Our ref: DOC21/318072
Senders ref: SSD 10479

David Schwebel
Planning and Assessment Group
Department of Planning, Industry and Environment
4 Parramatta Square
12 Darcy Street
PARRAMATTA NSW 2150

Dear Mr Schwebel

Response to Submissions – 200 Aldington Road Industrial Estate (SSD-10479) - additional waterway health comments

I refer to you email of 26 March 2021, requesting input from Environment, Energy and Science Group (EES) in the Department of Planning, Industry and Environment (DPIE) on the Response to Submission (RtS) for 200 Aldington Road Industrial Estate (SSD-10479).

As you are aware, EES provided comments dated 16 April 2021 regarding the RtS, however noted that comments on waterway health would be forwarded under separate cover. EES has now completed its assessment of the applicant's response to waterway health issues, section 6.2 of RtS report – Integrated Water Cycle Management and provides comments below.

The interim stormwater quality and quantity targets of the draft Mamre Road Development Control Plan (DCP) specifically address the objectives of the miscellaneous provisions of State Environmental Planning Policy Western Sydney Employment Area 2009 (WSEA SEPP) – Part 6 clause 33L, which relate to stormwater, water quality and water sensitive design. The objective of this clause is to 'avoid or minimise the adverse impacts of stormwater on the land on which development is to be carried out, adjoining properties, riparian land, native bushland, waterways, groundwater dependent ecosystems and groundwater systems'.

Subclause 2(a) requires the consent authority to consider whether water sensitive design principles are incorporated, which are defined as:

- protection and enhancement of water quality, by improving the quality of stormwater runoff from catchments
- minimisation of harmful impacts of development on water balance and on surface and groundwater flow regimes
- integration of stormwater management systems into the landscape in a manner that provides multiple benefits, including water quality protection, stormwater retention and detention, public open space, habitat improvement and recreational and visual amenity
- retention, where practical, of on-site stormwater for use as an alternative supply to mains water, groundwater or river water.

The statement in the RtS report that the targets are materially different from the business as usual within the WSEA SEPP is incorrect. EES provided interim targets based on field observations (water quality, flows, and other biological/ecological measures) and a calibrated flow (Source)

model. The stormwater quality targets are designed to achieve local water quality objectives, which local governments within the South Creek catchment have already adopted for their state of environment reporting. The stormwater quantity target represents a doubling of existing mean annual runoff but represents a tipping point/threshold before waterways, riparian corridors and groundwater dependent ecosystems are impact by stormwater discharges. Hence the targets are in alignment with the requirements of the WSEA SEPP for protecting ecosystems and minimising (albeit double the current flows) changes to the flow regime.

EES is in the process of finalising the targets and these will be provided to DPIE Place Design and Public Spaces who are finalising the Mamre Road DCP. The flow targets are likely to include a range of metrics to provide flexibility and drive technical innovation within the industry – these include (but not limited to) flow duration curves, MARV, erosion potential index and/or baseflow measures. This work will address issues raised in the Civil Report prepared by at&L at Appendix R. EES has provided flow objectives in the draft Aerotropolis Precinct Plan that are similar to the USIA metrics specified by at&l, and these have also been recommended for inclusion the Mamre Road DCP.

EES is assessing a range of options (treatment) for achieving the targets, and these will be reflected in a technical compliance report following consultation with stakeholders. EES assessment indicates that the targets are achievable, from a technical perspective with costs of delivery varying depending on the option selected. Some options (i.e. similar to the Sydney Water strategy) seek a multi-benefit approach by decreasing %impervious to reduce urban heat, and provide for amenity and liveability, other options are more centralised/end of line.

The proposed condition of consent outlined by the applicant in the RtS report is not reflected in the concept plans at Appendix C. The extent of WSUD infrastructure shown on Lot L in both the Stage 1 Works Plan and the SSDA Estate Master Plan (see pp 5-6, Appendix C) is the same i.e. there has been no change in the extent and type of WSUD infrastructure in the final master plan to show how the cumulative impacts of the development are mitigated/managed to achieve the target. It is therefore strongly recommended, prior to determination, that the applicant provide a concept plan to demonstrate the location and type of WSUD infrastructure that will address the cumulative impacts.

The proponent has identified that the development at Lot F is compliant with the targets. However, compliance is only achieved by calculating the MARV discharged from the entire area of the Adlington Road Industrial Estate, which is largely undeveloped (see calculation provided in Appendix R). Similar to the recommendation above, prior to determination, it is recommended that the applicant provide a concept plan to demonstrate the location and type of WSUD infrastructure that will address the cumulative impacts.

If you have any queries or would like additional information regarding this matter, please do not hesitate to contact Marnie Stewart on 02 9995 6868 at Marnie.stewart@environment.nsw.gov.au.

Yours sincerely

S. Harrison

07/05/21

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