

15 May 2026

Our reference: 233071

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Department of Planning, Housing and Infrastructure
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RE: State Significant Development Application SSD-97711727 at 225-245 Martin Road, Badgerys Creek

Thank you for notifying Sydney Water of SSD-97711727 at 225-245 Martin Road, Badgerys Creek, within the Badgerys Creek Precinct. The SSDA will seek consent for the following:

- Site preparation works
- Rehabilitation of areas disturbed by historic mining and brick-making operations under major project approval MP10_0014 and MP10_0033.
- Bulk Earthworks to the Site to align with the Connecting to Country and Precinct Plan principles including both the disturbed and undisturbed portions to capture the following proposed works:
 - Rehabilitation of Pits 1 & 2 using predominantly on-site fill (Engineered fill import required).
 - Preparation of the remaining site area to Bulk Earthwork Levels (BEL) (not including detailed trimming) for the proposed industrial development as considered under SSD-97688711.
- Quarrying and Export of Bringelly Shale and Clay from select areas of Pit 1 & 2 to rectify the previous approved pit designs to ensure they are geotechnically stable to suit the proposed industrial masterplan.
- Vegetation Removal of 6.97Ha over land that is not certified under the Growth Centres Environmental Planning Instruments.
- Demolition of any remaining structures on the Site.
- Rehabilitation of identified and unidentified contamination and, if required, the construction of a containment cell with a maximum capacity of up to 100,000 m³ in the proposed northeastern corner of the Site (currently identified as Lot 55 of DP 3050).
- Relocation of the Jemena Gas main predominantly burdening Lot 3 of DP127878.0
- If required through an Aboriginal Cultural Heritage Assessment Report (ACHAR), relocation and reburial of artefacts.

Upon reviewing the provided information, **Sydney Water requests additional information for assessment on matters relating to stormwater.**

Sydney Water Corporation ABN 49 776 225 038

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Water, Wastewater and Recycled Water Servicing

Servicing for potable water, wastewater and recycled water will be dependent on the delivery of new assets within the Western Sydney Aerotropolis Area. Full requirements and timelines for servicing can be found in **Attachment 1**.

Stormwater Servicing

Sydney Water cannot support the current proposal until modifications to the proposal are made to meet our requirements.

Attachment 2 provides details on what actions are required to meet these requirements **and** recommendations to the Department regarding the proposed development.

Infrastructure Contributions

- Proponents will be required to pay infrastructure contributions towards Sydney Water's stormwater and recycled water servicing. Sydney Water is preparing a Development Servicing Plan (DSP) for the recycled water and trunk drainage in the Aerotropolis Initial Precincts. This DSP will determine the amount of the stormwater and recycled water Infrastructure Contributions to be paid to Sydney Water for the development.
- Proponents should also be aware that infrastructure contributions are payable for drinking water and wastewater.
- More information on drinking water and wastewater contributions can be found at [land development](#) and the Sydney Water Development Application Information Sheet (for proponent) enclosed.

Next steps

- The Department of Planning, Housing and Infrastructure (the Department) is advised to defer approval of SSD-97711727 until the matters raised in this letter are addressed by the proponent.
- The Department is advised to forward the enclosed Sydney Water Development Application Information Sheet (for proponent) to assist the proponent in progressing their development. This Info Sheet contains details on how to make further applications to Sydney Water and provides more information on Infrastructure Contributions.

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](#).

Please note that the available capacity may change over time depending on the rate of development and increased demand elsewhere in the potable water and wastewater catchments. Sydney Water does not reserve capacity pre-development, and it is advised that the proponent applies directly to Sydney Water for a Section 73 Compliance Certificate as soon as feasible.

The Department can read further advice on requirements for this proposal in Attachments 1-2. If the proponent has any questions, they should contact Sydney Water Account Manager Ebony Evans at Ebony.Evans@sydneywater.com.au. Should the Department require further information, please contact Joanne Chan from the Growth Analytics Team at urbangrowth@sydneywater.com.au.

Yours sincerely,

Growth Analytics Team

Growth and Development, Water and Environment Services
Sydney Water, 1 Smith Street, Parramatta NSW 2150

Enclosed:

- [Sydney Water Development Application Information Sheet \(for proponent\)](#)

Attachment 1 – Detailed servicing requirements

Drinking Water

- The development is currently located in Cecil Park Water Supply Zone (Reduced 4 pressure zone).
- The existing DN100 main in Martin Rd does not have capacity to service the developments in this area. Amplification of this main is required.
- Sydney Water has met with the developer (Goodman) in regard to the sizing of lead-in infrastructure and is working through this with them. Further details of amplification requirements will be provided during Section 73 application.

Wastewater

- Most of the western part of proposed development can be serviced by the proposed Badgerys Creek Carrier Stage 1a Package 2. The project is in detail design stage and the target delivery date is December 2028, subject to delivery funding approval.
- The remaining part of the proposed development is within the South Creek catchment/carrier. The project is in delivery stage, with a target delivery date of mid-2027.

Recycled Water

- The proposed development is located within the Badgerys Creek precinct, one of the Aerotropolis Initial Precincts.
- RW services will be available for this development via a proposed RW scheme supplied from Upper South Creek AWRC. The scheme is expected to be in operation from 2031.
- Sydney Water is currently finalising the preferred configuration of the Recycled Water (RW) scheme, including sizing the trunk mains and facilities, based on available growth data and demand assumptions. The assets, sizes, locations and alignments required for the development will be confirmed once the preferred option is finalised and the structure plan. Each lot will be required to have a recycled water main at the frontage, appropriately sized for connection to the recycled water main.
- The RW demand and staging details have not been provided in the application. Therefore, it has been assumed that total RW average day demand is 78kL/day (estimated by SWC based on 50% of the average potable water usage provided under CN224562).

- Based on the above RW average demand, the RW network will have capacity to service the development after the delivery of lead-in and reticulation mains up to the development frontage (works to be assigned to this development). Sydney Water has met with the developer (Goodman) regarding the sizing of lead-in infrastructure and is working through these works with them.
- The final infrastructure requirements to service this development will be confirmed at the Section 73 stage. Additional information about the development's staging, along with the forecasted RW demands (Average Day Demand (ADD), Maximum Day Demand (MDD), Maximum Hourly Demand (MHD), and seasonal/irrigation demands and rates) will be required to determine the necessary sizes of mains at the Section 73 stage.
- Once the stormwater and recycled water supply is established, any connection between the potable water and recycled water networks will need to be decommissioned.

Note: Interim service

The RW scheme for the Aerotropolis Initial Precincts is expected to be completed by 2031. In the interim, services will be available through the Drinking Water (DW) network but will be limited to non-potable indoor use only. Irrigation demand must be supplemented using onsite stormwater harvesting and reuse until the RW scheme is commissioned.

The following requirements must be met prior to obtaining RW connection approval:

- Smart meter installation,
- Confirmation of the indoor and irrigation demands from the developer.

To maintain recycling water network continuity, the developer needs to identify any available RW main in the neighbouring lots. If any cross connection between the potable water and recycled water network is required, the developer must clearly show the location of this on the design plans which need to be reviewed by Sydney Water. Once the stormwater and recycled water supply is established, the connections (if any) between the potable water and recycled water networks will need to be decommissioned.

The developer must also provide to Sydney Water the finished surface levels. Furthermore, all pipes and valves sizing and design must comply with WSA code.

Attachment 2 – Detailed stormwater requirements

Sydney Water has reviewed the following documents in preparing this advice:

- Surface Water Impact Assessment by Engeny, Rev 1.0, Issue 12.03.2026
- Flood Impact & Risk Assessment by Colliers, Rev B, Issue 19.03.2026
- Groundwater Assessment by Arcadis, Rev A, Issue 11.03.2026
- Civil Engineering Report by Arcadis, Rev B, Issue 11.03.2026
- Civil Drawings by Arcadis, Rev C, Issue 04.03.2026
- Dam Dewatering Plan by SLR, Rev 0.1, Issue 13.03.2026
- Riparian Land Assessment by SLR, Rev 1.0, Issue 16.03.2026
- Rehabilitation and Closure Assessment by IEMA, Rev 4.0, Issue 20.03.2026
- Site Wide Remedial Action Plan by JBS&G, Rev 1.0, Issue 24.03.2026
- EIS by Urbis, Issue 27.03.2026

Sydney Water does not endorse the SSD on matters relating to stormwater and requests further information from the developer to enable assessment of the proposed bulk earthworks against the Aerotropolis Integrated Stormwater Scheme. The matters set out below are to be considered by DPHI and are to be addressed by developer.

The state significant development application (SSD-97711727) establishes bulk earthworks levels that will underpin the future site masterplan to be delivered under a subsequent state significant development application (SSD-97688711). It is therefore critical that the bulk earthworks design, including final landform levels, drainage layout and staging, is consistent with and facilitates the efficient delivery of the Aerotropolis Integrated Stormwater Scheme.

The bulk earthworks design must demonstrate consistency with the Aerotropolis Integrated Stormwater Scheme, including:

1. Confirmation of sub-catchment boundaries and contributing areas to each regional basin;
2. Consistency of basin footprint areas, storage volumes, locations and levels with the Aerotropolis Integrated Stormwater Scheme (or as otherwise agreed with Sydney Water);
3. Provision for trunk drainage corridors, including appropriate widths, connections, and integration with riparian corridors, riparian streets (where applicable), and Vegetated Riparian Zone requirements for mapped Strahler-order waterways;
4. Accommodation of stormwater harvesting infrastructure, including mains and associated infrastructure corridors; and
5. Consistency of pre- and post-development catchment areas, flow paths, and intended design flow distribution to the four regional basins and three trunk drainage channels.

The applicant must provide supporting written and drawing documentation to demonstrate the above, including plans, long sections and comparison drawings

against the Aerotropolis Integrated Stormwater Scheme. This documentation must clearly demonstrate that the bulk earthworks staging and final landform support the function, constructability and staging of the regional stormwater infrastructure.

Early consultation with Sydney Water and formal endorsement of the bulk earthworks design is required to reduce the risk of design conflicts and rework in subsequent stages of development. Sydney Water's Civil and Geotechnical Specifications (including requirements for fill beneath future basin infrastructure, e.g. BC_BC01) can be provided on request.

Sydney Water also requires the following matters to be addressed:

- Further details of the proposed fauna underpass, including its integration with the trunk drainage system. Upstream and downstream invert levels, grades, and hydraulic continuity must be demonstrated and confirmed against the Aerotropolis Integrated Stormwater Scheme.
- Longitudinal sections through each regional basin and across the development site. Invert levels of each basin and the connecting trunk drainage infrastructure must be clearly documented.

It is noted that invert and infrastructure levels presented in the current Civil Drawings are not sufficiently legible to enable verification of consistency with the Aerotropolis Integrated Stormwater Scheme.

Comments for DPHI Consideration

The Dam Dewatering Plan proposes that water from on-site dams be reused on-site or irrigated onto ENZ-zoned land which extends along Badgerys Creek and South Creek. Sydney Water recommend careful consideration regarding water quality and potential impacts on the receiving environments. The following matters should be carefully considered and managed by the applicant:

- *Water management pathway:* The Plan is to clearly define the on-site reuse and irrigation regime to ensure the land is not being over irrigated.
- *Water quality:* Sampling data provided in the Plan indicates that dam water quality exceeds ANZECC (2000) / ANZG (2018) freshwater ecosystem guideline trigger values. Specifically, pH is up to 10.0 at FD2 with multiple dams above pH 8.0; turbidity reaches 963 NTU at FD5 with multiple locations above the 20 NTU trigger; and dissolved oxygen at FD3 (31.3%) is below the trigger range. Consider impacts of high pH water for irrigation on riparian area.
- *Diffuse runoff to waterways:* Consider with reference to soil conditions, application rates and topography, that irrigated water will not result in surface runoff, throughflow or groundwater discharge to natural waterways. Where this cannot be

demonstrated, the water quality criteria and treatment measures applicable to a direct discharge should apply.

Sydney Water notes the extensive filling adjacent to the regional stormwater basins, particularly on the eastern side. This will result in the basins sitting adjacent to steep batters, which would compromise public domain amenity outcomes for the Wianamatta precinct and the objectives of the NSW Government's Parkland City, including the integration of waterways and basins as blue-green public amenity.

Considerations for the Applicant

- Strahler-order creek lines are to be rehabilitated in accordance with the Water Management Act 2000 and the Western Sydney Aerotropolis Development Control Plan Phase 2. These rehabilitation works are not subject to Sydney Water reimbursement, and the land is not to be acquired by Sydney Water. Sydney Water will manage the rehabilitated waterways after the agreed timeline.
- Land for regional stormwater basins (BC_BC01, BC_BC02, BC_SC01 and BC_SC02) will be acquired by Sydney Water. Construction costs can be reimbursed under the terms of a developer works agreement with the applicant. Sydney Water will maintain the basins after the agreed establishment period.
- Land for trunk drainage channels and riparian streets will remain in private ownership. Construction costs of the drainage channels will be reimbursed. Sydney Water will manage these channels after the agreed establishment period.
- The applicant should liaise with Sydney Water regarding earthworks for basins and trunk drainage channels as these works may be reimbursed through the developer works agreement. Please refer to the Stormwater Developer Works Policy [here](#). This includes Attachment A which shows defined extend for stormwater infrastructure works for reimbursement.
- Sydney Water notes that the submitted plans do not clearly demonstrate consistency with the Scheme Plan. Any changes to the Scheme Plan will be subject to Sydney Water's endorsement and may require entering into a Planning Services Agreement.
- Any works within the Vegetated Riparian Zone of mapped natural waterways are to be undertaken under a Controlled Activity Approval in consultation with Sydney Water.