

16 November 2021

Ms Kiersten Fishburn
Secretary
Department of Planning, Industry and Environment
12 Darcy Street
Parramatta NSW 2150

Attention: Nathan Heath
email: Nathan.Heath@planning.nsw.gov.au

Dear Sir/Madam

RE: Upper South Creek Advanced Water Recycling Centre (SSI- 8609189)

Thank you for the opportunity to provide comments on the proposed Upper South Creek Advanced Water Recycling Centre (AWRC).

The project, by Sydney Water, will provide wastewater services to the South West Growth Area and Western Sydney Aerotropolis Growth Area and produce high-quality treated water.

The project includes a new wastewater treatment plant at Kemps Creek and three pipelines - a treated water pipeline carrying treated water from the AWRC west to Nepean River, an environmental flows pipeline which is an extension of the treated water pipeline and carries water to Warragamba River and the brine pipeline which carries brine east from the AWRC to the Malabar system. The brine pipeline, about 24 km in length and about 0.6 m in diameter, crosses the Western Sydney Parklands at the Cecil Hills Precinct, south of Elizabeth Drive. Several small compounds are proposed within Western Sydney Parklands during construction.

Greater Sydney Parklands has met with Sydney Water on a number of occasions to consider the proposal and potential impacts on the Western Sydney Parklands, to ensure protection of physical environment, native fauna, native vegetation and mature trees, recreation facilities, and ensure ongoing access for visitors to the Parklands.

Greater Sydney Parklands supports the proposed alignment and flexibility to allow the detailed design to adapt to optimize environmental outcomes and protection of more significant vegetation and old growth trees within the Parklands. As previously advised to Sydney Water any disturbance to recently constructed infrastructure is not supported.

A number of the recommendations provided at the time of Request for the Secretary's Environmental Assessment Requirements remain relevant as detailed design and construction planning for the project progresses, to ensure impacts on the Parklands and rehabilitation of disturbed areas are appropriately managed. These are provided at Attachment A.

We welcome ongoing collaboration with Sydney Water during detailed design, including consideration of opportunities for water re-use within the Sydney Water pipelines for recreational activities within the Parklands, to improve environmental outcomes and to ensure positive visitor experiences and future access, development and activation of the Parklands for the community.

Thank you for the opportunity to comment on the application. If you have any questions, please do not hesitate to contact me.

Yours sincerely



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ATTACHMENT A: Recommendations for detailed design - Upper South Creek Advanced Water Recycling Centre (SSI- 8609189)

Detailed design should:

- Consider, in close consultation with the Greater Sydney Parklands, the appropriate route through the Parklands. The route and depth should be developed to ensure the works and pipeline have minimal impact on existing vegetation, particularly old growth trees. Any disturbance to recently constructed infrastructure is not supported.
- Consider opportunities to re-use water within the Sydney Water pipelines for water recreational activities within the Parklands, and to improve environmental outcomes. This may include water play and swimming holes.
- Provide details of the maintenance requirements for the pipeline and any restorative vegetation, and clearly outline requirements for access within the Parklands. Maintenance of the pipeline should not impact on the public recreation and use of the Parklands, or result in increased costs to Greater Sydney Parklands in order to ensure protection of Sydney Water's asset.
- Ensure the Construction Environmental Management Plan will consider:
 - minimal impact to public access within the Parklands
 - emerging weed issues in the area. Controls for grass weeds will need to be provided. Chilean Needle Grass and Coolatai Grass are two identified problem grass weeds
 - phytopthera issues in the area towards Kemps Creek – a fungal infection that kills Eucalypts. Soil testing within the known phytopthera region (Kemps Creek, Shooting Centre, west of the canal) should include tests for this fungus and protocols in place where it is found to occur.

The Construction Environmental Management Plan should provide a section that directly addresses work within the Parklands, for agreement with the Greater Sydney Parklands.