20 June 2019

General Manager
Goulburn Mulwaree Council
Locked Bag 22
GOULBURN NSW 2580

CC: Kate Wooll

Dear Sir/Madam

Planning Proposal - North East Goulburn Enterprise Corridor Precinct (REZ_0003_1819)

I refer to Council’s email of 31 May 2019 referring the revised Planning Proposals for the North East Goulburn Corridor Precinct to WaterNSW for its consideration in accordance with Condition 3 of the Gateway Determination and prior to public exhibition.

The Planning Proposal involves rezoning of this area from B6 Enterprise Corridor to IN1 General Industrial under Goulburn Mulwaree Local Environmental Plan 2009 (LEP). WaterNSW also notes the intent to extend the original Precinct to include a site for a proposed poultry rendering plant, to allow for master planning.

WaterNSW previously commented on the Planning Proposal prior to the Gateway determination (6 March 2019; our ref: D2019/23176). I note that the main change to the Proposal is that Council is now proposing to add rural industries as a permissible use within the IN1 General Industrial zone and that this change will apply across the entire Local Government Area (LGA).

WaterNSW does not object to the Planning Proposal proceeding to exhibition. However, currently the Proposal does not reference WaterNSW’s previous advice, including the risks identified by the Strategic Land and Water Capability Assessments (SLWCAs). There are also some water quality risks and constraints associated with the site that should be given greater recognition in the Planning Proposal.

Direction 5.2 Sydney Drinking Water Catchments

Direction 5.2 requires that all new development within the Sydney Drinking Water Catchment must have a neutral or beneficial effect (NorBE) on water quality and for the relevant planning authority to give consideration to the outcomes of the SLWCAs.

WaterNSW has undertaken SLWCAs for Light Industrial and Intensive Livestock Agricultural Uses (Figures 1 and 2, attached). The SLWCA ranges from Low to Moderate Risk to water quality for Light Industrial and Moderate to Extreme Risk to water quality for Intensive Livestock Agriculture. The areas of Extreme Risk to water quality are associated with the drainage lines through the site which feed to the Mulwaree River.

Development in areas of High to Extreme water quality risk should be recognised as a site constraint and avoided where possible to help ensure that future development will be able to meet a NorBE on water quality. The proposed poultry rendering plant is largely associated with land which has a Moderate Risk to water quality.
State Environmental Planning Policy (Sydney Drinking Water Catchment) 2011 (SEPP)

The Proposal recognises that the Sydney Drinking Water Catchments SEPP requires that development consent cannot be granted unless there is a NorBE on water quality. It notes that future DAs will be subject to the SEPP and will require the concurrence of WaterNSW following a NorBE assessment. These provisions are supported.

Sewerage

The Proposal discusses the current water and sewerage infrastructure available, noting that current services are limited to the north of the Precinct. New infrastructure is proposed including for water, sewerage (new sewer reticulation, rising main, and upgrades to the existing sewer pumping station) and stormwater management. The supporting Business Case identifies that these services will be upgraded to accommodate industrial outputs. WaterNSW supports these initiatives and believes that any new industrial development in the area should be connected to the sewerage system.

Stormwater

New development will need to provide additional stormwater water quality controls, taking into account the extent of future impervious areas and applying appropriate water quality treatment measures. It will also will need to take into account any constraints and values presented by the existing drainage features on site (discussed below). Such matters can be addressed at the DA stage and through the requirement for all development to have a NorBE on water quality.

Drainage Features

The Proposal is currently silent on waterways and other drainage features on the site. The site is bisected by a 3rd order stream and a 1st order drainage feature, with a further 1st order drainage feature traversing the south-western corner of the site. The Proposal should identify the drainage features and whether there are any existing open areas of water on the site (e.g. farm dams), and also identify how these features might be managed in future development of the area.

Permissibility of Rural Industries

The change from prohibition to permissibility of rural industries in the IN1 zone will carry over to all IN1 zones across the LGA. This will expand the range of current permissible uses to include agricultural produce industries, livestock processing industries and composting facilities, further to uses such as stock and saleyards and intensive animal productions which are already permissible with consent in the IN1 zone.

The Proposal recognises that rural industries may have negative impacts on water quality, but that NorBE requirements under the SEPP would apply to any DA. The recognition of this control is appropriate. Such developments are likely to need connection to the sewer and will require concurrence from WaterNSW.

If you have any questions regarding the issues raised in this letter, please contact Stuart Little at stuart.little@waternsw.com.au.

Yours sincerely

CLAY PRESHAW
Manager Catchment Protection
Figure 1. SLWCA – Light Industrial: Risk to Water Quality
Figure 2. SLWCA – Intensive Livestock Industries: Risk to Water Quality