlined in the current 'Guidelines for development adjacent to the Upper Canal and Warragamba Pipelines' (WaterNSW, September 2021)
 - c) vibration monitoring and management
 - d) groundwater monitoring
 - e) water quality monitoring
 - f) stormwater runoff management
 - g) access provisions

- h) erosion and sediment controls developed in accordance with the relevant requirements of Managing Urban Stormwater: Soils and Construction - Volume 1: Blue Book (Landcom, 2004).
 - 7. Consultation with WaterNSW during development of the Cultural Heritage Management Plan (CCHMP) prepared for the project as part of the CEMP.
 - 8. During construction and operation, specific mitigation measures must be implemented over WaterNSW infrastructure to achieve the vibration limits set out in the German Standard DIN 4150-3: Structural Vibration- effects of vibration on structures (for structural damage).
 - 9. During construction and operation, provide safe and unobstructed access for WaterNSW plant and personnel to access the Upper Canal - shaft 4 and Warragamba Pipelines Corridor, 24 hours a day, 7 days a week.
 - 10. Advise WaterNSW of any proposed amended or modified encroachment that could potentially impact the Bulk Water Supply Infrastructure.
 - 11. Notify any incidents that affect or could affect WaterNSW bulk water supply infrastructure to WaterNSW on the 24 hour Incident Notification Number 1800 061 069, as a matter of urgency.
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