

Hi Rodger,

Thank you for the opportunity to review and provide comments on the Open Water Surf Facility Modification Application to SSD-7942. In particular I welcome this opportunity because we weren't able to provide comments on the first application.

The Centre for Population Health does not have any objections to the proposal or the proposed modification but have I included some comments below in regard to water quality design implications for consideration by the proponent.

In regard to Sec 6.7 Water Quality in the Statement of Support for Section 4.55(2) Modification Application to SSD-7942 - the proponent will need to ensure that the facilities located within the surf park are designed so that they can be maintained in accordance with the Public Health Act 2010 and Regulation 2012 requirements for public swimming pools. Water chemistry and disinfection requirements for public swimming pools are listed in Schedule 1 of the Public Health Regulation 2012.

These requirements are extended not just to the wave pool lagoon but also to the rock pool (dependent on design/depth/water source), toddler pool, hot tub and splash zone along the south-eastern edge of the lagoon beach (as mentioned in 3.1.3 Modifications to the Lagoon and adjacent facilities.

It is strongly recommended that each 'pool' has its own separate circulation and disinfection system and that there is a connection to sewer for disposal of backwash water or other waste water in accordance with Sydney Water trade waste requirements.

I also note that there is a mention of the relocation of rainwater tanks. I'm unclear on what the proposed usage for the rainwater collected on site is however NSW Health recommends that rainwater should not be used for topping up public swimming pools and that within Sydney, the Sydney Water (town water), supply should only be used for this purpose.

If rainwater or a recycled water source is proposed to be used for toilet flushing or irrigation or other non-potable end use then the proponent should consult further with NSW Health. It is likely that a risk assessment and the development of a Water Management Plan (including some treatment of the water) may be required or if not recommended depending on source, storage and type of usage.

Please note that WSLHD has its own [Planning Portal](#) with NSW Planning please forward any further requests for comments within [WSLHD area](#) to this portal as we do not always get referrals from NSW Ministry of Health.

Please contact me if you have any questions.

Regards
Helen

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