

13 May 2021

Contact: *Justine Clarke*  
Telephone: *0457 535 955*  
Our ref: *D2021/55331*

Bianca Thornton  
Industry Assessments  
Department of Planning, Industry & Environment  
4 Parramatta Square  
12 Darcy Street  
PARRAMATTA NSW 2150

Dear Ms Thornton

**Kemps Creek Industrial Estate MOD 1 (SSD-9522) – Modification of the site layout to accommodate changes to Lots 5-8**

Thank you for your Major Project Portal referral dated 28 April 2021, inviting WaterNSW to provide comments on modification 1 for SSD-9522.

WaterNSW understands the modification seeks approval for:

- Modification to Stage 1 subdivision plan, including increasing site area on lot 1;
- Amendments to Stage 2 subdivision plan; and
- Amendments to the site Masterplan, including an increase in Gross Floor Area (GFA).

This site is of particular interest to WaterNSW as we own and manage the Warragamba Pipelines, which are critical water supply infrastructure, located along the northern boundary of the development site. As such, it is essential that appropriate mitigation measures are incorporated into the design to ensure State assets are protected. It is recognised that the majority of changes proposed are not located along the mutual property boundary.

WaterNSW has reviewed the application and provides the following comments.

***Increased imperviousness***

The current MOD proposes an increase in overall GFA across the site from 162,355 m<sup>2</sup> to 186,123 m<sup>2</sup>. WaterNSW considers that the request to increase the GFA has not been adequately justified, especially the potential for impact associated with the increased runoff volumes from impervious land surfaces. The MOD planning report (p. 49) identifies that stormwater detention and water quality measures will be addressed in future DAs, however WaterNSW require these impacts to be considered at this stage, as it is unmanaged stormwater runoff from increased impervious areas that poses a significant risk to our downstream infrastructure. As such, further justification is required.

WaterNSW also reiterates its requirement (provided for parent SSD-9522 approval) that:

- *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, 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.*

Further, WaterNSW questions the use of the Australian Rainfall and Runoff (ARR) (1988 Edition) for runoff and stormwater management (as indicated in Appendix 9 – Costin Roe). Australian

Rainfall and Runoff is a practitioner's principal guide to hydrology and hydraulic estimation in Australia, with two updated editions (2016; 2019) providing a significant update of techniques and base information from the 1988 edition. WaterNSW requests justification as to why the most current version of ARR was not used in this application, and for the proponent to identify any differences in the current design with those requirements of ARR 2019.

### **Consultation**

WaterNSW would like to identify that it did not receive any request for initial comment from the proponent, prior to the request from the department. WaterNSW affirms the need for on-going consultation throughout the development of the Estate, specifically in relation the road and drainage work within and adjoining the Pipelines corridor, to ensure timely advice can be provided back to the proponent for early incorporation into planning and design.

### **SSD9-522 approval**

In general, WaterNSW is satisfied that the existing approval for SSD-9522 includes consent conditions to mitigate any identified impact on the Warragamba Pipelines Corridor. Any subsequent conditions for MOD 1 should include requirements to address any increased runoff and additional stormwater management measures, if required, based on the proponents submissions response.

WaterNSW requests the Department continue to consult with us on proposals that have the potential to impact on WaterNSW land, assets and infrastructure. All correspondence should be sent using the email address [Environmental.Assessments@waternsw.com.au](mailto:Environmental.Assessments@waternsw.com.au).

If you have any questions regarding this letter, please contact Justine Clarke at [justine.clarke@waternsw.com.au](mailto:justine.clarke@waternsw.com.au).

Yours sincerely



**CLAY PRESRAW**  
**Manager Catchment Protection**