Re: Exhibition of Marsden Park North Precinct Plan

Thank you for providing the Natural Resources Access Regulator (NRAR) the opportunity to comment on the above precinct plan and rezoning. NRAR provides the following comments and recommendations for the Department of Planning and Environment’s consideration.

Riparian Corridor Protection and Management

NRAR has reviewed the Marsden Park North Precinct Plan exhibition discussion paper, draft indicative layout plan, development control plan and relevant technical studies and provides the following comment:

- Any proposed works on waterfront land may require Controlled Activity Approval from NRAR (note that if works are carried out on Crown Land, it may fall under an exemption).
- Any management considerations for any riparian zones on site should be consistent with NRAR’s Guidelines for Controlled Activities. Please note that these guidelines were updated in July 2012. For the revised guidelines, please refer to: https://www.industry.nsw.gov.au/water/licensing-trade/approvals/controlled-activities
- It is noted that 23 watercourses with different stream orders were mapped within the precinct and these should be retained. NRAR supports, in principle, the watercourse mapping that has been undertaken and the determination of ‘rivers’ under the Water Management Act 2000.
- Protection of riparian corridors and Vegetated Riparian Zone (VRZ) should be maintained. Any development within the outer 50% of a VRZ may be possible if that impact is offset by protecting and managing an equivalent area along the watercourse in accordance with NRAR guidelines for Waterfront Land.
- There is potential for impacts to Groundwater Dependent Ecosystems (GDEs) to occur with development of the Marsden Park North Precinct particularly with the flood prone land and the drainage systems.
- There needs to be an understanding of the groundwater environment and how it relates to surface water.
- The potential impact on groundwater and Groundwater Dependent Ecosystems (GDEs) should be addressed as part of the precinct planning to ensure that the location of sites likely to have ongoing environmental impact (e.g. playing fields with
effluent irrigation facility have been thoroughly assessed in regard to the underlying hydrogeology, in particular consideration of potential groundwater discharge to bounding deeply incised rivers and its contribution to their base flow needs to be specifically addressed.

- NRAR recommends that APZs are located wholly within the urban development land rather than within the riparian corridors.
- The impacts of the proposed future development on water quality should be considered. Appropriate stormwater management will need to be implemented to minimise impacts on downstream environments such as riparian areas, groundwater and adjoining land. NRAR considers that all stormwater treatment measures should be consistent with Water Sensitive Urban Design objectives and to aid in the protection of the receiving water source quality, all stormwater runoff must be appropriately treated at its source and/ or diverted through the stormwater treatment process designed for the site, prior to discharge from the site.

In regards to riparian management and protection, NRAR requests to be engaged during the lodgement of the development application for the proposed rezoning.

Please contact Anisul Afsar, Water Regulation Officer (Parramatta) on (02) 8838 7561 or anisul.afsar@nrar.nsw.gov.au if you have further enquiries regarding this matter.

Yours sincerely

Ryan Shepherd
A/Manager Regional Water Regulation (East)
Natural Resources Access Regulator
Department of Industry – Lands & Water

Date: 26 October 2018