

Melanie Mitchell
Independent Pricing and Regulatory Tribunal NSW
Online [REDACTED]

17th May 2024

Dear Melanie,

**RE: IPART NSW REVIEW
COST OF STORMWATER DRAINAGE IN THE MAMRE ROAD PRECINCT
ISSUES PAPER EXHIBITION SUBMISSION**

Introduction

This submission is made by Gray & Walsh Pty Ltd on behalf of the Western Sydney Airport Business Park Trust, in response to IPART's exhibition of the "Cost of stormwater drainage in the Mamre Road Precinct Issues Paper dated 23rd April 2024.

The Western Sydney Airport Business Park is a 67.2ha private development, located within in the Western Sydney Aerotropolis first release Agribusiness Precinct, at the corner of the Northern Road and Elizabeth Drive. To date for this development we have lodged a Scoping Report, received Secretary's Requirements and we expect to be able to lodge our State Significant Development Application in June 2024. As part of this process, we have consulted widely with all agencies, and particularly Sydney Water. We are familiar with business as normal for all agencies and we follow with interest the progress and issues arising in the Mamre Road Precinct as a precursor to development elsewhere in the Aerotropolis. It is with this perspective that we provide our input to the review.

Submission

Approach

The approach should be broadened to scrutinise the reasons for the nomination of Sydney Water as the trunk drainage authority for stormwater. From an industry perspective it would seem that this critical role has been assigned to an entity which was not traditionally assigned or adequately resourced to manage stormwater. The objective of protecting and enhancing our waterways is one which local councils are well able to manage. The suggestion that councils adopt a "grey infrastructure" approach to stormwater management is ill informed and does not reflect current stormwater standards and DCP's. Further councils are best placed to maintain stormwater, and through their current rates system, have a source of funding for this. The very high cost of the Sydney Water Scheme is evidence of the uncertainty this entity brings to the design and management of these systems.

Storage

One of the key issues that we seek be addressed, is the inclusion of regional stormwater storage and reuse in an attempt to replicate predevelopment runoff volumes. As we have seen throughout the Sydney basin catchment with storages up to the size of Warragamba Dam, this is a flawed approach. It gives downstream communities a false sense of security and the storage capacity of stormwater basins or tanks will always be exceeded. The more usual practice of controlling peak discharges is more efficient and cost effective with arguably no additional detriment to the downstream watercourses.

The complex system of storage and pumped stormwater reuse in catchments already provided with potable and recycled water is an inefficient use of capital. Stormwater reuse at source (i.e. as is required in most council controls for warehouses etc) is a far more efficient and effective measure. Further the concept of mixing highly treated and controlled wastewater with stormwater in reservoirs would not appear practical and it is doubted whether this would ever be realised.

Open Channels

The requirement for open channel stormwater conveyance for catchments exceeding 15ha should be revised up. The 15ha threshold is far too small and, in some cases, would require channelised stormwater conveyance for a single warehouse site. This requirement will result in developers designing convoluted drainage systems to reduce catchment sizes and will increase nuisance flows within the catchment. Typically for open channel conveyance councils use approx. 60ha.

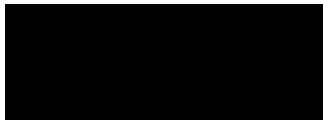
Developer Charges and Timing of Payment

Typically, development in a new release area pays for most of the infrastructure that supports it. This is true also for stormwater. The recovery of stormwater infrastructure costs (both land take and works) through Council 7.11 or 7.12 plans or a DSP is consistent with this principle. However, when a scheme for managing stormwater extends beyond a reasonable and efficient scope of work and/or associated land take it becomes more a question of chasing ideals at the expense of providing efficient outcomes and development. If the government or its agencies deem that ownership of large areas of land in excess of the greater of the 1% AEP or Riparian plus a buffer is preferred, then that agency should fund the acquisition from its own funds. Further, it should be required to acquire the land through the compulsory acquisition process, where that land is valued by an independent professional.

We trust that these points assist in IPART's scoping and review of the cost of stormwater drainage in the Mamre Road Precinct. Should you have any questions or require follow up regarding our submission please contact the undersigned via [REDACTED].

Yours sincerely

WESTERN SYDNEY AIRPORT BUSINESS PARK



MICHAËL GRAY

Infrastructure Director