

28 August 2020

Contact: *Justine Clarke*
Telephone: *02 9865 2402*
Our ref: *D2020/94098*

Bianca Thornton
Department of Planning and Environment
4 Parramatta Square
12 Darcy Street
PARRAMATTA NSW 2150

Dear Ms Thornton

Response to Submission comments – Kemps Creek Warehouse, Logistics and Industrial Facilities Hub (SSD 9522)

Thank you for your Major Projects Planning Portal referral dated 12 August 2020, seeking WaterNSW's comments on the Response to Submissions (RTS) for State Significant Development (SSD 9522) Kemps Creek Warehouse, Logistics and Industrial Facilities Hub at 657-769 Mamre Rd, Kemps Creek.

WaterNSW notes the proposal has been significantly revised to ensure that all built form is located outside the 1% AEP flood extent, and also to incorporate allowances for the Southern Link Road, Western Sydney Freight Line Corridor and Mamre Road upgrades. The amended proposal will include:

- *construction, fit-out and operational use of ten (10) warehouse buildings, including ancillary offices and bulk earthworks*
- *a two-stage Torrens Title subdivision, consisting of Stage 1 – five (5) residue allotments, and Stage 2 – 17 allotments*
- *provisions for 7.6 ha of RE1 Public Recreation (Open Space) land and 1.2 ha of RE2 Private Recreation land*
- *27 ha of land to remain undeveloped (located within the future Aerotropolis SEPP land – Wianamatta-South Creek Precinct and within the 1% AEP flood extent), and*
- *the widening of Mamre Road.*

WaterNSW owns and manages the Warragamba to Prospect Pipelines corridor (Pipelines corridor) which lies under Mamre Road, and forms the northern boundary of the site. The pipelines are critical water supply infrastructure, conveying water from Warragamba Dam to the Prospect Water Filtration Plant, and are an integral component of the Sydney drinking water supply system. It is essential this water supply infrastructure is protected from the potential impacts of development on adjoining land.

In July 2019, WaterNSW responded to the exhibition of SSD 9522 (our ref: D2019/67783) objecting to the development in its current form. This was due to the proposed changes in flood levels post-development, that would potentially have significant impacts on WaterNSW assets, infrastructure and land within the Pipelines corridor.

Studies commissioned by WaterNSW identify current hydrological flows are increasing the risk of pipeline failure (draft Pipeline and Corridor Master Plan, 2019) through the limited conveyance of runoff from local catchments within the Pipelines corridor, and backwater effects due to the corridor's proximity to large creeks or rivers. In addition, WaterNSW Asset Capability and

Condition Audits identify that scouring and misalignment of sills due to flooding impacts can lead to failure of the Pipelines. Therefore, any development proposal adjacent to this asset must not increase the current risk exposure to the Pipelines.

The applicant has addressed WaterNSW comments from the EIS response, regarding potential impact to WaterNSW assets. WaterNSW acknowledges the proposal has been significantly altered and that:

- *post-development flows that enter or are conveyed across the Pipelines corridor are equal to or less than the pre-development flows for each storm event up to and including 1% AEP event*
- *there will be no stormwater directed to or across the Pipelines corridor, and*
- *modelling verified that no net flooding or stormwater impact on the Pipelines corridor is expected.*

WaterNSW expects that Frasers Property and Altis Property Partners will carry out the listed infrastructure protection measures (RTS, p.157) as part of the development, and that these commitments are conditioned accordingly.

Notwithstanding, in order to protect Sydney's critical water supply infrastructure, WaterNSW has reviewed the RTS and provides detailed comments in Appendix 1.

It is noted that further consultation is required with WaterNSW on the Mamre Road widening project, and the water servicing provisions for the site, as they have direct consequences for the safe operation of our asset.

In addition, whilst not part of this development consent, WaterNSW advises that it does not support the Southern Link road alignment (Option 3) that crosses the Warragamba Pipelines Corridor as depicted on plan Co13362.00-DA700.

WaterNSW requests the Department continues to consult with us regarding proposals on land adjacent to and impacting on WaterNSW infrastructure, land or assets due to the potential for impact on water quality and water supply. WaterNSW requests that the Department provide a copy of the draft conditions for review and comment, prior to approval, to ensure all essential matters have been suitably included.

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

Yours sincerely



CLAY PRESRAW
Manager Catchment Protection

Appendix 1 – WaterNSW comments SSD 9522 RTS

WaterNSW notes the RTS for SSD 9522, providing additional advice below for consideration and reiterating previous suggested conditions for consideration in the final determination (our ref: D2019/67783).

Flooding

WaterNSW notes that additional modelling and assessment has been undertaken to address flooding and overland flow concerns.

Stormwater Management

WaterNSW requests that during the detailed design stage, measures must be developed ensure flooding and associated water quality and quantity risks within the Pipelines corridor are mitigated.

Requested conditions:

- *Detailed design for the development must consider and demonstrate the requirements of the WaterNSW publication ‘Guidelines for development adjacent to the Upper Canal and Warragamba Pipelines’*
https://www.waternsw.com.au/_data/assets/pdf_file/0011/55973/Guidelines-for-development-around-Warragamba-Pipelines-and-Upper-Canal.pdf.
- *Final levels and design of the proposal must not result in an increase in overland flow of water into the Pipelines corridor of either quantity or velocity, or a decrease in quality. The development must be designed, operated and maintained to ensure post-development flows do not exceed pre-development flows into and through the Pipelines Corridor.*
- *Stormwater directed to or across the Pipelines corridor is not acceptable, except at approved points of discharge for the development.*
- *Prior to construction commencing, the applicant is to prepare a dilapidation report identifying the condition of all infrastructure within the Pipelines corridor, from Mamre Road to South Creek, with specific attention paid to the Probable Maximum Flood (PMF) level. This report is to be supplied to WaterNSW for review at least four (4) weeks prior to works commencing.*
- *WaterNSW must be consulted should there be any impact on existing drainage structures during the works within or adjacent to the Pipelines corridor. Any impacted drainage structures must be reinstated and/or restored on completion of works at the applicant's expense, to the satisfaction of WaterNSW.*

Dam Dewatering

WaterNSW notes that preliminary dam dewatering works are required. The dewatering methodology should be designed and undertaken to ensure no flows are above the normal levels entering the Pipelines corridor, with specific measures incorporated into the Construction Environmental Management Plan (CEMP).

Requested conditions:

- *Water leaving the site during dam dewatering must not exceed pre-development levels.*
- *Dam dewatering mitigation measures are to be incorporated into the Construction Environmental Management Plan.*

Protection of WaterNSW infrastructure

Site preparation and construction can pose particular risks to WaterNSW infrastructure. It is vital that WaterNSW is actively involved in the development and assessment of detailed design plans and CEMPs for relevant parts of the development including the estate-wide earthworks, infrastructure and services and construction.

Construction Environmental Management Plan (CEMP)

The CEMP should consider the potential impacts to the Warragamba Pipelines corridor and include adequate mitigation measures to eliminate any risk. This includes recognising the Pipelines corridor as a critical area, with regards to Vibration Dose Values for Intermittent Vibration, and incorporating appropriate controls into the CEMP, where required.

Water Supply options

WaterNSW understands that the preferred water supply option for the Mamre Road Precinct is the extension and amplification of the existing Sydney Water mains from Erskine Park. The preferred extension and amplification will require the construction of a DN300 main, which provides Sydney Water with additional capacity to service other sites. WaterNSW is in preliminary discussions with Sydney Water regarding this preferred alignment and upgrade, as the new main will cross the Warragamba Pipelines corridor.

Utilities

WaterNSW has concerns for the servicing of new developments that require new assets to cross the Pipelines corridor. The clearance between the road and pipelines underneath in this location is shallow compared with other road crossings, and it has not been confirmed that all services can be accommodated within the existing design.

Dangerous goods

Due to the proximity of the development to state critical water supply infrastructure, WaterNSW expects notification of any combustible dangerous goods with the potential of explosion that could impact on the Pipelines corridor.

It is requested that future warehouse tenants on Lots 1, 2, 3 & 4 must not exceed the storage threshold levels for dangerous good listed in "Applying SEPP 33". If exceedance of the proposed quantities (as per Appendix 15) is sought, a Preliminary Hazard Analysis would be required. Applicants are required to seek approval from WaterNSW, in relation to the risk of explosion.

Requested condition:

- *Where exceedance of dangerous goods limits are sought by future tenants on lots 1 through 4, WaterNSW request the Preliminary Hazard Analysis is provided for review, to WaterNSW's satisfaction.*

Mamre Road widening

Additional conditions have been added below to cater for the upgrade of Mamre Road, to WaterNSW's satisfaction.

Requested conditions:

- *Prior to finalising the Construction Environmental Management Plan (CEMP), the applicant must consult with WaterNSW. The plan must include detailed procedures for managing the environmental impacts of construction, including stormwater, erosion and sediment controls, vibration, dust, and traffic management.*
- *WaterNSW must be provided with a copy of the final Construction Environmental Management Plan (CEMP) for estate-wide earthworks, infrastructure and services prior to works commencing, to allow for assessment of design and related works procedures and revisions as required.*

- *The applicant must implement all practical measures to prevent damage to WaterNSW water supply infrastructure that may result from construction or operation of the project.*
- *The applicant must repair, or pay all reasonable costs associated with repairing any damaged WaterNSW water supply infrastructure in a timely manner and to the satisfaction of WaterNSW.*
- *Stockpiles should not be placed in a position where they may interfere or otherwise impede associated WaterNSW drainage infrastructure.*
- *The applicant must develop a schedule for consultation with and approval by WaterNSW for the construction and widening of Mamre Road and associated utilities, over the Pipelines corridor.*
- *Evidence must be provided to the satisfaction of the Planning Secretary, demonstrating the design of the Mamre Road Upgrade crossing the Warragamba Pipelines corridor has been agreed with WaterNSW.*

Erosion and sediment control

It is critically important that the bulk earthworks are designed and undertaken in a manner that does not impact on the Pipelines corridor. Effective erosion and sediment control must be installed prior to any earthworks. The controls should be regularly maintained and retained until works have been completed and the ground surface stabilised or ground cover re-established.

Requested condition:

- *Erosion and sediment controls are to be designed, installed and maintained in accordance with the Blue Book, Landcom (2004) Managing Urban Stormwater: Soils and Construction.*

Security and fencing

In the experience of WaterNSW, development adjacent to the Pipelines corridor has a direct correlation with an increased occurrence of security incidents. Both temporary and permanent fencing (depending on the stage of development) is required for any interface with WaterNSW land.

Notwithstanding the proposed development is set back from the boundary, any infrastructure including footings for retaining walls must be built entirely within the development site.

Requested conditions:

- *Appropriate boundary identification (such as temporary construction fencing) must be installed prior to works commencing and must be maintained throughout the construction period.*
- *A fence 2.1m chain mesh plus 3 strand barbed wire on top, for a total height of 2.4m, is to be installed along the entire length of the boundary with WaterNSW, unless otherwise agreed to by WaterNSW.*

Access permits

For security and safety reasons, there is no public access into the WaterNSW Pipelines corridor at any time. A written access consent will be required for the preparation of the dilapidation report and should be applied for as early as possible.

The proponent of any works within the Pipelines corridor, or any of its contractors, may only enter WaterNSW land in accordance with an access consent issued under clause 9 of the WaterNSW Regulation 2013. Information on access permits is available on the WaterNSW website.

Requested condition:

- *Access to the WaterNSW Pipelines corridor is prohibited unless a written access consent has been obtained from WaterNSW.*

Notification of incidents

WaterNSW requires notification of any incident such as a vehicle accident, discovery of any heritage items, spill or fire that affects or could affect the WaterNSW Pipelines corridor. Any such incident should be reported to WaterNSW on the incident Notification Number 1800 061 069 (24-hour service) as a matter of urgency.

Requested condition:

- *All incidents that affect or could affect the WaterNSW Pipelines corridor must be reported to WaterNSW on the 24-hour Incident Notification Number 1800 061 069 as a matter of urgency.*

Commitments by applicant

WaterNSW notes that the requested conditions from our EIS response (our ref: D2019/67783) have been committed to by the applicant. WaterNSW request that the commitments agreed to by the applicant (at minimum) on page 157 of the Response to Submissions Report be included as consent conditions, in addition to the suggested conditions listed in this letter.
