

18 November 2015

Paul Robillard  
Director, Housing Land Release  
Department of Planning and Environment  
GPO Box 39  
Sydney NSW 2001

**RE: Greater Macarthur Preliminary Land Release Strategy and proposed amendments to the *State Environmental Planning Policy (Sydney Region Growth Centres) 2006***

Dear Mr Robillard,

Thank you for providing Sydney Water the opportunity to review and comment on the Department of Planning and Environment's Greater Macarthur Preliminary Land Release Strategy and proposed amendments to the *State Environmental Planning Policy (Sydney Region Growth Centres) 2006*. We have reviewed the exhibited documentation and provide the following comments for your consideration.

Sydney Water welcomes the state-led rezoning process and opportunity for whole precincts to be planned with Government to co-ordinate input on complex planning issues. We are particularly enthused because of the importance of co-ordinating infrastructure delivery between agencies, local councils and developers to meet community and environment outcomes in the most efficient and effective way.

We understand that the northern precincts of Menangle Park and Mount Gilead as well as the southern precinct of Wilton have been identified as areas that have been identified as suitable for urban development.

We note that infrastructure required to service the proposed land release area is to be at 'no cost to government'. If Sydney Water were to be the service provider, we would need to work with developers under appropriate commercial terms, reflecting the 'no cost to government' principle.

Sydney Water supports the two phase approach proposed by the Department of assessing urban capacity and determining a land use and infrastructure strategy. We would be pleased to work on an overall servicing strategy for the priority land release precincts in collaboration with the Department of Planning and Environment, the local councils and interested developers (noting some work that has already been completed by developers) which aligns with the proposed development timing and sequencing.

In line with our advice in June 2015, Sydney Water is keen to work with the Department of Planning and Environment, local councils, developers and the community on an integrated water

management approach to water servicing (including stormwater) for the Greater Macarthur region to ensure better outcomes for communities and waterways (river health) and improve alignment with land use planning.

There is minimal existing capacity (water and wastewater, networks and treatment) for any of the proposed new release areas and servicing for dwellings. Utilising any available capacity is dependent on consideration of the growth servicing needs for both the South West and Western Sydney Priority Land Release Areas. The preliminary strategy does not highlight this and we encourage the Department to collaborate with Sydney Water to address these issues at this early stage.

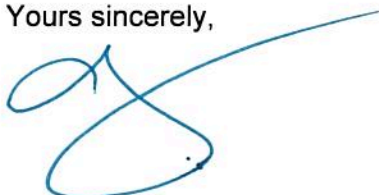
Our preliminary review is that the indicative infrastructure plans presented in the exhibited material are not likely to meet the test for prudent and efficient expenditure if funded by Sydney Water. Should Sydney Water be the service provider (for parts or whole of the investigation area), we would re-examine servicing options and the need, timing and cost of new or augmented networks and treatment facilities. In this way, planned infrastructure is able to demonstrate an acceptable level of value to all our customers and therefore appropriate that the cost be spread across Sydney Water's customer base.

The strategy would also need to be consistent with the Hawkesbury Nepean wastewater strategy currently being developed by the Environmental Protection Authority and Sydney Water.

The provision of more detailed information on the timing, yields and sequencing of development and options analysis will be important to investigate the optimal water servicing solution(s) for these areas, in line with Sydney Water funding principles and our corporate vision to be lifestream of Sydney for generations to come.

Detailed comments on specific content of the preliminary report are provided in Attachment 1. If you require any further information or clarification, please contact Beau Reid of Urban Growth Strategy on 02 8849 4357 or email [beau.reid@sydneywater.com.au](mailto:beau.reid@sydneywater.com.au).

Yours sincerely,

A handwritten signature in blue ink, consisting of a large, stylized 'G' followed by a horizontal line that loops back under the 'G'.

Greg Joblin  
**Manager, Growth Strategy**



## Attachment 1

### Detailed comments

- We ask the Department for more clarity on whether the other precincts mentioned but not released for investigation should be excluded from servicing strategies as we move forward in the coming years.
- The proposed Menangle Park and Mount Gilead priority precinct incorporates (although is not limited to) the Menangle Park and Mount Gilead release areas (as listed in the *Metropolitan Development Program 2010/11*). The current commitment to servicing the current/former release areas are reflected in Sydney Water's 2014 *Growth Servicing Plan*.
- The scope for trunk network infrastructure is currently inadequate to service Mount Gilead and Wilton with water.
- We note inconsistencies in the description of which water supply areas will be impacted. (i.e. Mount Gilead is likely to require extension of Rosemeadow, Menangle would be supplied from Campbelltown South and Picton will not be supplying Wilton).
- An additional 10, 000 dwellings in Mount Gilead would require more than a 5ML reservoir (e.g. 14MLD MDD), and would also require trunk pipe and pumping infrastructure to be delivered.
- The proposed upgrades for the wastewater network do not fit with any servicing strategy and are misleading in their details.
- To avoid misinterpretation, we would appreciate the Preliminary Strategy and Land Use and Infrastructure Analysis Report being clearer that the analysis (for water, recycled water and sewerage) has been developed by AECOM for the Department of Planning and Environment and especially that the indicative plans do not commit Sydney Water to their delivery. For instance, while Sydney Water has no plans to build a wastewater treatment plant at Appin and no such suggestion is made in the report, other parties could (and have already) misconstrue the indicative information in the figure (see figure 19 of the Land Use and Infrastructure Analysis Report).
- It appears the exhibited documents have taken information from AECOM's first draft of the report and have not included Sydney Water's feedback on the *Greater Macarthur Land Release – High Level Services Infrastructure Strategy*. We ask that the Department examine our comments to this strategy and incorporate them in its revisions.
- The Preliminary Strategy is not clear whether the infrastructure requirements for the priority precincts represent all water related infrastructure for the total anticipated total development yield, i.e. suitable plus encumbered (see pages 5 and 7). For instance, the number and scale of new reservoirs and pumping stations. In addition, the need for new or amplified trunk networks and treatment/filtration plants are not included in the tables.

- The analysis undertaken for the 2 proposed priority precincts does not adequately cover the issue of treatment for either product. It is likely that the WFP will require augmentation to supply the proposed 33,000 dwellings (with additional growth in the South West Priority Land Release Area), which has not been mentioned. There is no current wastewater treatment option included in the analysis. The implication that Glenfield WWTP may have capacity for Menangle and Mount Gilead would require further investigation and significant trunk works.
- The statement in the Land Use and Infrastructure Analysis Report that Sydney Water has commenced construction of a new 2ML reservoir to service Bingara Gorge development is incorrect and should be deleted or revised accordingly (see page 23, Land Use and Infrastructure Analysis).
- Sydney Water is not currently operating a Recycled Water Scheme in Appin and Douglas Park.
- The reference to an amplification of the Macarthur WFP as part of Sydney Water's South West Growth Management Strategy is incorrect and should be deleted (see page 23, Land Use and Infrastructure Analysis). As advised in June 2015, the Macarthur WFP has capacity for the predicted increase in average day demand and will need to be amplified to accommodate maximum day demand (timing will depend on development in the Greater Macarthur region as well as infill development in existing urban areas, and other greenfield growth in South West Sydney).
- The reference to Rosemeadow Reservoir as a potential source of recycled water is incorrect and should be deleted. Rosemeadow Reservoir supplies drinking water not recycled water (see page 23, Land Use and Infrastructure Analysis)
- In terms of the potential future plans for sewerage (see page 24, Land Use and Infrastructure Analysis Report), an alternative servicing arrangement includes potential for the priority precincts to be serviced by a hybrid system of decentralised (local to precinct-scale) wastewater systems (like the private system at the Bingara Gorge development) and more centralised systems.
- 7 pumping stations in Wilton/Maldon relate to a strategy of a centralised WWTP at Appin. This would not be feasible if Appin is to be developed 20 years after its delivery. Trunk requirements have also not been considered.