

24 August 2020

Shaun Williams  
Planning Officer  
Industry Assessments  
Department of Planning, Industry and Environment  
Locked Bag 5022  
PARRAMATTA NSW 2124

Dear Mr Williams

**Water NSW response to Exhibition of Environmental Impact Statement (EIS) – New Berrima Brick Factory (SSD 10422)**

WaterNSW appreciates the opportunity to respond to the EIS for the proposed New Berrima Brickworks Facility (SSD 10422).

WaterNSW has considered the EIS prepared by Willow Tree Environmental Planning (dated July 2020) along with relevant appendices including site and architectural plans, construction stage soil and water management, stormwater management and stormwater quality treatment measures and associated modelling.

Water NSW considers that the proposed new Berrima brickworks facility can achieve a neutral or beneficial effect (NorBE) on water quality provided:

- adequate erosion and sediment control measures are installed and maintained during the construction phase of the project, and
- proposed stormwater quality treatment measures are implemented and maintained in accordance with the manufacturer's specifications throughout the operational life of the brickworks.

Due to the extensive cut and fill and diversion of an upslope gully required as part of the development, WaterNSW considers a comprehensive and progressive staged Soil and Water Management Plan (SWMP) is necessary for the construction phase of the project. The SWMP must be prepared in consultation with WaterNSW prior to the issue of a Construction Certificate.

Water NSW notes that a large hardstand area (nearly 10 hectares) is proposed and proprietary stormwater treatment devices are required, which would involve regular maintenance to achieve water quality targets. Consequently, Water NSW would like to continue to be a stakeholder in the post-approval phase, including in the review of detailed stormwater management plans, the stormwater management monitoring program and ongoing monitoring results of the proprietary stormwater treatment devices.

Water NSW considers that a requirement for an Operational Environmental Management Plan should be included as a condition of approval. The Plan must:

- provide details of stormwater management and treatment measures, and their locations
- include detailed stormwater management monitoring program and inspection and maintenance frequency
- outline roles and responsibilities for monitoring and maintenance, and
- measures in the event of a water quality emergency to prevent and minimise the extent of any water pollution.

The Plan must be prepared prior to the commissioning of the stormwater quality treatment devices and in consultation with WaterNSW.

If you wish to discuss this letter or the project more generally, please do not hesitate to contact Miles Ellis on 9865 2502 or e-mail at [environmental.assessments@waternsw.com.au](mailto:environmental.assessments@waternsw.com.au).

Yours sincerely

A handwritten signature in black ink that reads "Clay Preshaw". The signature is written in a cursive, flowing style.

**CLAY PRESHAW**  
**Manager Catchment Protection**