

24 October 2022

Contact: *Justine Clarke*

Telephone: *0457 535 955*

Our ref: *D2022/143361*

Shaun Williams
NSW Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Mr Williams,

Kemps Creek Data Centre (SSD-10101987) – Response to Submissions

Thank you for your Major Projects Planning Portal referral dated 11 October 2022, seeking WaterNSW's comment on the above proposals response to submissions (RTS) document.

The RTS has not addressed WaterNSW's request for further justification to support their 'no impact' assessment comment, or how their assessment addresses requirements within AS/NZS 4853:2012 Electrical hazards on metallic pipelines. The substation and back-up generators are within the 1km buffer determined by WaterNSW as having a potential impact on our pipeline infrastructure. This is a safety concern. While the SEARs did not specify an EME study, the installation of a substation and generators to service the development should warrant such an assessment. Any such report will support the impact assessment and provide assurance to nearby sensitive receivers that there is no expected impact, or that the impacts can be mitigated.

In line with Penrith City Council's comments, we request that a condition be included in any consent issued that an Electromagnetic Energy (EME) report be submitted to the certifying authority prior to the issue of the construction certificate. The EME report should detail the electromagnetic energy likely to be produced and any potential impacts initiated by the proposed substation and the 62 back-up generators at the development and on the surrounding environment.

The EME report must be prepared by a suitably qualified and practicing person in accordance with Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) safety requirements, AS/NZS 4853:2012 and any other relevant standards or policies. The report is to consider the location of the proposed substation and whether it is appropriate or what mitigation measure are required to protect the health of staff and visitors and nearby sensitive receivers.

If the EME report identifies that the impact to the Warragamba Pipelines has intensified (from no risk at all), WaterNSW must be consulted with regards to risk mitigation actions, prior to implementation.

If you have any questions regarding this letter, please contact Justine Clarke at justine.clarke@waterNSW.com.au.

Yours sincerely

A handwritten signature in black ink that reads "Daryl Gilchrist". The signature is written in a cursive, flowing style.

DARYL GILCHRIST
Manager Catchment Protection