

Kate MacDonald
Team Leader
Industry Assessments
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

D2016/4188

Attention: Leanne Grove

Dear Ms MacDonald,

**Proposed Warehouse and Logistics Hub 585-649 Mamre Road, Orchard Hills (Penrith LGA)
– SSD 7173**

I refer to the notice of exhibition for the above project as exhibited on the Department's website 9 May 2016, and the associated rezoning proposal that is adjacent to the Warragamba Pipelines corridor. The Pipelines are critical water supply infrastructure transporting water from Warragamba Dam to the Prospect Water Filtration Plant. The infrastructure and corridor within which the Pipelines are located is owned and managed by WaterNSW. The corridor is categorised as a 'controlled area' under the *Water NSW Act 2014*. As such any access to the corridor is prohibited unless WaterNSW has provided its written consent.

In August 2015 WaterNSW was consulted with regard to input in the form of its key issues and assessment requirements to inform the development of Secretary's' Environmental Assessment Requirements (SEARs) for this proposed development (our ref: D2015/90575). The environmental impact statement (EIS) for SSD 7173 acknowledges WaterNSW's issues and makes a commitment to give them due consideration in the design, noting that these requirements would be able to be satisfied. However, the proposed works as outlined and assessed including the proposed road works on Mamre Road raise the following key concerns for WaterNSW.

Proposed road works

WaterNSW notes that the proposed road works associated with the intersection upgrade include construction of new lanes on Mamre Road, including where the road crosses over the Pipeline. This proposal raises a number of issues for WaterNSW:

- The widening of Mamre Rd will remove the large turnout areas currently used by WaterNSW staff and contractors to access the Pipeline corridor safely. These turnout areas are vital for the safe, 24-hour traffic movements of all vehicle types, including for large trucks required for maintenance and repair purposes, and security.
- On the western side of Mamre Road there are two major valves above ground and directly adjacent to the boundary fence. The road widening will mean any new turnout will be located closer to the valves than is currently the case. This has not been considered in the engineering drawings, which must be revised to address this issue.
- Also on the western side, the Pipelines are concrete encased at road level. This requires the level of the new road to be raised, which in doing so will also increase the steepness of the turnout areas.
- Fencing has been identified and it is noted that WaterNSW needs to be part of the process for determining fence type. WaterNSW minimum requirements are for either a 2.1m chain mesh fence with three strand barbed wire on top, or a 2.1m palisade fence.

- There has not been any consideration of WaterNSW's need to be able to access the northern and southern boundary line of the Pipelines, and there does not seem to be any allowance for this in the widening of Mamre Road.
- The road design must include measures to protect the valves and general corridor from the potential runoff from the proposed new lanes.

The proponent must consult with WaterNSW regarding the proposed works over the Pipeline corridor prior to the finalisation of these plans.

Stormwater

The southwestern corner of the proposed development described as Block 4 is shown in the bulk earthworks cut and fill plan (Drawing: C012042.00-DA30 Bulk Earthworks Cut/Fill Plan) as being subject to a borrow pit. WaterNSW notes that this area was originally excluded from development as a result of flood concerns, and is currently used to convey stormwater from the Pipeline corridor. WaterNSW requires that the flow of stormwater from the Pipeline corridor must not be impeded or caused to flow back to the corridor.

Erosion and Sediment Control

The erosion and sediment control plan for the proposed development contains no details of controls for the area of Block 4 noted in the EIS and the associated bulk earthworks cut and fill plan as a "borrow pit". To ensure there will be no impact to the Pipeline corridor during the construction phase, WaterNSW requires the EIS and the associated erosion and sediment control plans to be updated to reflect inclusion of these requirements.

Flood Management

The proposed development includes earthworks that will result in an elevated batter along the boundary between the Pipeline corridor and the proposed development. The Pipeline corridor contains a raised berm that acts to direct stormwater from the subject site away from the corridor to existing drainage depressions. It is understood that the outcome of the flood studies was to require a portion of the land proposed for rezoning and development, specifically in Block 4, to be left undeveloped for flood management purposes. However, as the Pipeline corridor is not included in these assessments it is not clear what the impact of the development is on flood regimes. WaterNSW requests the consideration of the impact of the proposed development on flood regimes for the Pipeline corridor.

In addition it is understood that this same area is to be subject to works for the purposes of use as a borrow pit. As the construction of the borrow pit is not included in the flood assessment and the EIS and its associated documents do not contain information on the management or final plan for this area it is not clear what impact the proposed works may have on the flood regimes for the Pipeline corridor.

Security Fencing

It is noted that the EIS gives an undertaking that WaterNSW's security fencing requirements will be incorporated in the design. However the drawings and details provided on the design do not provide any detail in this regard. WaterNSW requires that it be consulted to determine the specific security fencing requirements for the southern boundary of the proposed development with the Warragamba Pipelines corridor.

Access

If access is required to any part of the corridor for works of any kind, written access consent is required from WaterNSW. No works are to be carried out in the corridor without consent.

Information on access consents is available at

<http://www.waternsw.com.au/water-quality/catchment/manage/special-areas/access>

Proposed future development works – WaterNSW requests further consultation as part of any proposed future adjacent development of the unoccupied allotments that may impact on the

pipeline to ensure consideration of its key issues and incorporation of its assessment requirements for adjacent development.

WaterNSW notes that these comments are based on the documents viewed on the Department's website on the 11 May 2016. In the case that there are changes to the SSD application as outlined and assessed in these documents WaterNSW requests that it be advised to determine the extent of any possible impact.

Please contact Richard Sheehan, Environmental Planning Adviser on 02 4724 2446 or via email at richard.sheehan@waterNSW.com.au if you have any further questions.

Yours Sincerely

A handwritten signature in dark ink, appearing to read 'Fiona Smith', written in a cursive style.

FIONA SMITH

Executive Manager. Water Quality Catchment Protection and People and Culture

31.5.16

