

1st December 2020

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Reference: SSI-10051 Sydney Metro – Western Sydney Airport

Thank you for the opportunity to review and comment on the Environmental Impact Statement for the proposed Sydney Metro railway line at the future Western Sydney Airport. The following comments have been made in response to the Environmental Impact Statement.

The proponent must obtain endorsement and/or approval from Sydney Water to ensure that the proposed project does not adversely impact on any existing water, wastewater or stormwater assets, or other Sydney Water asset, including any easement or property.

Sydney Water wastewater and potable water assets

- Sydney Water owns and operates trunk and reticulation assets located within and outside the project boundary for the proposed Sydney Metro project. These assets provide wastewater and potable water services to our customers in the affected area.
- Sydney Water, during and post works of the Sydney Metro Project, must continue to provide these services as per Sydney Water's Operating Licence and regulatory requirements.
- Sydney Water encourages early consultation and discussions with Sydney Metro for these works. We also recommend that all relevant information, plans, needs specifications for these assets are requested from Sydney Water.
- The Environmental Impact Statement states that it must seek to minimise the use of potable water and if potable water usage is required targets will be set to monitor potable water use. 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 for staging and timing design 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 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 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.
- 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. Sydney Water consultation is required early to ensure any amplifications are identified, planned and confirmed early.
- Chapter 4.1: *Planning and Statutory Requirements* – please add **Sydney Water Act 1994**.
- Chapter 8 Project Description – Construction: Section 8.9.11 – *Utility Protection, Adjustment and Relocation* – the proponent **must** consult with and **obtain approval** from Sydney Water before commencement of works.

Sydney Water stormwater assets

- Close consultation with Sydney Water during the concept & detailed design, construction and operational phases of the project must 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.
- Strict requirements for Sydney Water's stormwater assets apply to this project. Sydney Metro should ensure that satisfactory steps/measures been taken to protect existing stormwater assets, such as avoiding building over and/or adjacent to stormwater assets and building bridges over stormwater assets. Sydney Metro should consider taking measures to minimise or eliminate potential flooding, degradation of water quality, and avoid adverse impacts on any heritage items, and create pipeline easements where required.

Soils and Contamination

- For impacts on the any Sydney Water waterways sediments compliance with the NSW EPA's Remediation Order is required.

- Sydney Water would like further information on future action Sydney Water would take if tests indicate existence of contamination in groundwater.
- The construction of the proposed Western Sydney Airport will undertake dramatic earthworks which are likely to establish significant catchment runoff redirections. While this may reduce flood impacts to some waterway's others would experience increased impacts. The detail of this need to be better understood and the equity issues for landholders addressed.
- The assessment of runoff from development areas focuses principally on runoff water quality. Runoff impacts should be better evaluated against the DPIE Risk Based Assessment Framework which would identify mean annual runoff volume from impervious surfaces (and other catchment hydrology characteristics) as crucially important in terms of receiving water health and stability. The project impact assessment and mitigation proposals need to be better formulated in this context.

Groundwater

- Sydney Water recommends that pump out is intended for local treatment (high salinity and heavy metals prevalent) and reuse. However, the commitment to this approach is weak and direct discharge of groundwater to local waterways is identified. The relative split between these is not well quantified. Continuous or regular discharge of groundwater or detained runoff to local waterways, particularly ephemeral creeks is fraught and this aspect should also be evaluated against the DPIE framework. The evaluation should reflect not just the existing nature of degraded local waterways but a vision for community aspirational rehabilitated and naturally functioning waterways.

Biodiversity

- The proposal indicates that there will be proposed culverts and crossings within creek catchments. Further details of methodologies around proposed construction of any culverts and crossings must be raised with Sydney Water to identify any risks that may adversely affect local biodiversity and water catchments.

Flooding

- The assessment of flood impacts is not established within a broader South Creek catchment context. This has been an issue of ongoing and as yet unresolved issue between Sydney Water, Council and the planning authorities. This is a fundamental weakness in the ongoing regional flood management planning. We request, as a matter of urgency, that the responsible planning authority address this gap and evaluate the cumulative impacts of existing and anticipated development in South Creek in such a context. Flood impact assessments that substantially 'stop at the front door' do not present a responsible planning context for the assessment of flood impacts associated with these projects.

Land Use and Property

- The proposed Sydney Metro railway line at the future Western Sydney Airport needs to demonstrate compliance with the new waterway health objectives for flow and

quality developed by Department of Planning, Industry, and Environment for the Wianamatta catchment in order to align with the state Governments Risk Based Framework for considering waterway health outcomes in Strategic land-use Planning Decisions.

Piling adjacent to Sydney Water assets

- It is recommended that further work is required to inform assessment of the impact of the proposed Sydney Metro railway line at the future Western Sydney Airport especially the bridges on Sydney Water assets. Such may include (not necessarily comprehensive) the following:
 - Detailed geotechnical investigations;
 - Settlement and ground movement predictions from various activities (piling, excavating, fill embankments, etc.) that may impact Sydney Water assets;
 - Dilapidation surveys of Sydney Water assets, and
 - Vibration limits and trigger levels

Overall, Sydney Water strongly recommends continued consultations with Sydney Metro to discuss designs and constraints which will benefit the project.

Please contact me on 043268 0177 for further information and to discuss any question

Yours sincerely,



Arthur Andronopoulos
Account Manager – Sydney Metro
Infrastructure Development