

16 September 2020

Contact: *Justine Clarke*
Telephone: *02 9865 2402*
Our ref: *D2020/100848*

Jonathan Kerr
Industry Assessments
Department of Planning, Industry & Environment
4 Parramatta Square, 12 Darcy St
Parramatta NSW 2150

Dear Mr Kerr

SSI-10048 - Sydney International Speedway

Thank you for your portal referral dated 19 August 2020, and the opportunity for WaterNSW to provide input on State Significant Infrastructure project SSI-10048. WaterNSW understands the project is for the relocation of speedway racing to Western Sydney Parklands Precinct 5: Eastern Creek Motor Sports, and that the project will include:

- construction, including enabling and temporary works, earthworks and land forming activities, construction of project infrastructure, environmental management measures, utilities connections, landscaping and finishing works, and
- operation, including ancillary infrastructure required to support the speedway.

The subject site directly adjoins the WaterNSW owned and managed Warragamba to Prospect Pipelines Controlled Area (Pipelines corridor), which forms the southern boundary of the development site. In addition, the development site lies approximately 150m from Prospect Reservoir and is bounded by the Prospect Special Area to the east.

All WaterNSW lands contain critical water supply infrastructure, transporting raw water to the Prospect water filtration plant. This water supply infrastructure is an integral component of Sydney's drinking water supply system and it is essential this water supply infrastructure is protected from the potential impacts of development.

WaterNSW has reviewed the Environmental Impact Statement (EIS) and associated documents submitted by the applicant and provides the following comments for your consideration.

Impacts on Bulk Water Supply infrastructure

Developments, especially major construction projects, have the potential to impact on the integrity of the bulk water supply infrastructure. These impacts include changes in drainage and stormwater, that may increase flooding and waterlogging, surface erosion and direct damage to the infrastructure supporting the pipelines. Therefore, WaterNSW cannot accept any changes to current ground conditions or hydrology at the interface between WaterNSW lands and the proposed development.

WaterNSW is specifically concerned with the potential for overland flows from Lot 1 DP 1077822 at the proposed permanent stockpile location to enter the Pipelines corridor. The project EIS (p. 201), states that "*in the unlikely event that water does flow into the Warragamba Pipeline corridor, it would not be able to enter the pipeline itself and there would be no potential for the water quality inside to be impacted*". While this statement is true, the potential for indirect impact to WaterNSW's ability to access and maintain the Pipelines corridor is significantly increased.

WaterNSW has been provided with indicative plans for the permanent stockpile, and while the plans are not specifically indicated in the EIS, WaterNSW acknowledges and supports the five (5) metre buffer between the stockpile and the property boundary. However, WaterNSW requests additional consideration be afforded to overland flows off the stockpile. It is requested that a swale drain be installed to capture and direct flows away from the Pipelines corridor.

Requested condition:

- *At minimum, a swale or catch drain must be installed on the southern side of the permanent stockpile, located on Lot 1 DP 1077822 to collect any surface water runoff and direct it away from the WaterNSW Warragamba Pipelines Corridor.*

Water quality and quantity

The management of water during and after construction of any new development adjacent to the Warragamba Pipelines corridors is a major consideration for WaterNSW. WaterNSW advises that at this location, both WaterNSW lands and neighbouring properties are specifically prone to prolonged inundation due to proximity to Eastern Creek. Overland flows after rain events impede access to bulk water supply infrastructure for maintenance and operation, which includes the exercising of scour valves.

In addition, there are a number of points along the WaterNSW property boundary with Lot 1 DP 1077822 where overland flows are directed across and under the Pipelines corridor. Therefore, it is critical that stormwater directed across or under the Pipelines corridor or water released from scour valves is not impeded in any way by the development.

Requested conditions:

- *The final levels and design of the proposal must not result in an increase in overland flow 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.*
- *Stormwater directed to or across the Pipelines corridor is not acceptable, except at an approved point of discharge for the development.*
- *Surface water off the Pipelines corridor, including from exercising the scour valves, shall not be impeded and shall be accommodated in downstream water management systems within the development site.*

Air Quality

WaterNSW support the development and implementation of air quality management plans for the construction and operation of the project. This plan should consider the potential impacts to the open waters of the Prospect Reservoir, where dust and other particulates have the potential to settle on the surface of the water body.

Erosion and sediment control

The permanent stockpile to be located on Lot 1 DP 1077822, between Ferrers Road and the Warragamba Pipelines, could result in temporary movement of soils by wind and/or stormwater into receiving waterways and the Pipelines corridor. WaterNSW requests that effective erosion and sediment controls be installed prior to any earthworks, to ensure no soils leave the site. These controls should be regularly maintained and retained until works have been completed and the ground surface stabilised or ground cover re-established.

Requested condition:

- *The permanent stockpile to be located on Lot 1 DP 1077822 must be designed to provide adequate stabilisation of material.*
- *Effective erosion and sediment controls shall be installed prior to construction and shall be regularly maintained and retained until works have been completed and the ground surface stabilised or groundcover re-established.*

- *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.*

WaterNSW access

Vehicle access for WaterNSW must be retained in order to maintain the pipelines and service the corridor. All adjacent works must not inhibit WaterNSW from undertaking its function to supply drinking water to Sydney. All development related activities must be designed, constructed and operated in such a way that does not restrict WaterNSW from operating and maintaining 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.*
- *Any damage to the Controlled Area and or associated infrastructure caused at any stage by the shall be repaired by the consent holder, or shall pay all reasonable costs associated with repairing the damaged water supply infrastructure, in a timely manner and to the satisfaction of 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 the Department continues to consult with us regarding proposals on land adjacent to and impacting on WaterNSW infrastructure, land or assets due to the potential for impact on water quality and water supply. 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



CLAY PRESRAW
Manager Catchment Protection