

Bianca Thornton

From: Brendan.M Hurley [REDACTED]
Sent: Friday, 14 August 2020 12:25 PM
To: Bianca Thornton
Cc: Fire Safety
Subject: Response to Submission for Kemps Creek Warehouse, Logistics and Industrial Facilities Hub (SSD 9522). BFS20/2486

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

Dear Bianca,

I refer to the submission of the request for agency input into the Response to Submissions Report for the Kemps Creek Warehouse, Logistics and Industrial Facilities Hub (SSD 9522), dated the 12th August, 2020. The relevant parts of the proponent's Response to Submissions have been reviewed and the following comments are submitted for consideration.

FRNSW note that a SEPP 33 screening assessment was undertaken for the proposed development including the storage of related dangerous goods.

FRNSW reaffirm previous correspondence dated 21st of June, 2019 which requests the following:

- That each proposed warehouse building of the subject development is served by required fire systems that are independent of one another.
- That the certifying authority be required to make specific assessment and determination as to the applicability of Clauses E1.10 and E2.3 of Volume One of the relevant National Construction Code when considering future applications for construction certificates pertaining to fit out of the subject warehouses by prospective warehouse tenants.
- Where the future applicability of either Clause E1.10 or E2.3 of Volume One of the relevant National Construction Code is affirmed, that the certifier be required to seek FRNSW concurrence of any additional provisions that are proposed to be implemented to satisfy the requirements of either Clause E1.10 or E2.3.
- Road widths and turning circles, bends and roundabouts, are provided compliant with FRNSW policy No. 4 – Guidelines for Emergency Vehicle Access (link provided).
http://www.fire.nsw.gov.au/gallery/files/pdf/guidelines/vehicle_access.pdf
- Pursuant to Clause 142 of the local Government (General) Regulation 2005 (the Regulation), and to ensure that a ready supply of water is available to first responders for the purpose of extinguishing fires, that the development's water supply main incorporates fire hydrants installed in accordance with the requirements of the Regulation.

For further information please contact the Fire Safety Infrastructure Liaison Unit, referencing FRNSW file number BFS20/2486. Please ensure that all correspondence in relation to this matter is submitted electronically to firesafety@fire.nsw.gov.au.

Regards
Brendan



A/INSPECTOR BRENDAN HURLEY
TEAM LEADER INFRASTRUCTURE LIAISON
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PREPARED FOR ANYTHING.

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Our ref: DOC20/671159

Senders ref: SSD 9522

Bianca Thornton
Environmental Assessment Officer
Industry Assessments
Planning and Assessment Group
Department of Planning and Environment
4 Parramatta Square
12 Darcy Street
PARRAMATTA NSW 2150

Dear Ms Thornton,

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

Thank you for your email of 12 August 2020, requesting input from Environment, Energy and Science Group (EES) in the Department of Planning, Industry and Environment (DPIE) on the Response to Submissions (RtS) for Kemps Creek Warehouse, Logistics and Industrial Facilities Hub.

EES provided previous correspondence dated 23 July 2019 and EES have reviewed the RtS table prepared by Willow Tree Planning dated 6 August 2020 and makes the following comments.

Aboriginal Cultural Heritage (ACH)

Please note from 1 July 2020 ACH regulation, including advice regarding SSIs and SSDs, is now managed by Heritage NSW. The new contact for the ACH regulation team is heritagemailbox@environment.nsw.gov.au.

Biodiversity

EES was not provided with updated shapefiles nor access to the calculator file in BOAMS, so EES comments are based purely on the new BDAR and RtS table. EES has been unable to verify that the inconsistencies between the data in the BDAR, the shapefiles and the calculator have been rectified. EES is also unable to determine if the data has been entered correctly into the calculator. It should be noted that Table 25 of the BAM (Appendix 10), for example, clearly states that the shapefiles and spatial data are required to be provided.

Based on the above EES addresses the response to the comments made previously:

- The BDAR now appears to be assessing the proposal.
- The assessment of SAIL is now correct.
- Flora surveys were conducted in accordance with OEH guidelines from 2016. That report has been replaced by guidelines issued in April 2020 after most of the surveys for this proposal were conducted, so EES is unable to determine if they were in accordance with that document. The apparent 50m+ distance between survey traverses shown in Fig. 4.1 would make it difficult to detect the less visible species. As most of the site is exotic pasture, this is only problematic in the mapped native vegetation within the subject land. It is noted, however, that there is a low likelihood of the presence of any of the identified candidate flora species.

The only critical matter is the identification of PCTs as misidentification of PCT 849 as PCT 835 will result in both lower credit requirements and lower credit prices. The tabulated data in Appendix C of the BDAR is difficult to review as it is not in excel format, as required by the BAM.

Flooding

The report addresses flooding for the proposed development and its immediate adjacent areas, as a result, the impact of the development on flooding appears negligible for all flood events up to the PMF events. Appendix B shows the model outputs maps for developed condition, which shows that filling in the site is almost up to the PMF.

It should be noted that the planning proposal is in part of the South Creek Catchment and the whole catchment is subject to future development. The cumulative impacts due to changes in land use patterns and associated infrastructure within South Creek catchment should be considered. The development boundary proposed to be outside the 1% AEP, however the 1% AEP extent is not a static fixed line in nature, it is likely to be altered overtime due to the cumulative development within the South Creek catchment. Therefore, adopting a 1% AEP extent, which is a non-static line, as the boundary of the development will not ensure the precinct is not impacted by the 1% AEP. The South Creek Flood projects currently being undertaken under Stage 2 of South Creek Sector Review are considering the ultimate development scenario and associated developed flood behaviour which should guide decision on the next phase of planning for this State significant development (SSD 9522).

If you have any queries or would like additional information regarding this matter, please do not hesitate to contact Bronwyn Smith Senior Conservation Planning Officer on 02 8973 8604 or at Bronwyn.smith@environment.nsw.gov.au

Yours sincerely



26/08/20

Susan Harrison
Senior Team Leader Planning
Greater Sydney Branch
Environment, Energy and Science



Our reference: ECM: 9250127
Contact: Gavin Cherry
Telephone: 02 4732 8125

25 August 2020

Bianca Thornton

Email: Bianca.thornton@planning.nsw.gov.au

Dear Ms Thornton,

Response to Notice of Amended Plans and Amended Supporting Information for Kemps Creek Warehouse Logistics and Industrial Facilities Hub (SSD 9522)

I refer to the above request for advice received by Council on 12 August 2020. Thank you for the opportunity to comment on the proposed development. The following comments are provided for consideration in the continued assessment of the state significant development application:-

Plan of Subdivision – RE1 & RE2 Zoned Land

The amended proposal seeks the subdivision of the RE1 zoned land to separate it from the RE2 zoned land. This is of concern as the intended form and function of the RE1 zoned land separate from the RE2 zoned land is not yet known. The proposal sets up for severance of a connected open space corridor by virtue of separate lot creation. While the creation of Lot 14 in isolation is likely necessary due to the existing severance of the crown road and LRS registration requirements, it is recommended that Lot 15, 16 and 17 be amalgamated into a single allotment until such time as more detailed master planning is progressed for this part of the site, to better understand the intended ownership, embellishment and use of the entire open space corridor. It is noted that this could be addresses as a condition of consent.

Council has also previously requested detail from DPIE on what use is intended for the RE2 zoned land, as well as how connectivity between the public recreation lands to the north and south would be preserved. It is requested that any future use on the RE2 zoned land maintain north south public connectivity.

Freight Corridor Alignment

The proposed plan of subdivision identifies a possible freight corridor alignment to the immediate north of the site, with a nil boundary setback proposed from the car parking an manoeuvring areas to the identified corridor.

It was understood that the rail corridor was expected to be between 60-80m in width, which would suggest that the identified corridor width and resulting spatial arrangement adjoining the indicated corridor may not be sufficient. Any future or planned adjustments in the corridor alignment will have implications on the spatial arrangement of the development and parking car arrangements on Proposed Lot 1 and 2. It is recommended that the corridor alignment and associated corridor width be confirmed and agreed to by the relevant stakeholders.



Subdivision Master Plan – Section A-A Road Indications

The amended Subdivision Master Plan provides a Section A-A which implies that a road reservation is intended between the bio-basin lot and RE1 zoned land. The plan of subdivision however does not identify a road in this location and the verge widths as indicated in the Section Drawing are of concern. Section A-A on this plan should be deleted from the Subdivision Master Plan as it is assumed to be in error.

Water Quality and Quantity Management Matters

The proposed amended Stage 2 plan of subdivision now proposes Lot 11, Lot 12 and Lot 13 as separate lots for bio-basins which are outside the RE1 zoned land. Council supports the retention of private infrastructure within the development (and not within RE1 zoned land) as Council has not accepted any suggestion for dedication of private water management infrastructure. In conflict with the plans however, the amended Civil Design report still makes numerous references to Council taking on asset ownership and management through dedication which should be rectified.

It must also be noted that the development site is located within the Mamre Road Precinct Structure Plan. The NSW DPIE's '*Mamre Road Precinct Finalisation Report*' dated June 2020, Section 4.1.2.4 *Drainage Land* states:

"As part of precinct planning, Sydney Water are working on a Water Cycle Management Report that will inform the preparation of the precinct wide DCP. This has included a review of the drainage land and analysis of required regional drainage areas. It has been concluded that no land will be zoned SP2 Drainage. Land will however, be identified within the precinct wide DCP for drainage purposes. This will enable greater flexibility in the delivery of drainage requirement throughout the precinct, including by individual developments, without placing the burden of delivery and funding on Council. A draft DCP will be exhibited in the second half of 2020, for comment. This approach is similar to the drainage approach undertaken within the Erskine Park DCP."

The Civil Engineering Report by Costin Roe Consulting, reference 13362.00, revision D, dated 3 August 2020 (section 6.1) states that the proposed development sites will not require any lot specific treatment systems due to the estate wide management systems proposed. It recommended that all water quality and water quantity treatment be undertaken upon individual lots rather than the proposed two estate basins as proposed, given the financial burdens that are placed upon the intended owner of the basins through the future maintenance and upkeep of such basins. If estate basins are to be incorporated / retained as proposed, the Civil Design Report will need to outline how the basin infrastructure is to be managed and maintained in perpetuity. The management and maintenance obligations associated with these basins requires clarification as a community title subdivision would ensure the infrastructure could be contained in a community association allotment. If the proposal is maintained as a torrens title subdivision, easements, restrictions and positive covenants would need to be registered that address legal rights to drain into the lots and include security of management and maintenance obligations in perpetuity on the burdened lots.

In addition to the question of management and maintenance, the following points are also raised for consideration in the further assessment of the application if the basin arrangement as proposed is retained:-

- The Water Reuse commitments only include a 100kL tank on each lot plus a commitment to meet non potable by 80%. There are opportunities to increase this through passive irrigation of street trees and landscaping which could be addressed through conditions of consent.
- As proposed in the Civil Engineering Report, the stormwater treatment will be managed with the use of 2 large precinct style bioretention systems, with a filter area sized at 4,900m² and 1,500m². Each basin will be pre-treated with a CDS gross pollutant trap (GPT), located upstream of each of the stormwater management basins. There is potential benefit to provide additional treatment on the proposed lots as well as the two communal basins which is understood to be a provision within the Precinct Plan. This could also be addressed through conditions of consent.
- The proposed bioretention basin will also have capacity for OSD as no on-lot OSD is proposed. In larger storm events, the basins will be designed to store stormwater at depths up to 1.2m above the filter media. While this is an improvement on the earlier versions of the strategy, Council's Waterways Team has raised concern with design approach and have suggested that the systems should be reconfigured to ensure that maximum extended depths are minimized so that plantings as part of the biofiltration are not inundated / submerged.
- There are also concerns raised with the ability to physically access and maintain the basins. It is however appreciated that these aspects could potentially be addressed through a detailed water quality management and maintenance plan. If this was conditioned, it is requested that engagement with Council's Environmental Management – Waterways Team be included within the condition that requires engagement prior to finalization and approval of any management plan.
- The proposed methodology for the construction of the bioretention systems is to utilise a protective layer of geofabric until the development is finalized. In this regard, it is suggested that the bioretention systems be kept as sediment basins until a minimum of 90% the catchment they serve is developed. This is recommended to be addressed through conditions of consent and restrictions on title. This approach has been imposed by Council on a number of other subdivision developments where the bio-filtration intent of the basins should not be enacted until the erosion and sedimentation functions are close to completion.

Wastewater Management

The preferred servicing strategy for wastewater by both Altis/Frasers and Sydney Water is a reticulation gravity network to a single temporary pump out point with connection to sewer main to future Upper South Creek Wastewater Recycling Plant (pump out point would be removed). The approval and operation of this system would be under consent from Sydney Water and comments from Sydney Water on this aspect should be secured prior to determination.

Biodiversity Matters

The proposal is understood to seek the retention of riparian vegetation via an onsite Stewardship Agreement. Should this aspect not be supported, an alternate mechanism to protect this vegetation in perpetuity must be established.

The Environmental Construction Management Plan should also include the following:-

- Ensure appropriate timing of pre-clearance and dam de-watering protocols to allow for the *timely* execution of these actions
- In the interests of preparedness, the plan should include prior notification and involvement of qualified wildlife carer organisations such as WIRES
- The Ecologists plan for managing affected protected fauna
- Soft felling of hollow bearing trees is *encouraged*-this should be progressed as a standard requirement
- Consideration of the re-use of materials associated with vegetation clearing
- Inclusion of notifications and adaptive management, should any threatened species be identified during works

Strategic Planning Considerations

i) Infrastructure Contributions and Infrastructure Delivery

Local infrastructure contributions should be a requirement for a development of this scale. While it is understood that discussions have occurred between the Department and applicant around a potential VPA or works in kind agreement, discussions with Council on local infrastructure contributions do not appear to have occurred at this stage. It is therefore requested that the Department ensure that a mechanism for local infrastructure contribution collection is in place and addressed in conditions of any consent, prior to determination of the application.

It is also requested that the Department engage with Council's City Planning – Contributions Team to advise of the planned local infrastructure arrangements and contribution planning mechanisms prior to determination of the application. Without adequate understanding of the contributions and infrastructure framework to be established for this precinct, there may be additional matters which need to be funded and delivered by Council which may not have not been addressed in the VPA or WIK negotiations to date.

DPIE has also indicated in the past, that Council is to assume responsibility for local open space, which includes some of the RE1 space on this site (refer to page 6 of the Mamre Road Precinct Finalisation Report which suggests this). What is unclear from the documentation submitted is whether district open space delivery on this site is being planned for as part of the ultimate subdivision scenario. It is requested that this be confirmed as part of the assessment of this application.

ii) Implications of Draft Development Control Plan

The Draft Mamre Road DCP is expected to be released for consultation imminently and it will be important to consider that the development and exhibition of the precinct wide DCP may affect the current proposal (re layout, setbacks, envelope controls, etc). If the draft DCP is on exhibition or has been exhibited prior to the determination of the application, it is requested that the



Department ensure that this proposal is assessed fully against the draft policy for consistency. There is also concern that if the proposal is approved ahead of the Draft DCP being made available, then the objectives and deliverables identified in the Draft DCP will not be able to be realised, which will undermine the ability to secure those outcomes within the remainder of the Precinct.

iii) Road Design and Access

The Department is requested to confirm that the proposed road network, and road typologies aligns with the work that DPIE is doing in regards to traffic network for the Mamre Road DCP. If the network / typologies do not align with the work being undertaken by DPIE, then the proposal needs to be amended to comply.

It must also be confirmed that connectivity would be maintained across the crown reserve between Lots 14 and 15, once this area is made publicly accessible.

Further, noting that Mamre Road is likely to be used for public transport connectivity, consideration should be given to providing pedestrian connectivity with provision for passive surveillance between the southern east-west public access road and Mamre Road (i.e. in the area of Lots 8 / 9).

iv) Other Matters

The following additional design matters are raised for consideration by the Department in the finalisation of the assessment:-

- Lot 4 should include measures to provide passive surveillance over the adjacent open space (Lot 14), consistent with the Principles of the *Western Sydney Aerotropolis Plan* regarding development facing creeks / high quality open space.
- The lots to the west of the 1:100 year flood line will be dependent on the final use outcome of the Environment and Recreation zone under the Draft *Western Sydney Aerotropolis State Environmental Planning Policy*.
- A service facility is shown on the site under the structure plan. It may not be relevant as part of this application, but it should be ensured that delivery of such a facility is not precluded by this application.
- Given the status of a number of other State Significant Development Applications currently, there should be consideration as to how this application would interrelate with others in the precinct, and how they would all tie in together. Key aspects that require a cumulative consideration are:-
 - Construction and Operational Traffic Management;
 - Water Cycle Management and Earthworks; and
 - Visual Impact

Traffic Management and Parking Design Considerations

- As vehicular access to Mamre Road will be limited to the locations as per the Mamre Road Precinct Plan, the main internal north-south road will act as a local collector type road for the future industrial development of



adjoining lands to the south. The north-south road being 'Access Road 1', 'Access Road 3' and 'Access Road 2' proposes two 'T' intersections requiring heavy vehicles to make left and right hand turns at uncontrolled intersections which is not best traffic engineering practise for a road performing a collector type function. It is Council's recommendation that the internal north-south road be a main direct link road through the precinct to the adjoining lands to the south without any 'T' intersections.

- Consideration is also requested to be given to the provision of dedicated Electric Vehicle Charging Stations for at least 1% of car parking spaces and the provision for at least a further 4% of car parking spaces to be converted to Electric Vehicle Charging Stations as required in the future. This could be addressed as conditions of consent if this recommendation was supported.
- The following conditions are also recommended to be included in any notice of determination issued:
 - All vehicles are to enter and leave in a forward direction.
 - Prior to the issue of any Construction Certificate, the certifying Authority shall ensure that the plans include dimensions of driveways, ramps, aisles, parking spaces, accessible parking, bicycle parking, internal and external footpaths, service vehicle manoeuvring, loading areas compliant with AS 2890, AS1428, Penrith City Council Development Control Plan 2014 (Section C10) and Council's specifications.
 - Prior to the issue of any Construction Certificate the Certifying Authority shall ensure that plans include provision of at least a 1.5m wide concrete footpath from the footpath in the road frontage to the buildings principal point of entries.
 - Prior to the issue of any Occupation Certificate, the Certifying Authority shall ensure that appropriate signage, visible from the public road and on-site is installed to reinforce designated vehicle circulation and to direct staff / delivery vehicle drivers / service vehicle drivers / bicyclists / accessible parking / visitors to on-site parking, delivery and service areas.
 - Prior to the issue of any Construction Certificate, the Certifying Authority shall ensure that the plans include compliant sight lines and sight distances at the driveways in accordance with AS 2890.1, Figure 3.2 and Figure 3.3 and AS 2890.2 Figure 3.3 and 3.4.
 - All car spaces, manoeuvring areas and loading areas are to be sealed / line marked and dedicated for the parking, manoeuvring and loading of vehicles only and not to be used for storage of products / waste materials etc.
 - Prior to the issue of an Occupation Certificate, accessible parking is to be provided with accessible paths of travel to the buildings in accordance with AS 2890.6, to the satisfaction of the Certifying Authority.



- Prior to the issue of any Construction Certificate, the Certifying Authority shall ensure that the plans include complying numbers of secure, all weather bicycle parking, end of journey facilities, change rooms, showers, lockers are to be provided at convenient locations in accordance with Council Development Control Plan C10 Section 10.7, AS 2890.3 Bicycle Facilities and Planning Guidelines for Walking and Cycling (NSW Government 2004).

Flooding and Fill Impact Considerations

The Mamre Road Precinct Finalisation Report' dated June 2020, Section 4.1.4 Flooding states:

"Infrastructure NSW (INSW) is leading the South Creek Sector Review, which is a key recommendation of the 2018 State Infrastructure Strategy. The PMF is one of the considerations of the review. The outcomes of the review will inform the future DCP controls for the precinct. In addition to the above, a new flooding clause has been inserted into the WSEA SEPP, which requires a consent authority to consider of the cumulative impact of development including cut and fill. This is consistent with the Western City District Plan. Consideration of flood levels other than 1 in 100 year level are required by the Flood Plain Development Manual. It is best practice to consider the impact of greater flood events".

The Overland Flow Report by Costin Roe Consulting, reference 13362.00, revision C, dated 3 August 2020 has adopted Penrith City Council's DCP to ensure no adverse impacts occur to upstream or downstream properties during the 1% AEP flood event. The development site has been located clear of the 1% AEP South Creek flood extents and as such, no concerns are raised in this regard.

The development site however is proposed to be filled above the probable maximum flood (PMF) event for South Creek. The resulting fill platform is likely to result in adverse impacts to flood behaviour, for any flood event above the 1% AEP flood event. The cumulative impact of developments within the South Creek Floodplain, which involves filling up to the PMF, has not been addressed in the amended application and is a key consideration that needs to be found to be satisfactory, if the proposal is to be supportable.

Should the Department wish to discuss any matters raised in this correspondence further, or wish to have a meeting with Council's technical officers, please do not hesitate to contact me on 4732 8125.

Yours sincerely,

Gavin Cherry
Development Assessment Coordinator

Bianca Thornton

From: Kye Sanderson [REDACTED]
Sent: Tuesday, 25 August 2020 4:56 PM
To: Asini Rajapakse
Cc: Elizabeth Warren; PPO Engagement
Subject: FW: Response to Submission for Kemps Creek Warehouse, Logistics and Industrial Facilities Hub (SSD 9522)

Hi Asini

Thanks for getting in contact.

The Western Sydney Planning Partnership is responsible for undertaking the planning work to rezone land in the Western Sydney Aerotropolis. As a part of this work we will in the near future be rezoning land in through a new SEPP (the Western Sydney Aerotropolis SEPP). I understand the proposal covers land in the Western Sydney Aerotropolis and the Mamre Road Precinct which has recently been rezoned through the Western Sydney Employment Area SEPP. Based on a review of the plans, it appears that the area that is the focus of this application is in the Mamre Road Precinct and that there are open space buffers to land with the Western Sydney Aerotropolis.

Based on this:

- The Western Sydney Planning Partnership does not have any further specific comment in the RtS report
- It is recommended that you ensure that airport safeguarding provisions as contained in the Western Sydney Employment Area SEPP are complied with (linked below)

<https://www.legislation.nsw.gov.au/#/view/EPI/2009/413/part6/cl33f>

Feel free to get in contact if you need any clarification.

Regards



Kye Sanderson
Senior Planner, Aerotropolis
Planning Partnership Office

P: [REDACTED]
E: [REDACTED]



*I acknowledge the Traditional Custodians
of the land and pay respect to all Elders
past, present and future.*

26 August 2020

Our Ref: 179684

Asini Rajapakse

Student Planner

Industry Assessments

Department of Planning, Industry & Environment

4 Parramatta Square, Parramatta NSW 2150

asini.rajapakse@planning.nsw.gov.au

RE: RtS for SSD-9522 Kemps Creek Warehouse, Logistics and Industrial Facilities Hub

Thank you for notifying Sydney Water of SSD-9522 at 657-769 Mamre Road, Kemps Creek, which proposes development of a warehouse, logistics and industrial facilities hub including construction and operation of eight warehouses, comprising 166,225 m² of floor space, 744 parking spaces, and a 17-lot Torrens Title subdivision. Sydney Water has reviewed the application based on the information supplied and provides the following comments in line with our initial advice sent on the 5th of July 2019, to assist in planning the servicing needs of the proposed development.

Potable Water

- Limited potable water services are available in the area.
- A developer-led potable supply is being investigated to bring water from the north down Mamre Road to the site.
- Furthermore, Sydney Water is investigating a trunk main from the south along Mamre Road, anticipated by 2023-24. We will be working with TfNSW-RMS to deliver trunk mains in Mamre Road during road upgrades, subject to funding approval.
- Developer delivered precinct trunk mains will also be required to service the precinct.

Wastewater

- Long-term wastewater servicing for the proposed development will be provided from Sydney Water's proposed Upper South Creek Advanced Water Recycling Centre planned to be completed by 2025-26.
- Wastewater services to the proposed development may be initially staged to enable wastewater servicing from the St Marys Water Recycling Plant. This servicing should take up to two to three years to plan, design, and install. This timeframe is based on formal notification to Sydney Water of the expected date of connection.
- The developer would be responsible for all costs associated with the temporary servicing.
- While options for providing wastewater servicing to proposed development in isolation are technically viable, there is opportunity to investigate wastewater servicing options that meets the needs of the wider precinct.

Recycled Water

- Recycled water services are being investigated for the whole of the Western Sydney Aerotropolis Growth Area (WSAGA) including within this precinct.
- We are seeking information on potential recycled water demands, types of use and will provide further advice later in the year. Consideration should be given to incorporating third pipe reticulation and recycled water plumbing connections during your planning stages.

Stormwater

- Sydney Water is collaborating with the Western Sydney Planning Partnership Office, member councils, and agencies on typologies, flood, and waterway health models for the whole South Creek catchment. Consideration should be given to managing flooding and stormwater runoff quality.

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](#).

The developer will need to engage a Water Servicing Coordinator (WSC). The WSC will be the applicant's point of contact with Sydney Water. The WSC can answer most questions the applicant might have on Sydney Water's developer process and charges. For a list of authorised Coordinators, either call 13 20 92 or visit www.sydneywater.com.au ▶ Plumbing, building & developing ▶ Developing ▶ Providers ▶ Lists.

Further advice and requirements for this proposal can be found in Attachments 1 & 2. If you require any further information, please do not hesitate to contact the Growth Planning Team at urbangrowth@sydneywater.com.au.

Yours sincerely,



Kristine Leitch

Growth Intelligence Manager
City Growth and Development, 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 ► 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>

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

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.

Bianca Thornton

From: Cornelis Duba [REDACTED]
Sent: Thursday, 27 August 2020 2:35 PM
To: Bianca Thornton
Cc: DPE CSE Information Planning Mailbox
Subject: NSW Planning, Industry & Environment SSD-9522 Kemps Creek Warehouse, Logistics and Industrial Facilities Hub Response to Submissions

Hello Bianca

I refer to the Department's below email of 12 August 2020 regarding the Response to Submissions (RtS) for State Significant Development SSD-9522 at 657-769 Mamre Road, Kemps Creek (Lot 34 DP 1118173, Lots X & Y DP 421633, Lot 1 DP 1018318, Lot 22 DP 258414) for the Kemps Creek Warehouse, Logistics and Industrial Facilities Hub being the development of a warehouse, logistics and industrial facilities hub including construction and operation of eight warehouses comprising 166,225 m2 of floor space, 744 parking spaces and 17-lot Torrens Title Subdivision. Submissions needed to be made to the Department by 26 August 2020. I apologise for the late submission but trust that Endeavour Energy's recommendations and comments can still be considered.

In regard to Endeavour Energy's submission made to the Department on 9 July 2019 for the Notice of Exhibition for State Significant Development SSD 9522 Kemps Creek Warehouse, Logistics and Industrial Facilities Hub at 657-769 Mamre Road, Kemps Creek (Lot 34 DP 1118173, Lots X & Y DP 421633, Lot 1 DP 1018318, Lot 22 DP 258414) comprising site-wide earthworks, infrastructure and internal road network; construction and operation of 11 warehouses (165,186 m2 GFA); 816 parking spaces; and subdivision; Endeavour Energy has noted in the Consolidated Agency Response to Submissions that consideration has been provided to Endeavour Energy's recommendations and comments which in the 'Formalised Response' are indicated as being adhered to / complied with.

Endeavour Energy's further recommendations and comments are as follows:

- Network Capacity / Connection

Endeavour Energy's Asset Planning and Performance Branch has reviewed the Planning Report and Service Infrastructure Assessment and provided the following advice:

This application for connection of load for the ALTIS development is being dealt with under urban industrial subdivision UIS0849. A method of supply (MOS) has been for the first 11,000 volt / 11 kilovolt (kV) using part overhead and part underground from Mamre Zone Substation (ZS) (located at 8 John Morphet Place Erskine Park) to provide initial supply of up to 3.0 megavolt amperes (MVA) capacity.

Endeavour Energy have previously advised ALTIS that they will need a new 22,000 volt / 22 kV feeder from South Erskine Park ZS (located in the Oakdale Industrial Development Area) when it is available from late October 2022. This 22 kV feeder will need to cross-feeder tie into the Mirvac 22 kV feeder on the opposite side of Mamre Road in a suitable location to be determined by Endeavour Energy.

The first 11 kV feeder into UIS0849 being installed from Mamre ZS will be retained to permanently supply only up to 3.0 MVA in the northern triangle portion above the Sydney Water Pipelines but will also cross-zone tie into the new 22 kV ALTIS feeder via a 3 MVA 11 / 22kV auto-transformer at a suitable location to be determined by Endeavour Energy subject to ensuring no more than 3 MVA can be supplied from the auto-transformer in either direction. An easement will be required to accommodate this auto-transformer where it is required, some padmount substation / warehouse locations may be requested as double width / twin

transformer padmount substation easements to allow for future establishment of the auto-transformer once the best location for this is determined.

The planned 132,000 volt / 132 kV Aerotropolis feeder from South Erskine Park ZS to Bringelly ZS (located at 30 Greendale Road Bringelly), is proposed to follow the Bakers Lane road reserve in likely overhead construction and continues to Luddenham Road, Adams Road and The Northern Road.

The applicant should continue to contact Endeavour Energy's Network Connections Branch who are responsible for managing the conditions of supply and can be contacted via Head Office enquiries on telephone: 133 718 or (02) 9853 6666 from 9am - 4:30pm.

- Bushfire

Endeavour Energy has noted that the Bushfire Assessment Report indicates that the 'Council's Bushfire Prone Land Map shows that the site is classified as bushfire prone land with Category 2 vegetation located within the site'. Whilst the report provides an assessment of the site having regards to NSW Rural Fire Service 'Planning for Bush Fire Protection 2019'(PBP) it does not appear to electricity services.

Although industrial uses are not covered by Chapters 5 to 7 PBP, the aim and objectives of PBP still need to be considered and a suitable package of bush fire protection measures should be proposed commensurate with the assessed level of risk to the development. PBP provides the following advice regarding electricity services:

5.3.3 Services – Water, electricity and gas

Intent of measures: *to provide adequate services of water for the protection of buildings during and after the passage of a bush fire, and to locate gas and electricity so as not to contribute to the risk of fire to a building.*

Table 5.3c

Performance criteria and acceptable solutions for water, electricity and gas services for residential and rural residential subdivisions.

PERFORMANCE CRITERIA		ACCEPTABLE SOLUTIONS	
The intent may be achieved where:			
ELECTRICITY SERVICES	➤ location of electricity services limits the possibility of ignition of surrounding bush land or the fabric of buildings.	➤ where practicable, electrical transmission lines are underground;	
		➤ where overhead, electrical transmission lines are proposed as follows:	
		➤ lines are installed with short pole spacing of 30m, unless crossing gullies, gorges or riparian areas; and	
		➤ no part of a tree is closer to a power line than the distance set out in ISSC3 <i>Guideline for Managing Vegetation Near Power Lines</i> .	

The following is an extract of Endeavour Energy's Company Policy 9.1.1 Bushfire Risk Management:

9.1.1 BUSHFIRE RISK MANAGEMENT

1.0 POLICY STATEMENT

The company is committed to the application of prudent asset management strategies to reduce the risk of bushfires caused by network assets and aerial consumer mains to as low as reasonably practicable (ALARP) level. The company is also committed to mitigating the associated risk to network assets and customer supply reliability during times of bushfire whilst achieving practical safety, reliability, quality of supply, efficient investment and environmental outcomes. The company is committed to compliance with relevant acts, regulations and codes.

Accordingly the electricity network required to service the proposed development must be fit for purpose and meet the technical specifications, design, construction and commissioning standards based on Endeavour

Energy's risk assessment associated with the implementation and use of the network connection / infrastructure for a bushfire prone site. In assessing bushfire risk, Endeavour Energy has traditionally focused on the likelihood of its network starting a bushfire, which is a function of the condition of the network. Risk control has focused on reducing the likelihood of fire ignition by implementing good design and maintenance practices. However the potential impact of a bushfire on its electricity infrastructure and the safety risks associated with the loss of electricity supply are also considered.

Should you wish to discuss this matter, or have any questions, please do not hesitate to contact me. Due to the high number of development application / planning proposal notifications submitted to Endeavour Energy, to ensure a response contact by email to property.development@endeavourenergy.com.au is preferred.

With the current COVID-19 health risk, as many as possible of Endeavour Energy staff are working from home. As a result there is only a small contingent located at the Huntingwood head office for essential operations. Although working from home, access to emails and other internal stakeholders is now somewhat limited and as a result it may take longer than usual to respond to enquiries. Thank you for your understanding during this time.

Kind regards

Cornelis Duba

Development Application Specialist

Network Environment & Assessment

M: [REDACTED]

E: [REDACTED]

51 Huntingwood Drive, Huntingwood NSW 2148

www.endeavourenergy.com.au



27 August 2020

Our Reference: SYD18/01322/19

Departments Reference: SSD 9522

Bianca Thornton
Industry Assessments
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms Thornton,

RESPONSE TO SUBMISSIONS - KEMPS CREEK WAREHOUSE, LOGISTICS AND INDUSTRIAL FACILITIES HUB (SSD 9522)

Reference is made to the Department's referral dated 12 August 2020 with regard to the abovementioned State Significant Development Application, which was referred to Transport for NSW (TfNSW) Services for comments.

TfNSW has reviewed the abovementioned development application and does not support the proposed application in its current form. The following information is requested for further assessment prior to determination of the application:

1. Comment

The intersection of Bakers Lane and Mamre Road in the sequence 1A & 1B is not consistent with the ultimate TfNSW design for the intersection of Southern Link Road (SLR) and Mamre Road. The preliminary information provided for review by Altis/Fraser in March 2020 by Costin Roe Consulting provided the following intersection sequences:

- a. Sequence 1A has alignment with current Bakers Lane alignment.
- b. Sequence 1B has alignment matching current Bakers Lane alignment but widened to be consistent with the Mamre Road upgrade width and wide medians.
- c. Sequence 2 has the alignment with proposed SLR and Mamre Road alignment.
- d. Sequence 3 appears to be ultimate design with SLR continuing west through the development.

Recent designs for Sequence 1A & 1B provided by MUGroup on behalf of Fraser Property Group indicate that there is a departure from the abovementioned alignment of the wider medians required to be consistent with the Mamre Road upgrade. TfNSW provided further comments in letter dated 22 July 2020 see **Attachment A – TfNSW letter** on this matter indicating concerns with the proposed changes for the applicant to consider. TfNSW is currently assessing further updated documentation in response to this letter from the applicant.

Recommendation

The signal designs being presented in the development application should be consistent with plans being discussed with TfNSW to ensure that the approved development application design meets TfNSW requirements. It is recommended that further refinement

and clarification of the abovementioned sequences are undertaken to ensure that the concept plans meet TfNSW requirements for a safe and efficient intersection.

2. Comment

Furthermore the response to submissions makes reference to the design sequence plans and swept path analysis (inclusive of intersections) being included in Appendix 16. However there is no concept plans showing the designs commented on in point 2. Therefore it is difficult to determine whether the SIDRA modelling and designs are consistent.

Recommendation

TfNSW request the latest concept plans for all sequences outlined in Appendix 16, inclusive of the swept path analysis.

Following receipt of the above requested information, TfNSW will complete its assessment and advise its support (or) otherwise. Further information may be requested following completion of the review.

If you have any further questions, Ms Laura van Putten would be pleased to take your call on (02) 8849 2480 or please email development.sydney@rms.nsw.gov.au. I hope this has been of assistance.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Pahee'.

Pahee Rathan

Senior Land Use Assessment Coordinator

Attachment A – TfNSW letter



Transport
for NSW

22 July 2020

TfNSW Reference: SYD18/01322/15
Departments Reference: SSD 9522

George Elhage
MUGroup
[Email: George.elhage@mugroup.com.au](mailto:George.elhage@mugroup.com.au)

Dear Mr Elhage

REVIEW SIDRA MODELLING, TRAFFIC IMPACT ASSESSMENT AND CONCEPT SKETCH - WAREHOUSE & LOGISTICS HUB - 657-769 MAMRE ROAD - KEMPS CREEK

Reference is made to your correspondence dated 1 July 2020 with regard to the abovementioned Civil Works and associated Traffic Modelling Report, which were referred to Transport for NSW (TfNSW) for comment.

TfNSW has reviewed the documentation including the Concept Sketch, Traffic Impact Assessment (TIA) and electronic SIDRA files in support of the application. TfNSW provides comments and recommendations in **Attachment A – comments register**.

In addition to the comments provided in Attachment A, separate modelling comments relating to the submitted electronic SIDRA files and TIA are provided in **Attachment B – Modelling comments**. It is recommended that the comments provided in Attachment B are addressed prior to further review from TfNSW.

TfNSW has undertaken a preliminary review of the Construction Traffic Management Plan – *Ason Group 2/7/2020*. Preliminary comments are provided in **Attachment C – Construction Traffic Management Plan – Ason Group 2/7/2020**

As Bakers Lane is a Local road under the care and control of Penrith City Council, it is suggested that the proponent engages with the Council on all design discussions relating to the local road network to ensure that Council is in support of the design outcomes.

If you have any further questions, Laura van Putten, Land Use Planner at TfNSW, would be pleased to take your call on (02) 8849 2480 or please email development.sydney@rms.nsw.gov.au.

Yours sincerely

Pahee Rathan
Senior Land Use Assessment Coordinator

Attachment A – comments register

Strategic Design relationship with TfNSW future plans

1. It is noted that the MU Group Strategic Road Design for Mamre Road / Southern Link Road (SLR) differs from all other designs and is a departure from previous correspondence provided to assess this application. the following comments are provided for Altis/Fraser to consider:

- a. The design does not cater for the upgrade design ie wide medians and alignment with future SLR. This is a departure from preliminary design for the development which had alignment of Mamre Road at what appeared to be the consistent with the TfNSW Mamre Road Upgrade design.
- b. From the drawings from MU Group, the boundaries, especially the detailed boundary around the intersection at Bakers Lane is not consistent with the overall strategic design for Mamre Road and SLR. It should be noted that the boundaries previously sent were consistent with the DPIE boundaries in the Mamre Road Precinct for road reservation. It is recommended that Altis/Fraser and their designers should review the drawings and at a minimum match the road reservation boundaries.
- c. If the design presented by MU Group is constructed for Mamre Road, then the draft VPA contribution/credit will need to be re-reviewed. The calculations TfNSW provided to DPIE are based on Altis/Fraser incorporating our strategic design with wide median for future widening to 6 lane when required in the distant future. If MU group's design is considered in its current form, then TfNSW will have to do significant rework on Mamre Road so that it is consistent with the TfNSW future overall plans. At worst case scenario, the schedule of contributions amount in the proposed VPA will need to be reviewed downwards significantly.
- d. The intersection which consist of Bakers Lane and Mamre Road in the design by MU group is not consistent with the ultimate TfNSW design for the intersection of SLR and Mamre Road. The preliminary information provided for review by Altis/Fraser in March 2020 by Costin Roe Consulting provided the following intersection sequences:
 - i. Sequence 1A has alignment with current Bakers Lane alignment.
 - ii. Sequence 1B has alignment matching current Bakers Lane but widened to match the Mamre Road upgrade width and wide medians.
 - iii. Sequence 2 has the alignment with proposed SLR and Mamre Road alignment.
 - iv. Sequence 3 appears to be ultimate design with SLR continuing west through the development.

The design by MU Group appears to be a departure from Preliminary design from Costin Roe Consulting. The new design raises questions such as, will this design only cater for Sequence 1A? Will additional design for Sequence 1B and Sequence 2 be also available for review by TfNSW?

2. It is unclear how the new design will cater for access to the Water NSW Pipeline. In addition the design should ensure that protection of the pipeline is maintained. It is recommended that the proponent consults with Water NSW to ensure that safe access is able to be achieved within the new proposed design.
3. The design should take into account the Western Sydney Freight Line (WSFL). TfNSW can provide further advice on the WSFL upon request.

Strategic Design – Preliminary comments

4. Raised medians with signal posts are required on Mamre Road, due to the wide 5 lane approaches.
5. Raised medians should be considered on Baker Street to provide separation from heavy vehicle turning movements.
6. T1 turn lines are incorrectly located and are not required for single turns.
7. Swept paths for the 26 metre B-double design vehicle per report are to be provided.

It is recommended that the above comments are incorporated in the design.

More detailed comments can be provided once a more detailed design is submitted.

Additional Modelling Comments

8. The modelling for southbound vehicles turning right into Bakers Lane shows a maximum queue length of 216.5 metres, however the design shows a right turn bay of 200 metres. There is a safety risk with vehicles queuing in the right turn bay overflowing into the through lane if there is insufficient storage length. It is recommended that the design is updated to ensure that the maximum queue lengths can be accommodated in the design.

**Attachment C – Comments Construction Traffic Management Plan – Ason Group
2/7/2020**

1. The Construction Access 1A for the development is via Bakers Lane. In Construction Access 1B, access into the development is via a temporary access road south of Bakers Lane whilst the intersection of Bakers Lane is reconstructed. Having an alternate temporary access south of an existing intersection is not ideal and preference is all traffic access should be maintained at Construction Access 1A.
2. Construction Access 1B is maintained during Stage 2 of the development at the same time the intersection of Mamre Road and Bakers Lane is operational. It is recommended Construction Access 1B should be decommissioned/closed when intersection of Mamre Road and Bakers Lane is operational. Construction Access 1B is not supported during Stage 2 works.
3. The proposed Construction Access 3 north of intersection of Mamre Road and Bakers Lane for Stage 3 is not supported when access is possible via internal road network and an operational intersection of Mamre Road and Bakers Lane.
4. In the Construction Traffic Management Plan (CTMP), there is no indication of the turnaround location for construction traffic originating from the north. This will need to be identified as part of the assessment of the development.

The CTMP by Anson Group 2/7/2020 is not supported at this stage. Further refinement is required for TfNSW to complete the review.

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.watarnsw.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.
