

5 July 2019

Contact: *Justine Clarke*
Telephone: *02 9865 2402*
Our ref: *D2019/67783*

Jess Fountain
DA Coordinator
Key Sites and Industry Assessments
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Attn: William Hodgkinson

Dear Ms Fountain

Exhibition comments – Kemps Creek Warehouse, Logistics and Industrial Facilities Hub (SSD 9522)

Thank you for your email dated 5 June seeking WaterNSW's comment on State Significant Development (SSD 10330) Kemps Creek Warehouse, Logistics and Industrial Facilities Hub at 657-769 Mamre Rd, Kemps Creek. WaterNSW notes the development is within the Western Sydney Employment Area and includes:

- demolition of existing structures, site-wide earthworks, landscaping, stormwater and other infrastructure and an internal road network
- construction and operation of nine warehouses comprising 163,671m² of floor space
- intersection upgrade works in Mamre Road
- 754 parking spaces
- 33-lot Torrens Title subdivision.

WaterNSW owns and manages the Warragamba to Prospect Pipelines corridor (Pipelines corridor) which 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.

WaterNSW understands a 60-metre setback along the northern boundary of the subject site, between the Pipeline corridor and the development will be created to accommodate the future Western Sydney Freight Line (WSFL) corridor. Although a buffer exists, there is still potential for impact on the Pipelines corridor if the following advice is not implemented during the construction and operational phases.

In September 2018 WaterNSW responded to the request for Secretary's Environmental Assessment Requirements (SEARs) (our ref: D2018/96427). The issues raised in that response are still relevant to the current application.

WaterNSW has reviewed the Environmental Impact Statement (EIS) and associated documents submitted by WillowTree Planning on behalf of the Applicant. ***WaterNSW objects to this development application in its current form due to proposed changes in flood levels post-development that will have the potential to significantly impact WaterNSW assets, infrastructure and land within the Pipelines corridor.***

Flooding

WaterNSW understands the Overland Flow Report prepared by Costin Roe Consulting (2019) analysed a full range of flood events for the site including the Probable Maximum Flood (PMF) level. The Overland Flow Report confirms that the proposed final levels can accommodate the proposed design, for which no adverse impacts to the existing flows would occur. However WaterNSW has serious concerns as to the potential impact of the flood waters on the Pipelines and the foundations with concentrated water flows and expected increased velocities from South Creek due to the development.

WaterNSW requires that post-development flows that enter or are conveyed across the Pipelines corridor must be equal to or less than the pre-development flows for each storm event up to and including 1% AEP event.

WaterNSW understands there will be a potential decrease in flood surface levels adjacent to the development on the eastern and western banks of South Creek, and upstream of the proposed development due to an increase in flood water storage capacity onsite. However, within the WaterNSW corridor directly adjacent to the development, an increase in flood levels is demonstrated in a post development scenario.

There is also potential for floodwaters to extend further up the Pipelines corridor than currently mapped due to the raised level of the development site resulting from earthworks, narrowing the flow path for stormwater. This also has the potential to result in scouring of the Pipelines corridor and destabilisation of the anchors and sills supporting the Pipelines. All development works must be undertaken in a manner that avoids any impact on the Pipelines infrastructure.

WaterNSW notes that for 1% AEP flood level of South Creek, the flood surface height varies in level from RL 35.20m AHD at the upstream southern end of the site to RL 33.60 m AHD at the downstream northern end of the site. Anecdotal reports from WaterNSW staff advise that during a minor rain event in early 2016, the floodwaters from South Creek reached the centre line of the Pipelines (RL 34.24).

The Overland Flow Report (2019) notes that stormwater management measures have been designed to ensure that post-development stormwater flows will be attenuated to pre-development stormwater flows. These measures include conveyance of surface runoff, management of water quantity (through on-site detention) and water quality (through on-site and estate wide management systems) using Water Sensitive Urban Design principles and current best practice pollution reduction objectives. However, the modelling within Appendix B of the Overland Flow Report (2019) contradicts this and demonstrates an impact on WaterNSW assets.

If the above matters can be resolved with no net flooding or stormwater impact on the Pipelines corridor, WaterNSW offers the following comments and requirements for your consideration of the proposal.

Stormwater Management

WaterNSW requests that during 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 water into the Pipeline corridor of either quantity, quality or velocity. 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 point 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 4 weeks prior to works commencing.*
- *WaterNSW shall 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 shall be reinstated and/or restored on completion of works at the proponent'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 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.

Requested conditions:

- *WaterNSW shall be consulted on the final Construction Environmental Management Plan (CEMP) for estate-wide earthworks, infrastructure and services eight (8) weeks prior to works commencing, to allow for assessment of design and related works procedures and revisions as required.*
- *The proponent shall implement all practical measures to prevent damage to WaterNSW water supply infrastructure that may result from construction or operation of the project.*
- *The proponent shall 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.*

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. These can include trespass, malicious damage, rubbish dumping, arson, assault and threatening behaviour. Both temporary and permanent fencing (depending on the stage of development) is required for any interface with WaterNSW land.

Where batters or retaining walls are to be installed adjacent to the Pipelines corridor (proposed lots 1,2,3,10,11,19, and 20) they should be set back from the boundary, with all footings for retaining walls built entirely within the development site.

Requested conditions:

- *Appropriate boundary identification (such as temporary construction fencing) shall be installed prior to works commencing and shall 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.*
- *Any existing rural fencing shall be removed and disposed of at an appropriate waste facility licensed to accept the waste.*

WaterNSW access

Any structure and any related works must be designed, constructed and operated in such a way that does not restrict WaterNSW from operating and maintaining the pipelines. This includes not restricting vehicle or machinery access to or along the existing management roadway within the Pipelines corridor.

Requested condition:

- *24 hour all weather access to the WaterNSW Pipelines corridor shall be retained or provided for WaterNSW staff and contractors.*

Access permits

For security and safety reasons, there is no public access into the WaterNSW Pipelines corridor at any time. 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 shall be reported to WaterNSW on the 24 hour Incident Notification Number 1800 061 069 as a matter of urgency.*

WaterNSW requests that it continues to be consulted on the Kemps Creek Warehouse, Logistics and Industrial Facilities Hub (SSD 9522) project, advised of the determination of this application and provided with a copy of the notice. All correspondence should be emailed to Environmental.Assessments@waterNSW.com.au.

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

Yours sincerely



FIONA SMITH
Executive Manager Water & Catchment Protection