16 October 2017

Director Infrastructure Projects
Planning Services
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Reference: WestConnex M4-M5 Link – SSI 7485

Thank you for the opportunity to review and comment on the Environmental Impact Statement for the proposed Stage 3 WestConnex M4-M5 Link Project. The following are our comments.

Sydney Water wastewater and potable water assets

- Sydney Water owns and operates trunk and reticulation assets located within and adjacent to the project boundary for the proposed Stage 3 WestConnex M4-M5 Link Project. These assets provide wastewater and potable water services to our customers in the affected area. Sydney Water must continue to provide these services during and post project works for the Stage 3 WestConnex M4-M5 Link Project as per Sydney Water Operating Licence and regulatory requirements . These assets include (but are not limited to) the City and Pressure Tunnels, Balmain Slopes Submain at Iron Cove and Sewage Pumping Station (SP0006) at Easton Park.

- Sydney Water encourages the contractor for these works to conduct early consultation and discussions with Sydney Water. We also recommend that all relevant information, plans and needs specifications for these assets are requested from Sydney Water.

- The Environmental Impact Statement provides a figure for potable water use within and for the project. The availability and volume of these flows will depend on system capability and will be confirmed during detail design.

- Sydney Water reserves the right to assess, based on final project layout and construction designs prepared by the project team and or their contractors, the impacts on our assets located within the project scope, and the potential needs for adjustments funded by the project to accommodate accessibility of our pipes for operational and maintenance purposes, new pavement locations and changes to structures.

- Sydney Water requires safe unrestricted access to our assets throughout the life of the project. We need to ensure these assets are fully operational at all times.

- Sydney Water recommends early consideration of staging and timing design for work and delivery of the project. This is very **critical** to allow sufficient time for Sydney Water to schedule and program shutdowns and reconnections of our assets. This will ensure that Sydney Water continues to meet its Operating Licence and most importantly maintain services to our customers. A Water Service Coordinator can assist you with this process.

- Sydney Water Asset Adjustment process, found on the Sydney Water website, should be adhered to for the relocation, adjustment and/or protection of our assets. Additionally, if assets are required to be changed, the environmental approval will need to cover any works identified that may fall outside of the project boundary, but be a result of the project works.

- Any trade waste licence request, most notably for removal of leachate, will need to meet Sydney Water's requirements.

- The environmental approval needs to meet the discharge protocols of chlorinated water due to watermain shutdown and reconnection of live Sydney Water assets that will need to be adjusted.

- Consultation with Sydney Water is required early to ensure any amplifications are identified, planned and confirmed early in the process. Amplification of assets may be required to facilitate future growth along the development corridor. This will be assessed as adjustment applications are referred to Sydney Water for review..

- Volume 2B Section 1.7.1 NSW Legislation – please add **Sydney Water Act 1994**.

- Volume 2B Section 2.3 **Major Utility Services** includes

    - Potable Water (Sydney Water) – mains of 250millimetre diameter or greater
    - Wastewater (Sydney Water) – pipes greater than 300millietre diameter
    - Stormwater (Sydney Water) – mains of 375millimetre diameter or greater including, culverts and open channels

- Volume 2B Section 3.8.1 **Sydney Water Utility Services**

  Amend the statement "it is expected the Sydney Water assets would not be adversely impacted" to "it is expected the Sydney Water assets should not be adversely impacted". There is currently no detailed assessment that confirms the assets would not be adversely impacted by the Main Line tunnel.

  Amend "It is expected that the potential vibration and settlement impacts on these utility services would be negligible and can be managed" to "Potential vibration and settlement impacts on the City and Pressure tunnels are not yet determined until

further assessments are conducted. Once determined, suitable control measures must be implemented to minimise vibration and settlement impacts."

Sydney Water stormwater assets

- Overall the approach to managing surface water impacts of the project is sound. Close consultation with Sydney Water during the concept & detailed design, construction and operational phases of the project will be required to ensure that the objectives are met and that the impacts to Sydney Water stormwater assets is minimised, or improvements to the receiving environment can be achieved.

- Sydney Water requests that the project designers consider the project in the context of the broader catchment and likely long-term flood mitigation service requirements. Any stormwater infrastructure should also be designed in a way that enhances biodiversity, aesthetics and social amenity whilst also achieving flood mitigation and water quality objectives.

- There may be opportunities to irrigate surrounding open spaces with broader catchment stormwater and tunnel water. This could go a significant way to helping the project achieve its water quality commitments whilst also reducing potable water demands and providing more liveable open space outcomes for the community.

- We commend the EIS position aiming to achieve best practice outcomes for the entire project. We also support adoption of the NSW Water Quality Objectives, ANZECC Water Quality Guidelines, Sydney Harbour and Botany Bay Water Quality Improvement Plans.

  However, the EIS advises that the stormwater mean annual pollutant load reduction targets would not be achieved for the project or for the individual catchments, based on the treatment measures that could practically or readily be implemented. Table 15-12 'MUSIC modelling results for operational water quality' shows that the project fails to meet 20 out of 25 pollutant reduction targets. Sydney Water is concerned that even at this early stage of project design development there appears to be a lack of application by the project to meet suitable targets.

- In view of the substantial annual volumes of groundwater delivered to the two concentrated outlets (Darley Road – Hawthorne Canal and Rozelle – proposed wetland), there is a potential for unsuitable quality groundwater to overwhelm benefits associated with current and future catchment wide stormwater management / treatment efforts by Sydney Water and Councils for these locations.

  Sydney Water requests that the establishment of appropriate tunnel water discharge treatment targets be reviewed and determined by a suitable independent expert and that the project designers apply a high degree of verifiable effort to meet the targets.

- Sydney Water's stormwater quality targets will apply when a connection to our asset is required (Refer to Sydney Water's website http://www.sydneywater.com.au/SW/water-the-environment/how-we-manage-sydney-s-water/stormwater-network/stormwater-quality-targets/index.htm).

- Stormwater quality monitoring results for stormwater discharges should be provided to Sydney Water throughout including pre, during and post construction of the road (3 years).

- Works around the Rozelle Railyard will require heritage and environmental safeguards, which are site specific and may not be currently covered by the conservation management plan for the canal. Sydney Water must be included in the consultation with the Environmental Protection Authority and WestConnex on this issue.

- Continual communication with Sydney Water regarding the detailed design and flood assessment will be required. Any weakening of the EIS position during detailed design will be critically examined by Sydney Water.

Utilities Management Strategy

- Sydney water endorses this strategy to work together with all utilities involved in this project throughout detailed design and construction phases to ensure protection of all utilities assets. This is referenced in the Utility Management Strategy (Volume 2B, Appendix F)
- Also create a clash register which can prioritise high to low risk assets.

Sydney Water recommends continued meetings to discuss designs and constraints will benefit the project. Please contact me on 8849 5207 for further information and to discuss any questions.

Yours sincerely

Fernando Ortega
Account Manager, Development Partnerships