Department of Climate Change, Energy, the Environment and Water

Your ref: SSI-74258485
Our ref: DOC26/85781

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4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

13 March 2026

Subject: Environmental Impact Statement – Greater Parramatta, Olympic Peninsula (GPOP) Water Cycle (SSI-74258485) (City of Ryde, City of Parramatta, City of Canada Bay)

Dear Daniel,

Thank you for your referral received 11 February 2026, requesting advice from the Conservation Programs, Heritage and Regulation (CPHR) Group and NSW National Parks and Wildlife Service (NPWS) of the NSW Department of Climate Change, Energy the Environment and Water on the above State significant infrastructure (SSI) project.

CPHR in consultation with NPWS, has reviewed the *Environmental Impact Statement* (EIS) (Sydney Water, 6 February 2026) and accompanying technical reports and provides its comments and recommendations at Attachment A. Please note there are no comments regarding NPWS Estate. In summary, CPHR:

Biodiversity

- supports that the serious and irreversible impacts (SAII) assessment for the Curlew Sandpiper (*Calidris ferruginea*) and considers that the project does not trigger SAII for this species
- notes that the proposed avoidance measures for vegetation removal in the Biodiversity Development Assessment Report (BDAR) and EIS have not been adequately addressed
- advises that not all required biodiversity spatial data has been provided and this data must be submitted via the Biodiversity Offsets and Agreement Management System (BOAMS)

Flooding

- the Flood Assessment Report (FAR) does not adequately assess the cumulative flood impacts associated with filling the Camelia-Rosehill Water Resource Recovery Facility (WRRF) site
- the FAR must include flood impact mapping for both the design case and climate change scenarios
- the assessment of flood impacts on nearby private properties resulting from the proposed aerial pipe crossings over Smalls Creek and Charity Creek is inadequate
- additional information and mapping are required to understand what flood event the Camellia Pumping Station first floods

- the assessment of construction-related flood impacts does not provide sufficient detail on mitigation measures to protect adjacent private properties, and this information should be provided prior to determination.

Should you have any queries regarding this matter, please contact the Central Metropolitan Planning team at rog.gsrplanning@environment.nsw.gov.au.

Yours sincerely,

S. Harrison

Susan Harrison
Senior Team Leader, Central Metropolitan
Conservation Planning and Assessment
Conservation Programs, Heritage and Regulation Group

Attachment A

CPHR comments on the Environmental Impact Statement – Greater Parramatta, Olympic Peninsula (GPOP) Water Cycle (SSI-74258485)

Documents Reviewed

CPHR has reviewed the following reports:

- Greater Parramatta and Olympic Peninsula Water Cycle Management Environmental Impact Statement (Sydney Water, 6 February 2026) (EIS)
- Appendix A-E (Sydney Water, not dated)
- Appendix H - Aquatic Biodiversity Impact Assessment (Stantec, 16 January 2026)
- Appendix I - Flood Assessment Report (Jacobs, 3 February 2026) (FAR)
- Appendix L - Biodiversity Development Assessment Report (Arcadis, 16 January 2026) (BDAR)
- Appendix R - Place and Design Framework (GHD, 3 October 2025).

Biodiversity

Serious and Irreversible Impacts

The Biodiversity Development Assessment Report (BDAR) identifies that the proposed river release pipeline to the Parramatta River, adjacent to the Memorial Park in Meadowbank, is located within an area mapped on the Important Habitat Map (IHM) for the Curlew Sandpiper (*Calidris ferruginea*). The BDAR assumes species presence based on the indicative Parramatta River construction area being located within the IHM area for this species. The Curlew Sandpiper is listed as critically endangered and as a Serious and Irreversible Impact (SAII) entity under the *Biodiversity Conservation Act 2016* (BC Act).

CPHR supports the proponent's SAII assessment for the Curlew Sandpiper and considers this SSI application does not trigger SAII for this species. Anticipated impacts on this species are expected to be minimal, temporary and largely confined to open-water areas. In addition, impacts on potential foraging habitat are expected to be negligible, as these areas will be largely avoided. Further detail on CPHR's advice regarding the SAII assessment for the Curlew Sandpiper is provided in Attachment B.

Other key assessment issues

Following review of the BDAR, CPHR advises that:

- the proposed avoidance measures for vegetation removal have not been adequately addressed in the SSI application
- required spatial data has not been fully provided.

These issues are provided in further detail below, along with the recommended actions and the stage at which each should be addressed.

1.	*Arboricultural Impact Assessment (AIA)*	The BDAR and EIS estimate that approximately 4.97ha of native vegetation would be removed, comprising 4.78ha of planted native vegetation and 0.18ha of plant community type (PCT) vegetation. Although both documents describe the extent of vegetation removal as conservative and mitigation measures would be used to avoid vegetation impacts where possible, CPHR notes that these avoidance measures are not clearly defined for this SSI application. CPHR is concerned that, if approved, the SSI may permit clearing of up to 4.97ha of native vegetation without any enforceable requirement to minimise vegetation loss within the proposed development footprint. The extent of non-native vegetation removal is also unclear. While the BDAR is not required to provide a detailed assessment of non-native vegetation and is limited to consideration of habitat impacts for threatened species or ecological communities, CPHR advises that

		much of the non-native vegetation within the development footprint consists of street trees and planted park trees that are likely to provide habitat and amenity values. CPHR therefore requests further information demonstrating how tree loss, both native and non-native, will be minimised, through the submission of a due diligence Arboricultural Impact Assessment (AIA). An AIA will strengthen the avoid and minimise requirements under the BC Act and Biodiversity Assessment Method (2020) (BAM) and support the protection of biodiversity values. Some pipelines will be installed underground via Horizontal Directional Drilling (HDD), typically at considerable depth. However, shallow drilling may be required in some locations. CPHR advise shallow drilling should be at least 600mm deep in accordance with Australian Standard 4970:2025 Protection of trees on development sites, (AS4970:2025) to avoid adverse impacts on trees. Construction and excavation works are proposed at several locations, including: • HDD launch and receival pits • open trench excavation to lay pipes • barometric loops and above-ground crossings of minor waterways • maintenance holes • valve pits and covers • river release pipeline works • construction compounds • new structures for example proposed switchboards at the Camellia pumping station. **Recommended actions:** • Submit an Arboricultural Impact Assessment (AIA) that: ○ is prepared by an Australian Qualification Framework Level 5 arborist in accordance with AS 4970–2025 ○ identifies trees with a Notional Root Zone (NRZ) extending into the development footprint ○ reviews and references all relevant design plans ○ demonstrates how viable tree retention has been maximised through the design process ○ specifies tree pruning requirements in accordance with AS 4373–2007: Pruning of amenity trees ○ demonstrates how retained trees will remain viable, including detailed protection specifications ○ includes a dedicated ‘Tree Protection Specifications’ section outlining tree- and site-specific protection measures in accordance with Sections 1.3.21 and 2.2.6 of AS 4970–2025 ○ includes a ‘Tree Protection Plan’ (TPP) prepared in accordance with Sections 1.3.20 and 2.2.6 of AS 4970–2025. • All relevant design plans are to be updated in consultation with the arborist to maximise viable tree retention.
	Extent and Timing	Response to Submissions

2.	*BDAR spatial data*	CPHR has received a subset of spatial data associated with the BDAR, however, not all required spatial data has been provided. **Recommended action:** Submit all required spatial data in accordance with Appendix K in the BAM (2020) via Biodiversity Offsets and Agreement Management System (BOAMS).
	Extent and Timing	Response to Submissions

Flooding

A review of the Flood Assessment Report (FAR) has identified several gaps that require further clarification or revision to ensure the assessment accurately reflects the potential flood impacts associated with the proposed development. The documentation provided does not adequately address cumulative flood impacts at Camelia-Rosehill Water Resource Recovery Facility (WRRF), flood behaviour under different design and climate change-adjusted scenarios, or flood risks during construction. In addition, several flood mapping components and mitigation strategies remain incomplete or absent, limiting the ability of CPHR to assess how the proposed development will influence local flood conditions, nearby assets and surrounding properties.

The table below outlines each identified issue, the stage at which the matter should be addressed, and the recommended actions needed to be included in a revised FAR.

Key assessment issues

3.	*Cumulative impacts of Camelia-Rosehill WRRF site*	The FAR states that the proponent intends to fill and regrade the surface of the Camelia-Rosehill WRRF site. This work was previously assessed under a separate planning pathway, through the Review of Environmental Factors for Site Environmental Management Works, Camellia (Sydney Water, October 2024) (October 2024 REF). The FAR has also assumes partial filling of the existing site topography due to a reduced project footprint following determination of the October 2024 REF, consistent with the Amendment REF currently being prepared by Sydney Water The *Parramatta River Flood Study* (Stantec, 13 June 2024) identifies the WRRF site as providing flood storage (prior to filling) during the 20% Annual Exceedance Probability (AEP) event. The FAR states that the October 2024 REF demonstrated significant flood impacts to neighbouring properties during the probable maximum flood (PMF) as a result of filling the WRRF site. CPHR previously requested that Sydney Water model a scenario using the pre-fill site topography as a base case and compare it with the design case to demonstrate the total impact of the site on flood behaviour. This analysis is not included in the FAR. CPHR advises that cumulative impacts must be considered in accordance with the *Flood Risk Management Manual*. The Department of Planning, Housing and Infrastructure (DPHI) should be aware of the combined effects of site filling under both the October 2024 REF and the Amended REF (if determined) when assessing this SSI. Further, CPHR also notes that Sydney Metro West has contributed to increased flood levels during the PMF event and DPHI should consider these broader cumulative changes to flood behaviour as part of its assessment. **Recommended actions:** • Revise the FAR to include flood mapping of the WWRF site prior to filling from the October 2024 REF flood assessment and

		provide flood impact mapping comparing this scenario with the design case. • If the Amendment REF has been determined, revise the FAR to also include flood mapping of the condensed WWRF site footprint prior to filling and include flood impact mapping of the design case compared to this prior filling scenario.
	Extent and Timing	Response to Submissions

4.	*Design case flood and climate change mapping not provided*	Appendix D of the FAR only contains flood impact mapping. CPHR advises that the design case flood mapping should also be included in the FAR. Furthermore, mapping of flood behaviour in climate change scenarios should be provided in accordance with the Flood Risk Management Manual and NSW Flood Prone Land Policy. **Recommended action:** Revise the FAR to include both the design case and climate change results.
	Extent and Timing	Response to Submissions

5.	*Impacts of aerial pipe crossings not adequately described*	The FAR identifies potential impacts of the proposed aerial pipe crossings on Smalls Creek and Charity Creek as minor and suggests they be addressed during detailed design. It also notes a footbridge is located at the Smalls Creek crossing, and this location is also surrounded by open space. However, the Charity Creek crossing is immediately adjacent to residential properties, and the FAR identifies that the proposed aerial pipe crossing may affect yards, lobby areas and garages of these properties. CPHR advises that these impacts should not be regarded as minor, and that appropriate mitigation measures must be incorporated to prevent adverse impacts to private property. **Recommended action:** Revise the FAR to include mitigation measures that prevent adverse flood impacts on private property due to the proposed aerial crossing of Charity Creek.
	Extent and Timing	Response to Submissions

6.	*Camellia Pumping Station*	The FAR includes the PMF flood extent map at the Camelia Pumping Station. However, no mapping has been provided for other flood events. CPHR requests that the FAR include mapping for the other flood events, along with further details of the flood event at which this site first becomes flooded. The Camellia Pumping Station site is shown to flood in both 1% AEP, including climate change scenarios, but the depths have not been provided. If the proposed development will impact adjacent property in the 1% AEP including climate change scenarios, CPHR advises that flood mitigation may be required.

		Recommended action: Revise the FAR to identify which event/s the Camellia Pumping Station first floods and provide mapping that illustrates flood behaviour, including flood depth and velocity.
	Extent and Timing	Response to Submissions

7.	*Management of construction flood impacts*	*Section 8 - Construction phase flood impact assessment* of the FAR identifies the potential impacts of construction activities on flood behaviour. It identifies that some proposed site compounds are located in areas that experience flooding as frequently as the 20% AEP event, resulting in potential impacts on private properties. CPHR advises that mitigation strategies must be developed for any site compound shown to cause flooding of private property during the 20% AEP or more frequent events. As CPHR does not have a post-approval role in document review, the proposed flood mitigation strategies must be provided at the Response to Submissions stage, prior to determination. **Recommended action:** Provide mitigation strategies in a revised FAR to address the flood impacts associated construction activities and site compounds where impacts to private property are identified to occur in the 20% AEP event (or more frequently).
	Extent and Timing	Response to Submissions

Serious and Irreversible Impacts (SAII) – CPHR advice on SAII Entities

A current list of SAII entities is available on the DCCEEW website: https://www2.environment.nsw.gov.au/topics/animals-and-plants/biodiversity-offsets-scheme/clear-and-develop-land/serious-irreversible-impacts

SAII Entity: Curlew Sandpiper (*Calidris ferruginea*)

	Steps	CPHR Recommendation
1	Identify relevant entities at risk of SAII	The Curlew Sandpiper (*Calidris ferruginea*) is the only SAII entity identified as proposed to be impacted. The *Biodiversity Development Assessment Report* (Arcadis, 16 January 2026) (BDAR) has correctly identified this species. CPHR advises that there are no issues with the SAII assessment undertaken within the BDAR.
2	Evaluation of the current extinction risk of the impacted entities	Principle 1 Species or ecological community currently in a rapid rate of decline, applies to the Curlew Sandpiper.
3	Detail measures taken to avoid impacts on the entity	Proposed impacts to the habitat for this species will be minimal as stated in Table 11-4 of the BDAR (page 207): *Of the areas of IHM* [Important Habitat Map] *in the indicative construction footprint, the area of potential foraging habitat on the eastern side of the rail bridge will largely be avoided by the project. Impacts to the shoreline will be restricted to the western side of the rail bridge, which consists of a sandstone wall and does not offer any potential foraging habitat for this species*.
4	Evaluate the impacts from the proposal	The impacts to this species will be minimal, temporary and mostly located within open water. Section 3 of the BDAR (page 206) provides further details, including: *All impacts to IHM will be temporary. Construction in this area will involve removal of a wall west of the John Whitton Bridge, construction of a coffer dam and installation of river release pipes. The wall will be reinstated following installation of pipes. None of the construction involving installation of the river release pipes will directly impact the small strip of sand to the east of John Whitton Bridge.* *There will be barges and other marine equipment during construction which may take several weekends within the water and approximate 12 months on land. However, as has been noted (Section 9.1.5), the current use of the river is dominated by ferry and other maritime traffic, and existing potential for the Curlew Sandpiper to utilise the internal areas of the river for dispersal is unlikely.*

	Steps	CPHR Recommendation
5	Provide advice on whether the proposal is **likely** or **unlikely** to result in SAII	CPHR advises that the proposed development is unlikely a SAII as there is no real chance, as opposed to being more probable than not, that it would be a significant contributor to the species becoming extinct.
Other Recommendations/Comments		
6	Not applicable	

End of Submission