

12 December 2022

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Our ref: *D2022/164079*

NSW Department of Planning and Environment  
Locked Bag 5022  
Parramatta NSW 2124

Dear Sir/ Madam

**RE: Draft Greater Penrith to Eastern Creek Strategic Framework**

I refer to the exhibition of the Greater Penrith to Eastern Creek (GPEC) Draft Strategic Framework and associated strategic planning documents that set out GPEC's suitability for urban growth for the next 20-30 years and establishes associated planning priorities for the area. We understand that the GPEC area sits within both the Penrith and Blacktown LGAs and spans approximately 19,000 ha, connecting the Central River City and Western Parkland City.

WaterNSW has an interest in the Strategic Framework as the Warragamba Pipelines Corridor forms the southern boundary of the GPEC area. The Pipelines supply the majority of Sydney's water needs, conveying bulk raw water from Warragamba Dam to Prospect Water Filtration Plant. The Corridor is a declared Controlled Area under the *Water NSW Act 2014*, and public access is prohibited. The Corridor and an associated 25 m buffer area are also mapped as 'affected land' under State Environmental Planning Policy (Transport and Infrastructure) 2021, with section 2.163 requiring new development to be consistent with WaterNSW's [Guideline for Development Adjacent to the Upper Canal and Warragamba Pipelines](#) (the Guideline). The Guideline establishes the development controls and urban design necessary to protect the Corridor and Pipelines from development impacts.

It is essential that the Warragamba Pipelines Corridor and the associated bulk water supply infrastructure are considered and protected during all stages of planning and development of the GPEC. The primary purpose of the Corridor is for water and infrastructure security. It is particularly important to ensure that drainage across the Corridor into the GPEC area is not impeded, blocked or otherwise altered as this could compromise the functionality of the Corridor and increase flooding risks. These matters are addressed in more detail in the Guideline.

While the Draft Framework considers the location of the Pipelines Corridor in various maps, it does not canvass the protection of the Pipelines Corridor in the body of the document, including in specific strategies and actions. The document also includes a number of transport maps showing proposed crossing points at different locations. It is important that the maps are consistent and that the number of crossing points is kept to an absolute minimum. We also note that WaterNSW is not currently identified as a relevant Government stakeholder.

We request that the document:

- clarifies that the southern boundary of GPEC area is defined by the boundary with the WaterNSW Warragamba Pipelines Corridor (rather than the Pipelines themselves)

- includes an additional action to protect the Corridor and ensure that new strategic land use planning, transport infrastructure and development proposals adjoining or crossing the Corridor conform with the aforementioned Guideline and for proponents to consult with WaterNSW as early as possible in the planning process
- revises the transport-related maps to ensure that the proposed crossing points along the Corridor are consistent and minimised
- identifies WaterNSW as a government organisation with an interest in the GPEC given that the area borders the Pipelines Corridor in the south.

Our detailed comments are provided in Attachment 1. Should you have any questions regarding the above matters, please contact Stuart Little ([stuart.little@waterNSW.com.au](mailto:stuart.little@waterNSW.com.au)).

Yours sincerely



**DARYL GILCHIST**  
**Manager Catchment Protection**

## **ATTACHMENT 1 – WATERNSW COMMENTS**

### ***General***

We note and support the consistent and clear identification and labelling of the Warragamba-Prospect Pipeline in relevant maps (e.g. Figures 12 – 25), however the Strategic Framework does not otherwise discuss the Pipelines or the associated Corridor. Protecting the Warragamba Pipelines Corridor is particularly important in managing urban growth in the south of the GPEC area in order to maintain the security of Sydney's drinking water supply. This is not currently recognised in the Directions and Actions of the Framework.

#### ***Recommendations:***

- It is recommended that the labelling on maps to be slightly adjusted to refer to the Warragamba-Prospect Pipelines (plural) as there are two pipelines.
- An additional Action is added to the Framework: Protect the Warragamba Pipelines Corridor by ensuring that land use planning, transport infrastructure and new development within or adjoining the Corridor is consistent with WaterNSW's [\*Guideline for Development Adjacent to the Upper Canal and Warragamba Pipelines\*](#) and for WaterNSW to be consulted early in the planning process.

The action would give the WaterNSW Guideline standing under the proposed s 9.1 Ministerial Direction for the GPEC area, which requires a planning proposal authority to ensure that a planning proposal is consistent with the GPEC Strategic Framework.

### ***The Investigation Area: GPEC and Warragamba Pipelines Corridor boundaries***

The document should describe the investigation area (page 10) in more detail and clarify that the *boundary* of the Pipelines Corridor forms the southern extent of the GPEC area, not the pipelines themselves. WaterNSW can provide relevant spatial data layers if these are required. This then obviates complexity over the planning controls and zoning operating over the infrastructure corridor.

#### ***Recommendation:***

- That the site description be amended to clarify that the GPEC area includes land to the outer boundary of the WaterNSW Warragamba Pipelines Corridors.

### ***Australian Defence Precinct***

The Warragamba Pipelines Corridor forms the southern boundary to two precincts as identified on the figures in the Framework document: Australian Defence Precinct and Orchard Hills Based Precinct (Figure 11). Some clarity is required regarding whether the Framework's discussion regarding the proposed location for aerospace and defence industries on page 22 relates to within the Department of Defence's Establishment in Orchard Hills, or the Western Parkland City more broadly. Any defence-related projects proposed in proximity to the Warragamba Pipelines will need to be carefully planned and located to minimise risks and impacts to the Warragamba Pipelines Corridor.

### ***Draft Structure Plan***

The Draft Structure Plan for the GPEC area is provided in Figure 10 (page 24). In terms of land use, the Draft Structure Plan depicts the Australian Defence Force site adjoining the Warragamba Pipelines Corridor in the west while employment areas are flagged in the east. Proposed planning and development in these areas will need to be in accordance with the WaterNSW Guideline.

In terms of crossings, Figure 10 shows the future Metro line and the Outer Sydney Orbital crossing the Warragamba Pipelines Corridor. Blue dashed arrows at the east and west also indicate 'explore links to employment areas outside GPEC'. WaterNSW is aware of the Metro line and the proposed OSO crossing the Warragamba Pipelines, however the resolution of the figures renders it difficult to determine the locations or effect of the dashed blue lines. The Eastern line could be either Compass Drive or Old Wallgrove Rd. The Western one appears to come from the Defence

Force Site and is close to the recently upgraded Northern Road, which provides an existing crossing.

Additionally, the locations of the indicative crossings on Figure 16 are unclear, and do not align with those on Figure 10 e.g. is the Eastern crossing Luddenham Road?

Identified crossing locations should be clearly aligned with existing crossing points over the Corridor rather than promoting new crossing routes on all figures. WaterNSW generally does not support new infrastructure crossing the Warragamba Pipelines Corridor and endeavours to keep new crossings to an absolute minimum to allow ongoing operation and maintenance of the critical water supply infrastructure, including emergency works and potential augmentation, to continue unencumbered. We also ask to be consulted in the earliest stages of transport planning including route options when crossings over the Warragamba Pipelines Corridor are being considered.

*Recommendations:*

- The location of crossing points over the Warragamba Pipelines Corridor align with existing crossing routes and that Figures 10 and 16 be revised accordingly.
- That WaterNSW is consulted in the earliest stages of transport planning including route options when crossings over the Warragamba Pipelines Corridor are being considered.
- Land use planning and development of land uses adjoining the Warragamba Pipelines Corridor is undertaken in accordance with the WaterNSW Guideline.

**Part 4 Planning Priorities**

WaterNSW is not currently listed in the State agencies identified in the Plan and potentially included for on-going consultation (page 28). We request that WaterNSW be added to the list of agencies given our role and responsibilities for managing the Warragamba Pipelines Corridor.

*Recommendation:*

- WaterNSW requests that we are added to the list of government agencies mentioned in the Framework given our role and responsibilities for managing the Warragamba Pipelines Corridor which form the southern boundary of the GPEC area.

**Direction 4.1: Integrate land use planning with transport planning**

Action 4.1.4 states: 'Ensure land use changes consider safeguarding of corridors and compatibility with future major infrastructure'. We support this action as helps support protecting the existing Warragamba Pipelines Corridor for future augmentation and / or replacement projects.

Action 4.1.9 seeks to 'explore increased connectivity to key employment areas outside GPEC'. This action is depicted as impacting on two areas of the Warragamba Pipelines Corridor, east and west of the Sydney Metro crossing (see Figure 16 page 41). As raised earlier, these sites are positioned in different locations to the blue dashed lines depicting 'explore links to employment areas outside GPEC' as presented in Figure 10. Again, we request Figure 16 to align with existing crossing points and be consistent with Figure 10 as modified per the suggestions above.

*Recommendations:*

- WaterNSW seeks for the location of points '4.1.9' on Figure 16 which cross the Warragamba Pipelines Corridor to be relocated to where existing crossings occur.
- As raised earlier, WaterNSW requests we are consulted in the earliest stages of transport planning including route options when crossings over the Warragamba Pipelines Corridor are being considered.
- Any proposed transport and infrastructure crossings of the Warragamba Pipelines Corridor are to be consistent with the WaterNSW Guideline.

**Part 5 – Infrastructure**

This section of the document explores the regional and district level needs with respect to indicative infrastructure requirements. We make several observations:

- This section would benefit by identifying key infrastructure existing within or adjoining the GPEC area (e.g. Warragamba Pipelines), making commitments to secure its protection and to minimise any impacts arising from urban growth and development.
- It is unclear why transport corridors are being considered in two separate sections (under Priority 4 – Infrastructure delivery and then under ‘Transport’ (page 72) within the Part 5 Infrastructure chapter. Transport information is also presented in Figures 16 (GPEC Transport Opportunities Map) and 25 (Draft Strategic Transport Infrastructure Map), although different information is presented on the two maps. The Department may wish to explore whether Figures 16 and 25 and the supporting sections can be combined into one section on transport. Existing and proposed crossing points over the Warragamba Pipelines Corridor would need to be depicted accurately and consistently.
- The Australian Defence site appears to be identified as public open space in Figure 23 (page 60). Is this intended?

### ***Next Steps - Precinct Planning – Orchard Hills***

The Framework notes that it has been released in parallel with the Orchard Hills Discussion Paper, which is also currently on public exhibition (page 75). We note that the Orchard Hills Precinct as defined in the Framework (Figure 11) embraces a wider area than that covered by the Orchard Hills Discussion Paper as the latter doesn’t include land in the south that adjoins the Pipelines Corridor. The latter also encompasses a slightly different area to the ‘priority urban release area’ depicted on Figure 13.

#### ***Recommendation:***

- WaterNSW are consulted with regard to planning and development of the Orchard Hills Precinct where strategic policy, frameworks and land planning proposals implicate land that interfaces the Warragamba Pipelines Corridor.
- Any land use planning and development along the boundary of the Warragamba Pipelines Corridor is in accordance with the WaterNSW Guideline.

### **Urban Design Report (UDR)**

The Warragamba Pipelines are not considered in the UDR. We believe that the UDR should be updated to clarify that the Warragamba Pipelines Corridor forms the southern boundary of the GPEC. More information on the Pipelines can be found [here](#) and in the WaterNSW Guideline.

### **Social Infrastructure Needs Assessment Report**

The Urbis Social Infrastructure Needs Assessment Report identifies that the Warragamba to Prospect water pipeline forms part of the southern boundary to the GPEC area. As indicated previously, we believe that the GPEC area would be better defined by explicitly stating that the whole Corridor is excluded from the GPEC area. This would also reduce the risk of any confusion over the planning controls that applied to the Pipelines Corridor.

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