20 December 2022 Our Ref: 191544

David Schwebel
Senior Planning Officer
Industry Assessments
Department of Planning Industry and Environment
4 Parramatta Square, Parramatta, NSW 2124
David.schwebel@planning.nsw.gov.au

RE: SSD-9138102 Westlink Industrial Estate at 290-308 Aldington Road, 59-62 Abbotts Road & 63 Abbotts Road, Kemps Creek

Thank you for notifying Sydney Water of SSD-9138102 Westlink Industrial Estate at 290-308 Aldington Road, 59-62 Abbotts Road & 63 Abbotts Road, Kemps Creek, which proposes amendments to the initial proposal which Sydney Water responded to on 06/08/2021 (copy attached). These amendments include:

- Reduction in the number of subdivided lots from 5 to 4.
- Reduction in the number of proposed industrial warehouses from 6 to 2, with the remainder of the industrial allotments to be facilitated through subsequent development applications.
- Minor adjustments to the size and orientation of the remaining proposed warehouses (Warehouses 1 and 4 respectively).
- Deletion of proposed retail café (which will now form part of a future DA).
- Associated reduction in GFA and parking to reflect the revised number of proposed allotments and warehouses.

This development is located within the Mamre Road precinct. Sydney Water's water and wastewater servicing requirements for this proposed development are provided under the Anticipated Notice of Requirements for the Section 73 application that the proponent has already lodged with us – CN 191544 and any future or linked cases.

Due to the uploaded *Amendments Reports* proposal modifications that will affect the issued Anticipated Notice of Requirements under CN191544, the Proponent should contact their case manager and discuss any potential additional servicing requirements under the ANOR.

Stormwater
Sydney Water provides updated stormwater advice (below) following nomination as the stormwater authority and in line with the revised proposal.

Adherence to Sydney Water's Stormwater Scheme Plan
Sydney Water acknowledges the inclusion of temporary stormwater quality and volume management infrastructure and notes that this infrastructure will not be required once the development is connected to the *regional scheme infrastructure*. At this point any temporary stormwater management infrastructure, including rainwater harvesting tanks, will be required to be decommissioned/disconnected and the development connected to the purple pipe recycled water reticulation system.

- For Sydney Water to accept any connections to the *regional stormwater scheme* the development must demonstrate the following implementations:
    - Documentation must clearly demonstrate that the mandatory 15% pervious area has been provided for the ultimate state of the development.
    - Adequately sized and SQIDEP approved gross pollutant traps are installed across the development; and
    - Passively irrigated trees, which will act as a stormwater retention device as part of the regional stormwater infrastructure strategy and help to achieve government canopy targets and urban cooling are laid along all roads within the development. Street trees are to be delivered as per Sydney Water guidance and nominally spaced at 8m centres.

Waterway Health Targets

- Sydney Water requires a more detailed water and stormwater management plan that outlines both interim and ultimate compliance with the DCP stormwater targets and is consistent with the Technical Guidance for achieving Wianamata-South Creek stormwater management targets.
- This plan should contain:
    - All natural and proposed catchments (including those upstream of the Westlink Industrial Estate development boundary) and land use splits (including areas/percentage impervious).
    - Drainage locations and any proposed flow diversions, including required open natural trunk drainage as outlined below.
    - Any temporary WSUD systems.
    - Proposed irrigation areas for temporary tanks and ponds.
    - Please note that roof misting/watering will not be accepted as part of any interim or ultimate solutions at this stage.

Trunk Drainage

As the nominated Stormwater Authority for Mamre Road, Sydney Water has planned trunk water drainage infrastructure, which was published in the Mamre Road DCP and included in Sydney Water's mid 2022 draft Stormwater Scheme Plan. Please note that the next update is anticipated to be published on 21/12/2022.

The diagrams below provide information pertaining to the above site in relation to the Mamre DCP the Draft Sydney Water Stormwater scheme plan and current trunk requirements:

Diagram 1: Site location and Mamre DCP identified drainage infrastructure

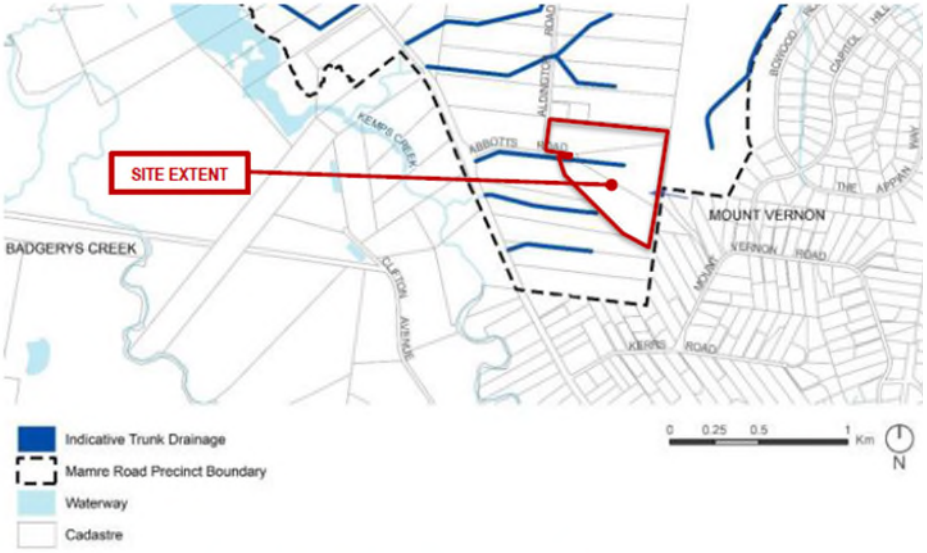


Figure 14: Trunk drainage infrastructure identified in the Mamre Road Precinct DCP

Diagram 2: Relevant excerpt from December 2022 update of Sydney Water's Stormwater Scheme Plan part 1.

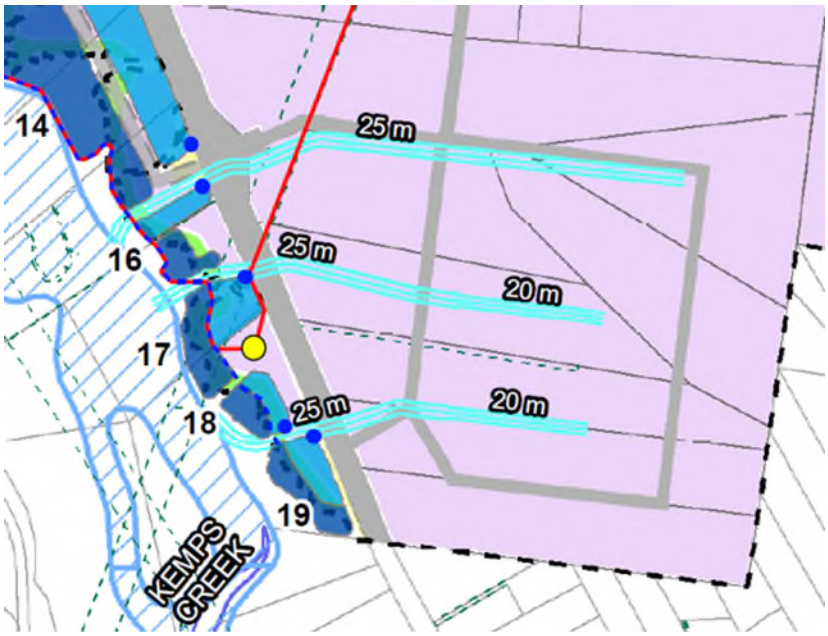
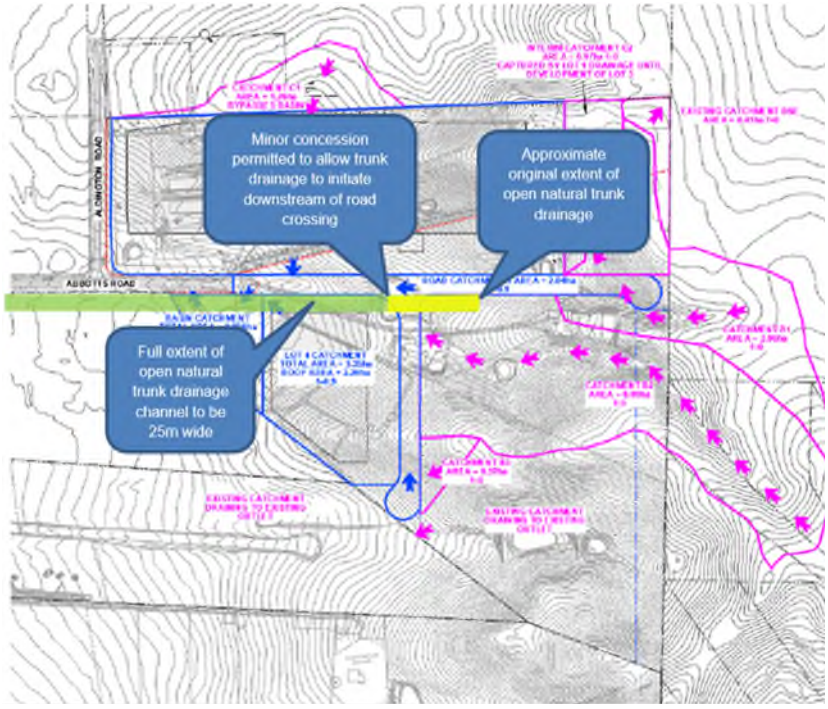


Diagram 3: Relevant excerpt from December 2022 update of Sydney Water's Stormwater Scheme Plan part 2.



Sydney Water will permit a minor reduction in the planned open natural trunk drainage channel extent to allow the open channel to initiate downstream of the proposed internal (North/South) road.

- The open natural trunk drainage channel within the site, which has been identified by Sydney Water and the Proponent (as above) and which will be managed by Sydney Water *must* be reflected in the Proposal. Right of access will be required to allow Sydney Water to manage and maintain the asset in perpetuity.
- The trunk drainage channel will be assessed in relation to standards set out in Sydney Water's *Stormwater Scheme Infrastructure Technical Guidelines DRAFT* (to be provided in December 2022).
- In advance of the *Stormwater Scheme Infrastructure Technical Guidelines* DRAFT, the following advice is provided:
    - The low flow channel must be sized to contain the 4EY.
    - Batter slopes should be between 1:4-1:6 wherever feasible, localised steepening of banks with appropriate surface treatment to protect from shear stress and velocity will be accepted to facilitate low flow channel base meander.
    - Sydney Water requires a compound waterway form wherever possible to assist in provision of low flow channel sinuosity.
- Typical longitudinal grading of the trunk drainage should be in the range of 0.4% - 0.8% with an upper limit of 1.4%. Shear force calculations are to be provided for low flows, 1% and 10% AEP flows and demonstration of appropriate surface treatment to protect from erosion. This is particularly important at the entry and exit of the major bends.

- Part of the function of the naturalised trunk drainage channels is to provide amenity and access to natural, green cool space within the precincts. It is recommended to consider safe access to the perimeters of the corridor. Access shall be provided as described in the *Stormwater Scheme Infrastructure Technical Guidelines* DRAFT.
- Sydney Water will not accept private OSD or interim stormwater retention storage in the naturalised trunk drainage channel. The proposal currently has an OSD basin shown where the trunk drainage channel is required. **This will need to be amended.**
- Sydney Water encourages a robust local native planting palette that enhances the ecological value of the site, balanced with considerations of not increasing attraction of wildlife that may be problematic to airport operations. See *Stormwater Scheme Infrastructure Technical Guidelines* DRAFT.
- Documentation must also be provided to demonstrate that the selected planting plan will facilitate flood conveyance appropriately at establishment and full maturity. See *Stormwater Scheme Infrastructure Technical Guidelines* DRAFT for appropriate Manning's 'n' values to test.

Floor Impact Assessments

The following is noted regarding floor impact assessments and next steps required in this area:

- The hydrology base model should adopt the same loss model as the adopted Wianamatta South Creek model.
- The undeveloped case 50% AEP flood model shall be mapped to confirm upstream and downstream inflow and outflow points. These points shall be used to assess if the proposed development is maintaining status quo for developed flows. Peak flows shall be extracted at these points for comparison to developed flows. However, there are inconsistencies between the 2 hydrologic models including catchment naming making it difficult to assess the discretisation of the models
- An impervious percentage of 90% was quoted in the modelling, this is contrary to the controls in the DCP requiring a maximum of 85% for a development site.
- The scenarios in Appendix B need to be clearly labelled and defined to better inform the discussion.
- Mapping shows flood level increases on downstream properties post development. This is not acceptable and will require either written acceptance from the downstream property owner(s) or additional attenuation of flows leaving the developed site.
- The flowrates shown in the flood assessment appear lower than the flowrates considered in Sydney Water's scheme plan assessment. Regarding this, the proponent is required to provide the parameters utilised in the hydrologic modelling for the site. This shall include full consistent catchment mapping, adopted loss rates, flow path lengths and locations, and adopted rainfall information. This can be provided as a spreadsheet of the input data for the XP-Rafts model with appropriate sketches. Additional guidance on appropriate hydrologic and hydraulic modelling will be provided in the *Stormwater Scheme Infrastructure Technical Guidelines DRAFT* (to be provided in December 2022).
- It is noted that in the Civil and Stormwater Management Strategy, the design of the pit and pipe network limits the velocity depth product of bypass flows to 0.4m2/s. This should be amended to align with ARR2019's recommendations which vary from 0.2m2/s to 0.3m2/s for the safety of small vehicles.
- The basin will require fencing as the peak depth is over 4 m. The basin shall remain in the care and control of ESR Westlink or their agents and be regularly maintained. Any

downstream erosion caused by the basin operation shall be repaired by ESR Westlink or their agents.

- Full details of the OSD basin design is to be provided to ensure that it will effectively interface with the trunk drainage channel.

This advice is not formal approval of our servicing requirements. Detailed requirements, including any potential extensions or amplifications, will be provided once the development is referred to Sydney Water for a Section 73 application. More information about the Section 73 application process is available on our web page in the Land Development Manual.

Further advice and requirements for this proposal are in Attachments 1 & 2. If you require any further information, please contact the Growth Planning Team at urbangrowth@sydneywater.com.au. The proponent should contact their Sydney Water Account Manager for further information.

Yours sincerely,

Kristine Leitch
Commercial Growth Manager
City Growth and Development, Business Development Group
Sydney Water, 1 Smith Street, Parramatta NSW 2150

Attachment 1

Section 73 Compliance Certificate

A Section 73 Compliance Certificate under the Sydney Water Act 1994 must be obtained from Sydney Water.

The proponent is advised to make an early application for the certificate, as there may be water and wastewater pipes to be built that can take some time. This can also impact on other services and buildings, driveways, or landscape designs.

Applications must be made through an authorised Water Servicing Coordinator. For help either visit www.sydneywater.com.au > Plumbing, building, and developing > Developing > Land development or telephone 13 20 92.

Building Plan Approval

The approved plans must be submitted to the Sydney Water Tap in™ online service to determine whether the development will affect any Sydney Water sewer or water main, stormwater drains and/or easement, and if further requirements need to be met.

The Tap in™ service provides 24/7 access to a range of services, including:

- building plan approvals
- connection and disconnection approvals
- diagrams
- trade waste approvals
- pressure information
- water meter installations
- pressure boosting and pump approvals
- changes to an existing service or asset, e.g., relocating or moving an asset.

Sydney Water's Tap in™ online service is available at: https://www.sydneywater.com.au/SW/plumbing-building-developing/building/sydney-water-tap-in/index.htm

Sydney Water recommends developers apply for Building Plan approval early as in some instances the initial assessment will identify that an Out-of-Scope Building Plan Approval will be required.

Out of Scope Building Plan Approval

Sydney Water will need to undertake a detailed review of building plans:

1. That affect or are likely to affect any of the following:
   - Wastewater pipes larger than 300mm in size
   - Pressure wastewater pipes
   - Drinking water or recycled water pipes
   - Our property boundary
   - An easement in our favour
   - Stormwater infrastructure within 10m of the property boundary.

2. Where the building plan includes:
   - Construction of a retaining wall over, or within the zone of influence of our assets
   - Excavation of a basement or building over, or adjacent to, one of our assets
   - Dewatering – removing water from solid material or soil.

The detailed review is to ensure that:

- our assets will not be damaged during, or because of the construction of the development
- we can access our assets for operation and maintenance
- your building will be protected if we need to work on our assets in the future.

The developer will be required to pay Sydney Water for the costs associated with the detailed review.

Tree Planting

Certain tree species placed in close proximity to Sydney Water's underground assets have the potential to inflict damage through invasive root penetration and soil destabilisation. Sydney Water requires that all proposed or removed trees and vegetation included within the proposal adhere to the specifications and requirements within Section 46 of the Sydney Water Act (1994) and *Diagram 5 – Planting Trees* within our Technical guidelines – Building over and adjacent to pipe assets. Please note these guidelines include more examples of potential activities impacting our assets which may also apply to your development.

If any tree planting proposed breaches our policy, Sydney Water may need to issue an order to remove every tree breaching the act, or directly remove every tree breaching the Act and bill the developer or Council for their removal.

Attachment 2

Requirements for **Business Customers for Commercial and Industrial Property Developments.**

Trade Wastewater Requirements

If this development is going to generate trade wastewater, the property owner must submit an application requesting permission to discharge trade wastewater to Sydney Water's sewerage system. You must obtain Sydney Water approval for this permit before any business activities can commence. It is illegal to discharge Trade Wastewater into the Sydney Water sewerage system without permission.

The permit application should be emailed to Sydney Water's Business Customer Services at businesscustomers@sydneywater.com.au

A Boundary Trap is required for all developments that discharge trade wastewater where arrestors and special units are installed for trade wastewater pre-treatment.

If the property development is for Industrial operations, the wastewater may discharge into a sewerage area that is subject to wastewater reuse. Find out from Business Customer Services if this is applicable to your development.

Backflow Prevention Requirements

Backflow is when there is unintentional flow of water in the wrong direction from a potentially polluted source into the drinking water supply.

All properties connected to Sydney Water's supply must install a testable Backflow Prevention Containment Device appropriate to the property's hazard rating. Property with a high or medium hazard rating must have the backflow prevention containment device tested annually. Properties identified as having a low hazard rating must install a non-testable device, as a minimum.

Separate hydrant and sprinkler fire services on non-residential properties, require the installation of a testable double check detector assembly. The device is to be located at the boundary of the property.

Before you install a backflow prevention device:

1. Get your hydraulic consultant or plumber to check the available water pressure versus the property's required pressure and flow requirements.
2. Conduct a site assessment to confirm the hazard rating of the property and its services. Contact PIAS at NSW Fair Trading on 1300 889 099.

For installation you will need to engage a licensed plumber with backflow accreditation who can be found on the Sydney Water website:
https://www.sydneywater.com.au/plumbing-building-developing/plumbing/backflow-prevention.html

Water Efficiency Recommendations

Water is our most precious resource, and every customer can play a role in its conservation. By working together with Sydney Water, business customers are able to reduce their water consumption. This will help your business save money, improve productivity and protect the environment.

Some water efficiency measures that can be easily implemented in your business are:

- Install water efficiency fixtures to help increase your water efficiency, refer to WELS (Water Efficiency Labelling and Standards (WELS) Scheme, http://www.waterrating.gov.au/
- Consider installing rainwater tanks to capture rainwater runoff, and reusing it, where cost effective. Refer to https://www.sydneywater.com.au/your-business/managing-your-water-use/water-efficiency-tips.html
- Install water-monitoring devices on your meter to identify water usage patterns and leaks.
- Develop a water efficiency plan for your business.

It is cheaper to install water efficiency appliances while you are developing than retrofitting them later.

Contingency Plan Recommendations

Under Sydney Water's customer contract Sydney Water aims to provide Business Customers with a continuous supply of clean water at a minimum pressure of 15meters head at the main tap. This is equivalent to 146.8kpa or 21.29psi to meet reasonable business usage needs.

Sometimes Sydney Water may need to interrupt, postpone or limit the supply of water services to your property for maintenance or other reasons. These interruptions can be planned or unplanned.

Water supply is critical to some businesses and Sydney Water will treat vulnerable customers, such as hospitals, as a high priority.

Have you thought about a contingency plan for your business? Your Business Customer Representative will help you to develop a plan that is tailored to your business and minimises productivity losses in the event of a water service disruption.

For further information please visit the Sydney Water website at: https://www.sydneywater.com.au/your-business/managing-trade-wastewater/commercial-trade-wastewater.html or contact Business Customer Services on 1300 985 227 or businesscustomers@sydneywater.com.au.