

25 November 2021

Lepagier Consulting Pty Ltd  
PO Box 263  
Kellyville NSW 2155

**Att: Mirco Lepagier**

**Re: SSD-10396**  
**Sell & Parker Pty Ltd**  
**23-45 Tattersal Road, Kings Park**

Dear Mirco,

In response to Sydney Water's letter dated 1 October, 2021 in relation to SSD-10396 we offer the following response:

Comment	Response
Sydney Water has no objection to the proposal in principle.  However, we note there are multiple 525mm branch wastewater mains traversing the site.	Noted
Although the proposed development involves no demolition or construction works, Sydney Water understands the proposed position of heavy machinery stacking over and adjacent to the branch main running parallel with the centre north-south property boundary within the site poses potential risks to our assets.	Confirming that this application does not include any proposed demolition or construction works.  There will be no 'heavy machinery' stacking over and/or adjacent to the branch main running parallel with the centre north south boundary within the site.  Sydney Water have been provided with the TTPP report which demonstrates clearly that there is no heavy machinery stacking in those areas indicated or at all. This report is <b>attached</b> to this letter.
Depending on the pipe condition and results of any assessments, the asset may need to be replaced, remediated and/or reclined.	CCTV was provided as requested by Sydney Water on 2 November, 2021 and Sydney Water confirmed on 9 November, 2021 following review of that footage, Sydney Water advised that the CCTV video and accompanying report does <b>not</b> indicate any structural issues with the sewer that that would cause Sydney Water any concern.

Comment	Response
The proponent will need to engage a WSC and prepare a specialist engineering assessment (SEA) including a temporary asset protection plan to demonstrate how they will protect our infrastructure. The proponent must provide an accompanying completed SEA Checklist. This information should be submitted through the BPA application as part of Section 73 process.	Sell & Parker has engaged RMA Infrastructure, a WSC and specialist consultants who have undertaken the SEA assessment which will be submitted, as requested through the out-of-scope building plan approval process.
Any temporary loading situations also need to be assessed as part of the SEA to demonstrate negligible/acceptable impacts on our assets.	<p>The Traffic Management Plan and Stockpile Plan (attached), describe a strategy of traffic and thoroughfare only over the 525 dia Sewer asset.</p> <p>All loading and unloading is to be performed remote of the locations of Sydney Water asset and as such our conclusion demonstrate negligible/acceptable impacts on Sydney Water assets</p> <p>A more detailed response shall be provided by the WSC as part of the Section 73 response.</p>
Considering the size and importance of these branch mains, such loading may not be permissible, and the proponent may need to create exclusion zones for these critical assets to avoid any heavy machinery movements occurring over them.	<p>The Traffic Management Plan and Stockpile Plan, describe a strategy of traffic and thoroughfare only over the 525 dia Sewer asset. All loading and unloading is to be performed remote of the location of the assets.</p> <p>All heavy machinery associated with the loading and unloading also, will be remote of location the asset.</p> <p>A more detailed response shall be provided by the WSC as part of the Section 73 response.</p>
In addition, pre and post CCTV survey of the pipes that are at risk due to proposed work (despite the asset protection plan) is required to ascertain that our asset integrity is protected during the course of this project. Condition of the sewer needs to be incorporated into the assessment.	<p>There are no works to be undertaken and this will be reflected in the SEA report through the BPA application.</p> <p>Further Sydney Water has indicated in writing on 9 November, 2021 that the pipes have been assessed by Sydney Water through CCTV footage and report and that the service condition issues (roots and grease build up) and will be dealt with as part of the Sydney Water networks normal ongoing maintenance program.</p> <p>Given our assessment and the response of Sydney Water, it is not proposed that a post CCTV survey of the pipes is required.</p>
Geotech investigation should be undertaken as necessary to inform any loading assessment and design/protection measures.	A Geotech investigation has been undertaken and the report will be included in the WSC report to be filled.
All our maintainable assets and structures need 24/7 uninterrupted access for operations and maintenance purposes.	Noted

In preparing this response, we have referenced and relied up on the following;

1. Traffic Management Plan, prepared by **TTPP Transport Planning**, referenced "Metal Recovery Facility Kings Park, Swept Path Analysis 19m Articulated vehicle Project No. 19237 Drwg No. 19237Cad04 dated 17 November 2021; and
2. stockpile plan **Final Stockpile Plan Revision 02 dated 28 July, 2021** prepared for Sell & Parker Pty Ltd, and approved in Land and Environment Court proceedings [2021] NSWLEC 1563 and Fire Rescue NSW on 6 August 2021 as annexed to this report.
3. Sydney Water email dated 9 November, 2021.

Yours Faithfully,



Steven Penellum  
**RMA Infrastructure Pty Ltd**

1 October 2021

Our Ref: 173138, 187832

**Emma Barnett**

Senior Environmental Assessment Officer  
Industry Assessments  
Department of Planning, Industry and Environment  
4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150  
[emma.barnett@planning.nsw.gov.au](mailto:emma.barnett@planning.nsw.gov.au)

**RE: State Significant Development – Kings Park Material Recycling Facility (SSD-10396) at  
23-45 Tattersall Road, Kings Park**

Sydney Water thanks the proponent and DPIE for providing additional clarification regarding SSD-10396 which proposes to increase the capacity of the Kings Park Metal Recovery to receive and process up to 600,000 tonnes per annum from 350,000 tonnes per annum. Following Sydney Water's initial response dated 5<sup>th</sup> of November 2020 and our amended letter proceeding the RtS dated 5<sup>th</sup> of September 2021, Sydney Water has reviewed the application based on information supplied and provides the following amended servicing commentary.

**Critical Assets:**

- **Sydney Water has no objection to the proposal in principle.**
- However, we note there are multiple 525mm branch wastewater mains traversing the site.
- Although the proposed development involves no demolition or construction works, **Sydney Water understands the proposed position of heavy machinery stacking over and adjacent to the branch main running parallel with the centre north-south property boundary within the site poses potential risks to our assets.**
- Depending on the pipe condition and results of any assessments, the asset may need to be replaced, remediated, and/or relined.
- **The proponent will need to engage a WSC and prepare a specialist engineering assessment (SEA) including a temporary asset protection plan to demonstrate how they will protect our infrastructure and repair if necessary. This should be submitted through the BPA application as part of the Section 73 process. The proponent must provide an accompanying completed SEA Checklist.**
- The SEA must follow Sydney Water's SEA procedure and [Engineering Competency Standard](#) – *Assessment of Impacts and Structural Assessment of existing Buried Pipes DN375 to DN750*. Retrospective assessments and submissions should include the same level of detail, material and assessment as a non-retrospective submission.
- Any temporary loading situations also need to be assessed as part of the SEA to demonstrate negligible/acceptable impacts on our assets.
- Considering the size and importance of these branch mains, such loading may not be permissible, and the proponent may need to create exclusion zones, or other measures, for these critical assets to avoid any heavy machinery loading occurring over them.
- In addition, pre and post CCTV survey of the pipes that are at risk due to proposed work (despite the asset protection plan) is required to ascertain that our asset integrity is

protected during the course of this project. Condition of the sewer needs to be incorporated into the assessment.

- Geotech investigation should be undertaken as necessary to inform any loading assessment and design/protection measures.
- All our maintainable assets and structures need 24/7 uninterrupted access for operations and maintenance purposes.
- Detailed requirements will be provided once this documentation is submitted to and assessed by Sydney Water through the proponent's respective applications (see Attachment 1).
- For more information regarding SEAs, please see Section 1.10 of the [Technical guidelines – Building over and adjacent to pipe assets](#) and/or Sydney Water's Specialist Engineering Assessment Guideline/Procedure ( Doc D0001870 dated 19/2/2021).

### **Water Servicing**

- Indicative water balance indicates negligible increase in PW demands.
- Fronts a 100mm and 300mm main in Tattersall Road which are supplied from a 900mm trunk main located 180m west of the site in Vardys Road.

### **Wastewater Servicing**

- The site has multiple connection points to multiple sewer mains servicing the site which discharge to 525 branch mains.
- Detailed requirements will be provided at the Section 73 application phase.

This advice is not formal approval of our servicing requirements. Detailed requirements, including any potential extensions or amplifications, will be provided once the development is referred to Sydney Water for a Section 73 application. More information about the Section 73 application process is available on our web page in the [Land Development Manual](#).

Further advice and requirements for this proposal are in Attachments 1 & 2. If you require any further information, please contact the Growth Planning Team at [urbangrowth@sydneywater.com.au](mailto:urbangrowth@sydneywater.com.au).

Yours sincerely,

A handwritten signature in black ink, appearing to read "K. Leitch", with a stylized flourish extending to the right.

**Kristine Leitch**

Growth Intelligence Manager

City Growth and Development, Business Development Group

Sydney Water, 1 Smith Street, Parramatta NSW 2150

## Attachment 1

### Sydney Water Servicing

A Section 73 Compliance Certificate under the Sydney Water Act 1994 must be obtained from Sydney Water.

The proponent is advised to make an early application for the certificate, as there may be water and wastewater pipes to be built that can take some time. This can also impact on other services and buildings, driveways or landscape designs.

Applications must be made through an authorised Water Servicing Coordinator. For help either visit [www.sydneywater.com.au](http://www.sydneywater.com.au) > Plumbing, building and developing > Developing > Land development or telephone 13 20 92.

### Building Plan Approval

The approved plans must be submitted to the Sydney Water [Tap in™](#) online service to determine whether the development will affect any Sydney Water sewer or water main, stormwater drains and/or easement, and if further requirements need to be met.

*The Sydney Water [Tap in™](#) online self-service replaces our Quick Check Agents as of 30 November 2015.*

The [Tap in™](#) service provides 24/7 access to a range of services, including:

- building plan approvals
- connection and disconnection approvals
- diagrams
- trade waste approvals
- pressure information
- water meter installations
- pressure boosting and pump approvals
- changes to an existing service or asset, e.g. relocating or moving an asset.

Sydney Water's [Tap in™](#) online service is available at:  
<https://www.sydneywater.com.au/SW/plumbing-building-developing/building/sydney-water-tap-in/index.htm>

### Out of Scope Building Plan Approval

Sydney Water will need to undertake a detailed review of building plans:

1. That affect or are likely to affect any of the following:
  - Wastewater pipes larger than 300mm in size
  - Pressure wastewater pipes
  - Drinking water or recycled water pipes
  - Our property boundary
  - An easement in our favour

- Stormwater infrastructure within 10m of the property boundary.
2. Where the building plan includes:
- Construction of a retaining wall over, or within the zone of influence of our assets
  - Excavation of a basement or building over, or adjacent to, one of our assets
  - Dewatering – removing water from solid material or soil.

The detailed review is to ensure that:

- our assets will not be damaged during, or because of the construction of the development
- we can access our assets for operation and maintenance
- your building will be protected if we need to work on our assets in the future.

The developer will be required to pay Sydney Water for the costs associated with the detailed review.



## Attachment 2

### Requirements for **Business Customers for Commercial and Industrial Property Developments.**

#### **Trade Wastewater Requirements**

If this development is going to generate trade wastewater, the property owner must submit an application requesting permission to discharge trade wastewater to Sydney Water's sewerage system. You must obtain Sydney Water approval for this permit before any business activities can commence. It is illegal to discharge Trade Wastewater into the Sydney Water sewerage system without permission.

The permit application should be emailed to Sydney Water's Business Customer Services at [businesscustomers@sydneywater.com.au](mailto:businesscustomers@sydneywater.com.au)

A Boundary Trap is required for all developments that discharge trade wastewater where arrestors and special units are installed for trade wastewater pre-treatment.

If the property development is for Industrial operations, the wastewater may discharge into a sewerage area that is subject to wastewater reuse. Find out from Business Customer Services if this is applicable to your development.

#### **Backflow Prevention Requirements**

Backflow is when there is unintentional flow of water in the wrong direction from a potentially polluted source into the drinking water supply.

All properties connected to Sydney Water's supply must install a testable Backflow Prevention Containment Device appropriate to the property's hazard rating. Property with a high or medium hazard rating must have the backflow prevention containment device tested annually. Properties identified as having a low hazard rating must install a non-testable device, as a minimum.

Separate hydrant and sprinkler fire services on non-residential properties, require the installation of a testable double check detector assembly. The device is to be located at the boundary of the property.

Before you install a backflow prevention device:

1. Get your hydraulic consultant or plumber to check the available water pressure versus the property's required pressure and flow requirements.
2. Conduct a site assessment to confirm the hazard rating of the property and its services. Contact PIAS at NSW Fair Trading on 1300 889 099.

For installation you will need to engage a licensed plumber with backflow accreditation who can be found on the Sydney Water website:

<http://www.sydneywater.com.au/Plumbing/BackflowPrevention/>



## Water Efficiency Recommendations

Water is our most precious resource and every customer can play a role in its conservation. By working together with Sydney Water, business customers are able to reduce their water consumption. This will help your business save money, improve productivity and protect the environment.

Some water efficiency measures that can be easily implemented in your business are:

- Install water efficiency fixtures to help increase your water efficiency, refer to WELS (Water Efficiency Labelling and Standards (WELS) Scheme, <http://www.waterrating.gov.au/>
- Consider installing rainwater tanks to capture rainwater runoff, and reusing it, where cost effective. Refer to <http://www.sydneywater.com.au/Water4Life/InYourBusiness/RWTCalculator.cfm>
- Install water-monitoring devices on your meter to identify water usage patterns and leaks.
- Develop a water efficiency plan for your business.

It is cheaper to install water efficiency appliances while you are developing than retrofitting them later.

## Contingency Plan Recommendations

Under Sydney Water's [customer contract](#) Sydney Water aims to provide Business Customers with a continuous supply of clean water at a minimum pressure of 15meters head at the main tap. This is equivalent to 146.8kpa or 21.29psi to meet reasonable business usage needs.

Sometimes Sydney Water may need to interrupt, postpone or limit the supply of water services to your property for maintenance or other reasons. These interruptions can be planned or unplanned.

Water supply is critical to some businesses and Sydney Water will treat vulnerable customers, such as hospitals, as a high priority.

Have you thought about a contingency plan for your business? Your Business Customer Representative will help you to develop a plan that is tailored to your business and minimises productivity losses in the event of a water service disruption.

For further information please visit the Sydney Water website at:

<http://www.sydneywater.com.au/OurSystemsandOperations/TradeWaste/> or contact Business Customer Services on 1300 985 227 or [businesscustomers@sydneywater.com.au](mailto:businesscustomers@sydneywater.com.au).