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## Mamre Road Stormwater Scheme Review

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### **Submission from BirdLife Southern NSW to the Mamre Road Stormwater Scheme Review**

BirdLife Southern NSW is the largest branch of BirdLife Australia in this state and covers most of the state's coastline, central regions and southern regions. Our parent organisation, BirdLife Australia, is an independent not-for-profit and has over 380,000 supporters nationally<sup>1</sup>.

BirdLife Australia aims to conserve and increase the populations of native bird species, a goal directly aligned with recent announcements by both NSW<sup>2</sup> and federal governments<sup>3</sup> claiming an intention to implement nature positive policies aimed specifically at preventing further extinctions of native fauna and flora. With one in six bird species vulnerable to extinction in Australia today<sup>4</sup>, all NSW government agencies and corporations have a responsibility to act to cease causing more damage to natural systems and habitats.

Along with other conservation organisations, we are interested in the biodiversity of the Sydney basin as the place where post-colonial land clearing and alienation by exotic species first began on this continent. On the Cumberland Plain, an enormous area that was once completely forested, this process of land clearing and habitat destruction has been extensive but by no means complete. A range of national parks and bush reserves remain, the viability of which are highly dependent on the habitats nurtured in and around the waterways of the Cumberland Plain of which the Mamre Road precinct is a part.

We note that Sydney Water has a statutory responsibility not just to protect public health but also to protect the environment by "Safeguarding waterways and ecosystems through sustainable water management practices"<sup>5</sup>. Our reading of the draft Mamre Road Stormwater

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<sup>1</sup> [Our Impact - BirdLife Australia](#)

<sup>2</sup> [Legislating for nature positive – NSW Government proposes major changes to biodiversity laws | Clayton Utz](#)

<sup>3</sup> [Nature Positive Plan: better for the environment, better for business - DCCEEW](#)

<sup>4</sup> The Action Plan for Australian Birds 2020, released by BirdLife Australia in collaboration with Charles Darwin University in December 2021 - [The Action Plan for Australian Birds 2020 reveals that one in six are nationally threatened | BirdLife DataZone](#)

<sup>5</sup> See Sydney Water Act 1994, section 21 and [Statement of Corporate Intent 2021-22 \(sydneywater.com.au\)](#)

Scheme Review report<sup>6</sup> satisfies us that Sydney Water is making a genuine and strategically prudent attempt to fulfill this obligation with implications for the future management of stormwater in all areas of the Cumberland Plain and beyond.

We note that Sydney Water's proposal for the Mamre Road Stormwater Scheme is to introduce stormwater recycling as a non-potable water supply to be made available to homes and businesses in the precinct and adjacent areas. This is to be achieved by the construction of naturalised channels feeding into engineered ponds for water retention, filtering and re-use instead of being piped away to somewhere else. It is not just a waste water scheme, but is aimed at providing protection to the waterways in a manner that also harvests a new and sustainable resource.

Sydney needs potable water for our suburbs. It also needs wetlands and viable habitats along streams for wildlife and for people as places of recreation. We recognise that the Sydney Water proposal has a very good chance of fulfilling those needs. The proposed scheme has these benefits, both for people and wildlife: It will enable Sydney Water to:

- capture and store stormwater in places that will serve both as recreational areas for residents and wetlands and bush habitat for wildlife
- filter the captured water to prevent runoff of pollutants into the wider catchment and river system
- reduce the volumes of water running along natural streams during storms that would otherwise increase erosion and pollution of downstream banks and pools
- ensure that stormwater is re-used as grey water to substitute for potable water in factories, gardens and toilet cisterns, conserving the limited water supplies Sydney will always endure during times of drought.

We applaud Sydney Water and the NSW government for developing the scheme because of these very substantial and timely benefits.

We are concerned, however, that attempts to develop a modified model at lesser cost, as examined in the draft report, risks compromising those benefits. As we understand it, the reduced cost is expected to be realised by making the engineered stormwater storage areas smaller in area but greater in depth. These are the reasons why we believe this postulated modification to Sydney Water's proposal is NOT a good idea:

- Smaller but deeper engineered storage facilities really means that there will be less land regenerated as wetlands and associated bush habitat. This of itself is a cause for concern because that means there will be less area available for wildlife habitat and less land available for human recreation.
- Deeper storage facilities are more worrying because they imply that in lieu of naturalised storage areas that may serve as wetlands or reserves, there will instead be engineered vessels that will not be so readily adaptable as habitat for wildlife or indeed as places for human recreation.

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<sup>6</sup> [https://www.ipart.nsw.gov.au/documents/draft-report/draft-report-mamre-road-stormwater-scheme-september-2024?timeline\\_id=16979](https://www.ipart.nsw.gov.au/documents/draft-report/draft-report-mamre-road-stormwater-scheme-september-2024?timeline_id=16979)

- The postulated modified scheme is based on unknown cost assumptions, i.e. the estimator does not know and cannot say whether geological factors may or may not add to the estimated cost of making the storage facilities deeper.

We see no merit in this attempt to reduce the cost of the proposed scheme. It is speculative in asserting that in terms of net social and environmental cost, it is cheaper. That case is not made out by the evidence given to the panel. In contrast, the draft report makes it clear that in the main, Sydney Water's cost assumptions are reasonable. The modified version is cheaper but only because additional social and environmental costs have been ignored and because of the dubious belief that excavation costs are not likely to blow out.

We make no comment on the issue of who should pay for the cost of the scheme proposed by Sydney Water other than to say this –

- It is understandable that a land developer who is worried about the prospect of having to bear at least part of the cost of the scheme, will wish to advocate for ways in which the overall cost of the scheme could be reduced, so that their portion of the cost might also be reduced.
- It is understandable also that a land developer would wish to reduce the proportion of their land likely to be resumed for the purpose of establishing stormwater storage and processing areas for the scheme.

We say that neither of these concerns should be considered a relevant factor in the panel's assessment of the scheme proposed by Sydney Water. Reducing a developer's cost does not reduce the costs of the scheme itself, but only the cost to the developer where that cost results in a lesser social and environmental benefit. The cost estimates of the lesser scheme do not attach a value to the costs of reducing the recreational amenity for the community or reducing the environmental benefits. Thus the lesser overall cost of the scheme for the state does not reduce the net cost to the community. In all probability those costs will be considerably greater and will endure in perpetuity.

We urge that the panel's draft report recommend to the government that Sydney Water's proposal be approved and that the alternative proposal be rejected.

Yours sincerely



Barry Walsh  
Secretary, BirdLife Southern NSW