

1 August 2023

Nathan Heath  
Senior Planning Officer  
NSW Department of Planning and Environment  
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Dear Nathan,

**Request for Advice: State Significant Infrastructure Modification – Upper South Creek Advanced Water Recycling Centre (SSI-8609189-Mod-2)**

I refer to the Modification Application to the Upper South Creek Advanced Water Recycling Centre (Reference – SSI-8609189-Mod-2).

Thank you for the opportunity to provide comment in response to the proposed realignment of treated water and brine pipelines, including the brine pipeline within Lansdowne Reserve, which is located within the Canterbury Bankstown LGA.

Upon review of the documentation provided, Council raises the following issues in the table below:

Council's comments
<ul style="list-style-type: none"><li>Appendix C - Terrestrial Biodiversity Report states the following: <i>'Indirect impacts have the potential to occur to vegetation mapped within the project's impact assessment area, which encompasses a wider area, generally 12.5 metres either side of the impact area, primarily to allow for design flexibility after the EIS is approved.'</i></li></ul> <p>It is unclear if the impact area identified in Figure 3 (Page 6 of 6) has been mislabelled and should in fact be noted as the 'impact assessment area' or is this report stating that there may be additional clearing, excavation, stockpiling, sedimentation and weed spread up to 12.5m beyond the identified impact area. This extension of range for the project would result in clearance of a significant extent of the BioBank site and further impacts to the Cumberland Plain Woodland Community which would not be supported by Council.</p> <ul style="list-style-type: none"><li>If the impact area identified in Figure 3 (Page 6 of 6) is the area proposed to be directly impacted by the proposal (including clearance, excavation, compaction, stockpiling, etc) this would likely cause direct impacts to the tree protection zones of trees within the BioBank site and additional credit retirement requirements. Council would not be supportive of any direct or indirect impacts to the BioBank site.</li><li>Council seeks clarification on how the fire trail access will be maintained for emergency services vehicles during the proposed works, and how pedestrian access within Lansdowne Reserve will be managed during the proposed works.</li><li>There is a culvert with twin stormwater pipes under the fire trail within the proposed access route. A structural assessment will need to be undertaken to determine the impact of vehicle loadings during construction and ongoing maintenance. The assessment will need to determine if the culvert is structurally adequate for the vehicle loadings, as well as to determine if the loading during the works will reduce the design life of the system. If the culvert is assessed as not being structurally adequate and/or the works will reduce the culverts design life, remediation works to reconstruct or strength the culvert will need to be undertaken. It will also be expected that the structural assessment and pre and post dilapidation reports including CCTV footage of the stormwater system will be forwarded to Council for review.</li></ul>



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- Council must be consulted during the remediation of the site to ensure that the remediation works (vegetation rehabilitation, works on fire trail/s, works required for the bridge culvert, etc) are in accordance with Council standards/requirements.
  - Council as the land manager should be regularly updated on project progression and timeline and any proposed changes to the scope of works in Lansdowne Reserve.
  - Council is to be consulted in respect to the materials used for pavement works to improve and widen the fire trail and for any hard stand areas required during construction. Council would not support the use of road base, blue metal, etc.
  - The land that comprises the site of the compound and the proposed access into Lansdowne Reserve includes both public local roads and freehold lots owned and controlled by Council. Council has provided preliminary agreement to access into the site from Henry Lawson Drive along the existing fire trail however access and occupation arrangements are currently being negotiated by Sydney Water and Council's property teams, and access and occupation of the site will not be available until these negotiations and any subsequent deeds, agreements, licences or similar have been finalised. It is not to be construed that these comments provide an approval or agreement from Council with respect to access into and occupation of Lansdowne Reserve, nor does it identify associated conditions of the proposed access / occupation.
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Should you require any further information, please do not hesitate to contact me at [michaela.newman@cbc.city.nsw.gov.au](mailto:michaela.newman@cbc.city.nsw.gov.au) or 9707 5754.

Yours sincerely

Michaela Newman  
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