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Haley Rich
Major Development Assessment
Department of Planning
GPO Box 39
SYDNEY NSW 2001

Dear Ms Rich

MAJOR PROJECT APPLICATION
JACFIN HORSLEY PARK PROJECT – Concept Plan & Concurrent Project
Application for Employment Lands and Stage 1 Industrial Development
Application Numbers MP 10_0129 & MP 10_0130

Thank you for the invitation to comment on the Environmental Assessment (EA) for the above project.

A critical item of public infrastructure, the Warragamba-Prospect Pipelines No 1 & 2, which are owned and managed by the Sydney Catchment Authority (SCA), are to the north of the lands covered by the Jacfin Horsley Park Project and potentially affected by the proposed development.

The SCA has a number of overall concerns in regard to developments that may impact on the integrity of the pipelines and the SCA's ability to manage them. These include:

- **Management and maintenance of the pipelines:** The SCA needs to be able to maintain vehicle access to the pipelines and service corridor to undertake all manner of operations or maintenance. Development proposals adjacent to, or crossing the pipelines may impact on the SCA's ability to safely and effectively access the pipelines for management and emergency purposes.
- **Integrity of the pipelines:** Development, especially major construction projects, potentially can have impacts on the integrity of the pipelines and service corridor. These impacts include changes in drainage and stormwater that may increase flooding, subsidence and erosion; unauthorised breaches of the corridor; and damage to the actual infrastructure of the pipelines, particularly during construction activities.
- **Security of the pipelines:** In the experience of the SCA, increased commercial, residential and transport development occurring adjacent or near to SCA's infrastructure has a direct correlation with an increased occurrence of security incidents. This includes trespass, malicious damage, rubbish dumping, arson, assault and threatening behaviour. The proximity of development can also have a detrimental impact on our ability to employ security measures of choice due to aesthetic, safety and other considerations. To counter such security risks, the SCA will incur an increase in costs as development encroaches on the pipelines, through new security works, increased patrolling and response, maintenance of new barriers, repair of damaged barriers, increased signage and lost time due to increased incident investigation.

The EA states that the SCA was consulted on 19 August 2010 and SCA's main concern relates to the pipe crossings. SCA notes this consultation comprised a single phone call. The EA describes Jacfin's response as: *Advised that the regional road layout has been designed to be consistent with the WSEA SEPP*. This single matter does not represent the primary issue of concern to the SCA.

The EA states that stormwater drainage management will be designed so that post development 100 year ARI flows will be maintained at pre-development rates to ensure no increase in peak flows in Ropes Creek. The SCA supports this approach to minimise flooding in streams that cross the pipeline corridor and requests that any approval of this development include an appropriate condition requiring post development stormwater flows to match pre-development stormwater flows.

The SCA notes vehicular access to this development will initially be restricted to the existing Old Wallgrove Road, which has limited capacity (only 2 road lanes) and the road corridor is not sufficiently wide to accommodate 4 lanes. Old Wallgrove Road crosses the Warragamba-Prospect Pipelines at a point where they are underground.

Future access will depend on the construction of a regional link road network. The SCA has previously raised concerns with the Dept of Planning regarding proposed further road crossing over the pipelines, but there has been no response to date.

The SCA would appreciate being involved in any further environmental assessment and consultation process associated with the application and the opportunity to comment on any draft conditions.

If you wish to discuss any matter raised in this letter please do not hesitate to contact Neil Abraham on ph 4724 2456 or via e-mail neil.abraham@sca.nsw.gov.au or Dr Bob Banens on 4724 2458 or via e-mail robert.banens@sca.nsw.gov.au.

Yours sincerely



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A/Senior Manager, Sustainability

24/3/11