



PO Box 323 Penrith NSW 2750  
Level 4, 2-6 Station Street  
Penrith NSW 2750  
Tel 1300 722 468 Fax 02 4725 2599  
Email [info@sca.nsw.gov.au](mailto:info@sca.nsw.gov.au)  
Website [www.sca.nsw.gov.au](http://www.sca.nsw.gov.au)

Ref: D2010/6133

Haley Rich  
Department of Planning  
GPO Box 39  
SYDNEY NSW 2001

Dear Ms Rich

**MAJOR PROJECT APPLICATION**  
**JACFIN ROPES CREEK PROJECT – Concept Plan & Concurrent Project**  
**Application for Stage 1 Warehouse and Infrastructure**  
**Application Numbers MP 10\_0127 & MP 10\_0128**

Thank you for the invitation to comment on the Environmental Assessment (EA) for the above project.

A critical item of public infrastructure, the Warragamba-Prospect Pipelines No 1 & 2, which are owned and managed by the Sydney Catchment Authority (SCA), are adjacent to the lands covered by the Jacfin Ropes Creek Project and potentially affected by the proposed development.

The SCA has a number of overall concerns in regard to developments that may impact on the integrity of the pipelines and the SCA's ability to manage them. These include:

- **Management and maintenance of the pipelines:** The SCA needs to be able to maintain vehicle access to the pipelines and service corridor to undertake all manner of operations or maintenance. Development proposals adjacent to, or crossing the pipelines may impact on the SCA's ability to safely and effectively access the pipelines for management and emergency purposes.
- **Integrity of the pipelines:** Development, especially major construction projects, potentially can have impacts on the integrity of the pipelines and service corridor. These impacts include changes in drainage and stormwater that may increase flooding, subsidence and erosion; unauthorised breaches of the corridor; and damage to the actual infrastructure of the pipelines, particularly during construction activities.
- **Security of the pipelines:** In the experience of the SCA, increased commercial, residential and transport development occurring adjacent or near to SCA's infrastructure has a direct correlation with an increased occurrence of security incidents. This includes trespass, malicious damage, rubbish dumping, arson, assault and threatening behaviour. The proximity of development can also have a detrimental impact on our ability to employ security measures of choice due to aesthetic, safety and other considerations. To counter such security risks, the SCA will incur an increase in costs as development encroaches on the pipelines, through new security works, increased patrolling and response, maintenance of new barriers, repair of damaged barriers, increased signage and lost time due to increased incident investigation.

The EA states that the Sydney Catchment Authority was consulted on 19 August 2010 and SCA's main concern relates to the pipe crossings. The EA notes Jacfin's response as: *Advised that the regional road layout has been designed to be consistent with the WSEA SEPP*. SCA has no record of any consultation with Jacfin or the authors of the EA (JBA Planning). This single matter does not represent all the issues of concern to the SCA.

The SCA has a number of specific concerns in regard to the proposed development and aspects of the Environmental Assessment. These include:

### **1. Protection of the Warragamba-Prospect Pipelines**

As Warragamba-Prospect Pipelines No 1 & 2 are critical public infrastructure for Sydney's drinking water supply, it is essential that appropriate measures are implemented to minimise the risk of damage to the pipelines and associated corridor.

The SCA requests that the following condition be included in any approval of the development:

*The Proponent shall:*

- a) ensure that the Works do not damage the Sydney Catchment Authority's water supply infrastructure or reduce the safety of the operation of the infrastructure; and*
- b) repair, or pay all reasonable costs associated with repairing Sydney Catchment Authority infrastructure that is damaged by the project; and*
- c) relocate, or pay all reasonable costs associated with relocating any infrastructure that the Sydney Catchment Authority considers needs to be relocated as a result of the project.*

### **2. Boundary fencing**

To minimise the potential for the public to access the pipelines and associated corridor, the SCA request that the following condition be included in any approval of the development:

*Security fencing for development adjacent to the Warragamba to Prospect Pipelines*

- Chain wire fencing must be erected along all common boundaries between the development and the Sydney Catchment Authority's pipeline corridor;*
- Fencing to be constructed to AS/NZS 1725:2003 – Chain-link Fabric Security Fencing and Gates, Appendix A, Type 2 T-B/B-T; and*
- Fences are to be permanent and adequately maintained*

### **3. Stormwater Management**

The EA states that stormwater drainage management will be designed so that post development 100 year ARI flows will be maintained at pre-development rates to ensure no increase in peak flows in Ropes Creek. The SCA supports this approach to minimise flooding in streams that cross the pipeline corridor and requests that any approval of this development include an appropriate condition requiring post development stormwater flows to match pre-development stormwater flows and for



the SCA to be consulted in the preparation of the Stormwater Management Plan.

#### **4. Bulk Earthworks**

The Concept Plan includes indicative plans for cut and fill earthworks. Areas of excavation are indicated along the boundary of the Pipelines corridor. The SCA requests that any approval of this development include an appropriate condition requiring the SCA to be provided with details and plans of proposed earthworks, retaining walls or other constructions along the SCA boundary before such works commence and that the SCA is advised in advance of any proposed construction activities close to the boundary of SCA lands.

#### **5. Regional Road Connections**

The Concept Plan includes a regional road running north-south through the site, consistent with SEPP (Western Sydney Employment Area) 2009. The SCA has recently advised the Department that this road alignment will create a number of problems for the SCA. Consequently the SCA has separately requested that the Department further investigate the option of crossing the Pipeline corridor further to the west.

The issues for the SCA outlined above are significant, especially as the proposed project is part of a major intensification of development adjacent to the pipelines and associated corridor.

The SCA would appreciate being involved in any further environmental assessment and consultation process associated with the application and the opportunity to comment on any draft conditions. Further, the SCA also requests that it be given the opportunity to review all plans for any construction works and fencing along the SCA's pipeline boundary prior to works commencing.

If you wish to discuss any matter raised in this letter please do not hesitate to contact Neil Abraham on ph 4725 2143 or [neil.abraham@sca.nsw.gov.au](mailto:neil.abraham@sca.nsw.gov.au), or Malcolm Hughes on 4725 2139 or [malcolm.hughes@sca.nsw.gov.au](mailto:malcolm.hughes@sca.nsw.gov.au).

Yours sincerely

 24/12/10

**GREG SHEEHY**  
**Senior Manager, Sustainability**