

ATTACHMENT 1

City of Ryde Submission

**Greater Parramatta and Olympic Peninsula Water
Resource Recovery Facility by Sydney Water
SSI-74258485**

**Council File reference: COR2024/135/2
Submission Date: 10 March 2026**

EXECUTIVE SUMMARY

Introduction

Thank you for inviting City of Ryde Council to comment on the proposed Water Resource Recovery Facility and ancillary works proposed under the Application.

Specifically, the application involves constructing and operating a new water resource recovery facility (WRRF) and associated infrastructure at Camellia-Rosehill. The WRRF would divert wastewater from the Northern Suburbs Ocean Outfall Sewer (NSOOS) via the Camellia pumping station and produce advanced treated water which would be released locally to the Parramatta River. The WRRF and associated infrastructure together form the Greater Parramatta and Olympic Peninsula (GPOP) Water Cycle Management project (the project). The proposal involves construction of treatment plant and associated structures, over several km of piping work. Wastewater will be released into Paramatta River at several discharge point (one near Meadowbank with piping through Council land).

The plan below shows pipes and discharge point located within Ryde Council Area as shown in the SSI Application.



Figure 1: Affected areas in Ryde/ Meadowbank

While Council acknowledges the strategic need to service growth within the GPOP corridor and manage capacity constraints in the Northern Suburbs Ocean Outfall Sewer network, the proposed alignment through Meadowbank Park presents notable operational and environmental risks.

Given the regional significance and high utilisation of Meadowbank Park, minimising disruption to community recreation and protecting established tree canopy and natural areas should be treated as key project constraints.

Summary of Key Issues

In review of the Environmental Impact Statement (EIS) and supporting documentation several issues have been identified by Council staff. The key issues identified with the SSI Application are summarised below (and detailed later in the submission):

Lack of Details

Application provides limited and conceptual information with demarcation shown on aerial maps, which lacks cadastre level details that is otherwise is required in any Development Application to inform precise location of works and related impacted areas. In addition, there seems to be inconsistent information in the EIS.

Submission seeks clarification regarding details of piping and affected areas in Meadowbank, particularly methodology and nature of pipe installation (trenching and trenchless), with full analysis of site-specific impact on Council managed park as well as any risk to Council.

Impact on Council's Open Space and Parks

The Meadowbank Park and Memorial Park (which is one of Council's highest utilised and regional sporting precincts), with discharge point to be located at John Whitton Bridge, would substantially impact the City of Ryde's open space, community access, and future planning opportunities. Council does not support this route as the preferred option.

Impact of using Council Managed Land

Clarity should be provided around the impact of creating the easement over Council managed land (Pg 71) and the impact this will have on Council's ability to manage the area in accordance with the existing Plan of Management. Further it is not clear if there was adequate consultation with Council for use of Council Managed Parks.

Impact on Trees and Vegetation

Meadowbank Park and surrounding river corridors contain established canopy trees and vegetated areas that contribute significantly to amenity, shade, biodiversity and Council's urban canopy targets. Trenching and work zone through these areas raise concerns regarding impact on these trees.

Impact on River Foreshore

The discharge point forms part of a sensitive riparian and recreational corridor. The water discharge in this area is likely to cause disturbance to riparian vegetation, cause erosion and sedimentation risks during construction and long-term impact to the area.

Impact on Public Domain

Any above ground infrastructure built above charity creek may pose as an obstruction

for debris when the creek is functioning at full capacity. Dilapidation Investigation will be required prior to any work. Proposal may also impact on private driveways and ability to access the parks. Several property owners may not be able to access their properties during construction. There is no information in terms of how this will be managed and notification procedure for the affected individuals.

Traffic and Parking

Given the limited availability of on-street parking in Meadowbank, reliance on on-street parking by construction workers would place significant additional pressure on parking demand in the area.

Works in Flood Prone Areas

The submitted documentation identifies that Compound C28 is located within the 1% AEP flood extent with Flood depths up to 1 m expected in overbank areas with Potential redistribution of flows onto residential properties may occur. However, no quantitative hydraulic assessment has been provided to demonstrate that construction-phase activities will not adversely impact flood behaviour.

Contamination

The project is within a historically contaminated urban catchment. Construction of the river release structure may disturb contaminated sediments, mobilise pollutants, and expose acid sulphate soils resulting in downstream swimming sites and water recreation areas adversely affected. Also, short-term contaminant mobilisation during works remains insufficiently addressed.

Air and Water Quality

There is limited clarity on real time monitoring commitments, trigger action response protocols, controls specific to contaminated and acid sulphate soils, and complaint escalation framework from visual or perceived contamination. Odour and water quality monitoring stations should be provided at strategic locations to allay any community concerns.

Noise

Out-of-hour construction works is proposed, with predicted exceedances in several areas including Meadowbank. Sleep disturbance is also expected at some receivers.

Social Impact

Disruption to the active and passive recreation opportunities for the community caused by the project is understated in the assessment and the mitigation measures are inadequate. Other parks nearby are at capacity so temporary relocation may not be feasible. In addition, the Application seems to imply that the disruption to the community and access to the sporting fields at Meadowbank Park will be 8 months through the construction period of that section of the project. This is an extended period and does not consider the time required for establishment of the area disturbed and reinstated following completion of the works.

The relevant issues with respect to SSI-74258485 have been detailed below:

1. Lack of Details regarding Nature of Work at Meadowbank Park

- a. The Application provides conceptual information with demarcation shown on aerial maps, which lacks cadastre level details that is otherwise required with any Development Application, to inform precise location of works and related impacted areas. It is impossible to ascertain details of the works and proximity to critical service areas based on the broad concept shown in the EIS. Given the lack of details, the applicant should be required to provide additional Civil Drawing with details of the proposal comprising technical, spatial representations of site details, exact location of pipes, boring and trenching, depth, width and proximity from infrastructure such as existing roads, paths, drainage, playground, driveways and so on. The plans should include plan views, cross-sections, and in-ground utility layouts to ensure project accuracy, safety, and adherence to standards.

The current plans are inadequate as shown below:



Figure 2: Concept Shown in SSI Application (lacking details)

- b. It is not clear from the Concept Plan and details annotated on the plan/legend as to where exactly the trenching is proposed adjoining the Meadowbank Park and the HDD launch area. Further, the plans notate all areas as “indicative” areas, for example, “indicative construction compound” next to Meadowbank Park, it shows “indicative compound access. All areas in Meadowbank are shown in red outline which means all piping will be trenching. It is not clear if this will be open trench or what is meant by this methodology of laying pipes. The application states that “Sydney Water would use trenchless methods for construction where possible to avoid unacceptable disruptions to main roads”. Given that this method will not be employed for works in Ryde Council area, does this mean there will be severe impact to the open space, parks, roads and near the bridge. There is contradictory information provided on the summary sheet which indicates that “To address this, concern, a deep horizontal directional drill would be used to travel under Hill Road to Meadowbank Park”. Open trenching may be faster to lay pipes, but this may

cause significant impacts to the Meadowbank sports grounds and the parks.

Council seeks clarification on where and what the method of pipe installation is proposed in each location within the Meadowbank area and if trenching is the only option, how would impact on the Park and associated infrastructure and its use.

- c. Meadowbank Park is identified as a Main Compound (pg 98) and the document states (pg 95) that these types of Compounds are in use for 36mths (duration of project). On pg 95 it indicates the area will be utilised for 8 months. This matter requires clarification and more specific details need to be provided.
- d. Further clarification needs to be provided about the impact on street parking and access to the area around John Whitton Bridge and the timeframe of this impact. Will these areas be required for construction activities outside of the construction timeline indicated on Pg 50.
- e. Clarification needs to be provided on how the pipeline will be accessed for maintenance activities following completion of construction.
- f. The area in Meadowbank is affected by the Viva Pipeline. It is not clear from the Application whether Sydney Water has considered the VIVA gas pipeline and how the proposed works may conflict with the pipes.
- g. Works are shown to be located within Council managed land and there is no indication of consultation with Council with respect to these works and how owners consent requirement will be met.
- h. The application does not specify the duration of works and how this will impact on Park closure and ways to minimise and manage this given that the Park is extensively utilized by Schools and community groups through out the year (refer to item 2 below as well)
- i. Recycled Water Offtakes – Clarification Required
The EIS contains contradictory statements regarding recycled water offtakes:
 - *Reference 1:* “As part of this project, Sydney Water has proposed recycled water offtakes along the river release pipeline in consultation with local councils and other recycled water users. The location of these offtakes would be confirmed during detailed design.” (p. 10),
 - *Reference 2:* “Pipeline offtakes for secondary uses of treated water do not form part of this project and would be subject to separate approvals and assessment (if required).” (p. 62)

Council seeks clarification on the approval process for future offtakes and requests that Sydney Water, along with any potential secondary users, consult with Council during the design of any future recycled water offtake proposals.

2. Impact on Council’s Open Space and Parks

The proposed River Release Pipeline through Meadowbank Park and Memorial Park, with discharge point to be located at John Whitton Bridge, would substantially impact the City of Ryde’s open space, community access, and future planning opportunities. Council

does not support this route as the preferred option.

The early engagement has been valuable in identifying potential constraints within Meadowbank and surrounding open space areas. Notwithstanding this consultation, the proposal presents several significant operational and environmental considerations for Council's Parks & Sportsgrounds. The following specific issues are raised with respect to impact of the Council's Open Space and Parks:

a. Impact to Meadowbank Park – Sportsground Operations & User Groups

The primary area of concern is the proposed pipeline alignment through Meadowbank Park and adjoining open space, with discharge infrastructure near John Witton Bridge.

Meadowbank Park is one of Council's highest utilised and regional sporting precincts. It accommodates multiple winter and summer sports, used by several schools and community groups for informal recreation and major events. The park currently experiences high levels of programmed use, with limited recovery periods for natural turf surfaces.

Key concerns include:

- Loss of access to sports fields and open space during construction, potentially across multiple seasons.
- Limited capacity to relocate user groups, as most sportsgrounds across the LGA are operating at or near capacity.
- Disruption to competitions, training and community programs.
- Impacts to associated infrastructure including amenities, car parking, shared paths and spectator areas.
- Reputational risk where user groups experience reduced availability or compromised surface quality.

Given the constrained recovery windows for turf surfaces, any trenching, stockpiling, heavy vehicle access or temporary construction compounds will likely have medium to long-term implications for turf performance, drainage and playability. Full reinstatement to Council specification, including appropriate grow-in periods prior to return to play, will be essential.

A detailed Construction Plan should:

- Commit to defined turf reinstatement standards and independent certification.
- Allow adequate rehabilitation timeframes before fields are handed back.
- Consider compensation or mitigation mechanisms where seasonal impacts are unavoidable.

b. Tree Protection Zones (TPZ) & Vegetation Impacts

Meadowbank Park and surrounding river corridors contain established canopy trees and vegetated areas that contribute significantly to amenity, shade, biodiversity and Council's urban canopy targets.

Pipeline works through these areas raise concerns regarding:

- Encroachment into Tree Protection Zones (TPZs).
- Root disturbance from trenching.
- Soil compaction from plant and heavy vehicle movements.
- Potential long-term tree decline from indirect root damage.
- Removal of mature canopy trees.

Any works within TPZs must:

- Be supported by detailed Arboricultural Impact Assessments.
- Include independent project arborist supervision.
- Minimise tree removal wherever possible.
- Provide like-for-like or enhanced canopy replacement outcomes where removal is unavoidable.

Protection of established canopy within Meadowbank is a critical consideration given its recreational and environmental value.

c. Natural Areas & River Corridor

The Parramatta River foreshore areas near the discharge point form part of a sensitive riparian and recreational corridor.

Potential impacts include:

- Disturbance to riparian vegetation.
- Erosion and sedimentation risks during construction.
- Impacts to shared pathways and informal recreation areas.
- Long-term implications of treated water discharge infrastructure within Council-managed land.

Strong erosion and sediment control measures, rehabilitation commitments and clear delineation of ongoing maintenance responsibilities will be required.

d. Impact of creating the easement over Council managed land

Clarity should be provided around the impact of creating the easement over Council managed land (Pg 71) and the impact this will have on Council's ability to manage the area in accordance with the existing Plan of Management. Confirmation of what approvals are being used for to facilitate this outcome and whether a Council resolution is required for the creation of this easement should also be obtained.

e. Funding to Compensate for Temporary Loss of Open Space Access

Should the proposal proceed, Sydney Water must ensure that all impacts on Meadowbank Park and Memorial Park are minimised, managed, and fully rectified in consultation with Council. In addition, Council requires that a condition of consent be imposed to secure funding for maintenance and upgrades to surrounding open space areas to compensate the community for the temporary loss of access.

f. Bridge-Style Aerial Crossings in Meadowbank Park

The proposed bridge-style aerial crossings over Charity Creek must not compromise future opportunities to naturalise this waterway. Council expects Sydney Water to design and locate these structures in a manner that preserves long-term environmental and place-making outcomes.

g. Barometric Loop and Memorial Park Toilet Block

The EIS proposes an 8-metre-high barometric loop to be incorporated into, co-located with, or placed adjacent to the existing toilet block in Memorial Park (EIS, p. 80). Council requires that this infrastructure be co-designed with Council and that it includes the upgrade or full replacement of the existing toilet block as part of the project.

3. Impact on Public Domain

- a. Obstruction:** Any aboveground infrastructure built above charity creek needs to be developed above the 1%AEP flood level. The proposed structure may pose as an obstruction for debris when the creek is functioning at full capacity.

Where pipelines would cross the minor waterways of Charity Creek and unnamed creek in Meadowbank Park, aerial (i.e. above ground) pipeline crossings would be constructed in line with existing gas pipeline infrastructure. The above ground pipeline would be fully concrete encased, with any valves located in a secured cage to prevent unauthorised access. The design would be developed further during detailed design in consultation with the City of Ryde Council.

b. Pre-Construction Dilapidation Report:

To ensure Council's infrastructure is adequately protected a pre-construction dilapidation report on the existing public infrastructure in the vicinity of the proposed development and along the travel routes of all construction vehicles, up to 100m, either side of the development site, is to be submitted to Council. The report shall detail, but not be limited to, the location, description and photographic record (in colour) of any observable defects to the following infrastructure where applicable.

- Road pavement,
- Kerb and gutter,
- Footpath,
- Drainage pits,
- Traffic signs, and
- Any other relevant infrastructure.

The report is to be dated and submitted to, and approved by Council's City Infrastructure Directorate, prior to any work commencing, should the application be approved.

c. Properties requiring driveway closure:

For section within the City of Ryde where property driveways will be restricted, written notification must be provided to the adjoining owners and occupiers of the utility works, with a minimum of two weeks prior to commencement of

construction. The notice is to include a contact name and number should they have any enquiries in relation to the construction works. The duration of any interference to neighbouring driveways must be minimised; and driveways must be returned to the operational condition as they were prior to the commencement of works, at no cost to the adjoining owners.

4. Traffic and Transport Impact

- a.** Council has not been adequately consulted in regard to the several activities and work that are proposed under the proposed application, many of which are likely to have significant impact on the residents, schools and road users. Details of these activities have not been discussed with Council.

The following issues are raised:

- i.** Table 7.14 of the TTIA report indicates that a section of Meadow Crescent is proposed to be closed during the relevant stage of the construction works. The applicant will be required to obtain the appropriate road activity permits for any work affecting local roads within the City of Ryde LGA during the construction phase of the project.
- ii.** Section 6.8.3 of the TTIA report states that, during the construction phase, light and heavy vehicles will travel to and from Victoria Road via Adelaide Street and Constitution Road to access the relevant sections of the project within the City of Ryde LGA. The applicant will be required to submit a Construction Pedestrian and Traffic Management Plan (CPTMP) to the satisfaction of Council's Traffic Services Department.

Truck movements are to be restricted to outside weekday commuter peak periods (7:00 am–9:00 am and 4:00 pm–6:00 pm) to minimise impacts on local roads. Where feasible, nominated truck routes are to utilise State roads or routes that are not designated as local light vehicle thoroughfares.

- iii.** Table 7.14 of the TTIA report indicates that the construction workforce is expected to utilise nearby on-street parking. However, the report also states that approximately 34 on-street parking spaces on Meadow Crescent and a further 28 spaces within the City of Ryde LGA would be removed as a result of the construction works.

Given the limited availability of on-street parking on local roads in Meadowbank, reliance on on-street parking by construction workers would place significant additional pressure on parking demand in the area. Accordingly, it is recommended that the applicant investigate the use of nearby vacant land for construction worker parking. If such parking is located some distance from the site, a shuttle bus service should be considered to transport workers to and from the construction site.

- iv.** The EIS report indicates that the construction phase of the project is anticipated to occur between Q3 2028 and Q4 2031. It is noted that Council has planned construction works within Meadowbank Park. The

applicant will be required to consider any concurrent works in Meadowbank Park, should timeframes overlap, to minimise cumulative construction impacts.

- v. The Traffic and Transport Impact Assessment (Council Ref. D26/16954) page 111, identified several residential driveways located along Bank Street will be affected and owners/occupiers will be unable to access their properties. Council will require the lead contractor to provide minimum 2 weeks notification to effected property owners, prior to works commencing.

Impacts to property access	The following driveways at these properties would potentially be impacted due to the pipeline works: 1-3 Bank Street, Meadowbank to 13 Bank Street, Meadowbank Notably, these construction works would occur for a short duration of time (approximately 1 to 2 months) and construction workers would be advised not to impede driveways at these locations. Residents would be advised of these construction works and its temporary duration. During these works, residents can utilise on-street parking opportunities at Meadow Crescent and Bank Street.
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5. Flooding & Drainage Issues

The Flood Assessment identifies that construction compounds (C28) is located within the 1% AEP flood extent and major overland flow paths, including Small Creek and Charity Creek crossings. The assessment states that potential redistribution of flows may occur, however no quantitative modelling of construction-phase impacts has been provided.

Given the sensitivity of the Parramatta River floodplain and proximity to residential properties, Council recommends precautionary controls.

Please see Council Flood map below for your reference:

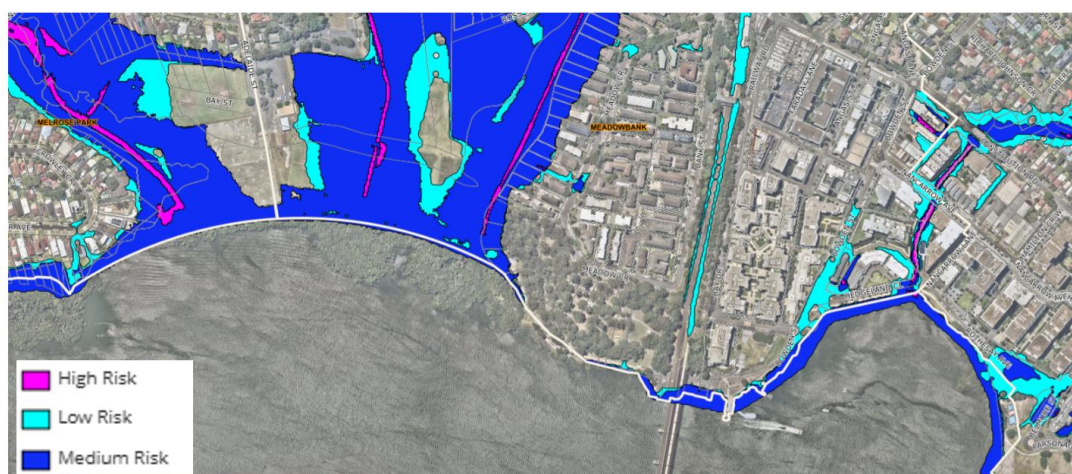


Figure 3: Flood Map



Figure 4: Work Zone (EIS)

Flood Assessment Report

Construction work area	Construction ancillary facilities / other areas	Flood Threshold ²	Proposed construction activities ²					Description of existing flood behaviour	Potential impacts of construction activities on flood behaviour without mitigation
			Site facilities ³	Material storage and stockpiling ³	Earthworks/Pipe works ³	Barometric loop	Other		
Construction Compounds	C21	PMF			✓			Flood depths to 1.7 m in PMF mainstream flood. Located in local overland flow path in Derby Street (modelling of overland flooding not available).	Minimal impacts to mainstream flooding expected. Potential to obstruct local overland flood flows with redistribution of flows onto adjacent properties resulting in potential increases in flood depths or new areas of flooding.
Construction Compounds	C22	Minor events	✓	✓				Site is located within major overland flow path with trunk drainage channel passing through site. Overland flood modelling not available. Affected by mainstream PMF event with depths exceeding 2 m.	Potential of material flood impacts to adjacent properties due to obstruction and redirection of major overland flows resulting in potential increases in flood depths or new areas of flooding.
Construction Compounds	C23	PMF	✓	✓				Fringe flooding in mainstream PMF event with depths to 0.3 m.	Minimal flood impacts likely.
Construction Compounds	C24	Minor events	✓	✓				Site is located within major overland flow path with trunk drainage channel passing through site. Overland flood modelling not available. Affected by mainstream PMF event with depths exceeding 1 m.	Potential of material flood impacts to adjacent properties due to obstruction and redirection of major overland flows resulting in potential increases in flood depths or new areas of flooding.
Construction Compounds	C25	Nil		✓	✓			Outside of available modelling area but located on high ground. Not expected to be affected by flooding.	No flood impacts expected.
Construction Compounds	C26	PMF7		✓	✓			Outside of mapped 1% AEP flood extent. May be affected by PMF fringe flooding from Haslams Creek although flood mapping not publicly available.	Minimal flood impacts likely.
Construction Compounds	C27	PMF7	✓	✓	✓			Local flooding/stormwater in 1% AEP event possible. May be affected by PMF fringe flooding from Haslams Creek although flood mapping not publicly available.	Minimal flood impacts likely.
Construction Compounds	C28	1% AEP	✓	✓	✓			Flood depths in 1% AEP event to 1 m in overbank areas. Site includes crossing of Smalls Creek and Charity Creek.	Potential flood impacts due to blockage of flows at Smalls Creek and Charity Creek crossings with trench pipeline laying method. Flood impacts and redistribution of flow onto residential properties along Charity Creek resulting in potential increases in flood depths or new areas of flooding.

Figure 5: Flood Assessment and Compounds

The submitted documentation identifies that Compound C28 is located within the 1% AEP flood extent with Flood depths up to 1 m expected in overbank areas with Potential redistribution of flows onto residential properties may occur. However, no quantitative hydraulic assessment has been provided to demonstrate that construction-phase activities will not adversely impact flood behaviour. In accordance with NSW Floodplain Development Manual (2023) which requires development to avoid adverse flood impacts and not increase risk to surrounding properties, Council requests the following:

1. Construction-Phase Hydraulic Assessment including:
 - A hydraulic assessment quantifying construction-phase flood impacts for the 1% AEP and PMF events, including flood depth changes,

velocity changes, afflux mapping and hazard classification and identification of any adverse flood impact to private properties

2. Precautionary mitigation measures must be identified where impacts are predicted.
3. Detailed Construction Methodology for C28 including:
 - Temporary creek crossing design and hydraulic capacity
 - Stockpile heights, volumes and locations
 - Compound finished surface levels (RLs)
 - Temporary bunding and flood protection measures
4. Construction Flood Emergency Management Plan addressing:
 - Rainfall and flood trigger thresholds
 - Cease-work criteria
 - Evacuation procedures
 - Plant and stockpile relocation protocols
 - Rapid demobilisation measures
5. Preventative flood risk controls to be explored and incorporated including:
 - No permanent fill within floodplain
 - Temporary fill to be minimised and removed prior to significant rainfall events
 - Demonstrate no loss of flood storage during construction
 - Scour protection and sediment and erosion control measures, as applicable.
 - No stockpiling within primary flow corridors
6. Construction compounds within flood-prone land shall incorporate the following measures:
 - Site sheds to be located outside 1% AEP where practicable
 - storage of the material above 1% AEP flood level
 - No hazardous material storage within flood-prone areas
 - Usage of relocatable/ non-permanent site structures
7. All existing Council drainage infrastructure is to be identified and accurately located on site. Works must ensure no damage occurs to Council drainage assets, and no permanent structures are to be constructed over or within Council drainage infrastructure and easements.

Restoration Requirement

- All temporary works, crossings, stockpiles and fill to be fully removed
- Floodplain to be restored to pre-construction levels

6. Environmental Health Issues

a. Contamination

The project is within a historically contaminated urban catchment. Construction of the river release structure may disturb contaminated sediments, mobilise pollutants, and expose acid sulphate soils. The application does not clearly

demonstrate how downstream swimming sites will be protected during construction, whether exclusion zones will be implemented, and how cumulative events (construction disturbance + storm + overflow) will be managed. Short term contaminant mobilisation during works remains insufficiently addressed.

b. Air quality

Construction dust mitigation is broadly proposed, however there is limited clarity on real time monitoring commitments, trigger action response protocols, controls specific to contaminated and acid sulphate soils, and complaint escalation framework. For operation, odour monitoring and cumulative impact assessment (given nearby industrial activities and precinct redevelopment) require further clarification.

c. Noise

Out-of-hour construction works is proposed, with predicted exceedances in several areas including Meadowbank. Sleep disturbance is also expected at some receivers. The duration and management of extended out-of-hours works, and the cumulative impacts with other major infrastructure projects, require stronger justification and mitigation detail.

d. Water quality

- i. Incomplete detail on advanced treatment design: The application references primary, secondary, tertiary and reverse osmosis (RO) treatment but provides limited detail on e.g., the full process flow diagram, combined pathogen log reduction values, RO integrity monitoring and shutdown logic, and duration limits for tertiary discharge mode.
- ii. Worst case scenario modelling: When RO is offline (modelled at ~2 days twice per year), tertiary-treated water may be discharged with higher pathogen and nutrient levels. The cumulative scenario of storm event + wet weather overflow + WRRF discharge + RO offline mode has not been clearly stress-tested. This presents uncertainty around short term microbial risk at downstream swim sites.
- iii. Pollutant characterisation: While modelling has been undertaken for the Meadowbank discharge location, the discharge contaminant profile appears largely based on St Marys AWRP data. It remains unclear whether influent wastewater specific to the North Head system has been fully characterised, including trace metals, PFAS, pharmaceuticals and industrial legacy contaminants. Further clarification is required to confirm that the proposed advanced treatment train achieves sufficient removal efficiencies for contaminants specific to this project.
- iv. Proximity to existing and planned swimming sites: Downstream recreational areas include active swim sites (Cabarita Beach) and planned swim sites (Putney Park and McIlwaine Park) (1.5-3.5km from discharge) aligned with the Parramatta River swimmable objective. Given tidal influences and potential low-flow conditions, plume persistence and

short term exposure windows are plausible. The following are not clearly defined which creates uncertainty around swimmer protection during episodic water quality deterioration:

- a. Real time monitoring framework
- b. Public health trigger thresholds
- c. Recreational advisory protocols
- d. Community notification system

7. Biodiversity Assessment

The application seems to indicate impacts of the GPOP Water Cycle Management Project on aquatic biodiversity will be acceptable provided that all proposed mitigation and management measures are implemented effectively.

However, there are a range of construction impacts that will permanently alter existing aquatic habitats such as open trenching, riverbank excavation and installation of pipelines and diffusers. All efforts should be made to rehabilitate disturbed banks and seawalls with appropriate landscaping and habitat features, including the use of complex sandstone block arrangements and riparian planting as per 'A Guide to Improving the Environmental Value of Seawalls and Seawall-lined Foreshores in Estuaries' (OEH 2012). Where possible, innovative habitat enhancement features such as artificial reefs and living seawalls should be incorporated to further support aquatic biodiversity.

8. Social Impact Assessment

The following matters are raised for consideration:

- Section 6.3.6 Disruption to the active and passive recreation opportunities for the community caused by the project is understated in the assessment and the mitigation committed to is underwhelming. It is suggested that park users will be able to be relocated to other parks for their sporting activities when the reality is that Council has identified these other parks operating at capacity.
- The Ryde Riverwalk is an important active transport and passive recreation route; it is unclear what impact the projects works will have on use of this pathway through the construction period. It should be confirmed whether ongoing access will be maintained through the construction period and any times this may not be possible to do so need to occur outside of periods of high use.
- Outlines that the disruption to the community and access to the sporting fields at Meadowbank Park will be 8 months through the construction period of that section of the project. This does not consider the time required for establishment of the area disturbed and reinstated following completion of the works and use of the area as a compound. This could result in the area being unavailable to the community for a period of up to a further 6 months (depended on the time of year) that works are undertaken.
- The report does not consider that impact to part of the sporting fields on Meadowbank Park may require remediation works to supporting infrastructure such as irrigation and drainage. This could significantly impact the extent of the works required to get the sportsground(s) back to its previous condition and

available for play; and therefore be of greater disruption to community use of the space.

- Table 6.12 indicates that the mitigation of the disruptive impact of the community (identified as high) following mitigation is moderate. Mitigation proposed is the provision of 2 x water bubblers in a location to be specified and further discussion with Council on opportunities to provide infrastructure. Noting the significant disruption created by this project, there is an opportunity to create further goodwill to the community by committing to the delivery of other improvements in line with Council's long-term plans for the area.

Conclusion

City of Ryde Council, thanks the Department for providing Council the opportunity to comment on the proposed SSI Application.

In the Application's current form, a significant number of issues remain unresolved, and Council requests these issues be addressed by the Applicant before the application proceeds further.

While Council recognises the strategic importance of the WRRF. The Application has not provided adequate details for Council to lend its support for the proposal. The preferred River Release Pipeline route through Meadowbank Park and Memorial Park is not supported due to its significant impacts on the City of Ryde, particularly the Meadowbank Park area. Should the project proceed, Council expects Sydney Water to work collaboratively to minimise impacts, provide appropriate compensation, and ensure that all associated infrastructure is designed to support long term community and environmental outcomes.

It is recommended that the application be amended to address these issues and additional information be made available for Council to review the matter again before the application proceeds any further.

- End of Advice -