

Review of Environmental Factors Addendum

Site environmental management works, Camellia – revised raised area and eastern retaining wall

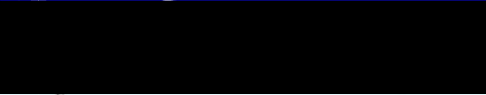
Determination

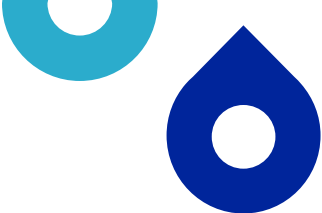
This Review of Environmental Factors Addendum (REFA) assesses potential environmental impacts of the site environmental management works, including a revised raised area and retaining wall at the eastern boundary. The REFA was prepared under Division 5.1 of the *Environmental Planning and Assessment Act 1979* (EP&A Act), with Sydney Water both the proponent and determining authority.

The Sydney Water Project Manager is accountable for ensuring the proposal is carried out as described in this REFA and the approved REF. Additional environmental impact assessment may be required if the scope of work or work methods described in this REFA change significantly following determination.

Certification

I certify that I have reviewed and endorsed this REFA and, to the best of my knowledge, it is in accordance with the EP&A Act and the Environmental Planning and Assessment Regulation 2021 (EP&A Regulation). The proposal has been considered against matters listed in section 171 (Appendix A) and the guidelines approved under section 170 of the EP&A Regulation. The information it contains is neither false nor misleading.

Prepared by:	Reviewed and endorsed by:	Endorsed by:
 Charlotte Brogan Senior Environmental Scientist Sydney Water Date: 12/12/2025	 Jill Berwick Environment Assessment Team Manager Sydney Water Date: 12/12/2025	 Bala Subramanian Senior Project Manager Sydney Water Date: 16 December 2025



Decision Statement

The main potential additional construction environmental impacts of the proposal change are interaction with contaminated groundwater and spoil. During operation, there would be no new impacts, however, there would be a reduction in potential flooding impacts. The proposal will not be carried out in a declared area of outstanding biodiversity value and is not likely to significantly affect threatened species, populations or ecological communities, or their habitats. Therefore, a Species Impact Statement (SIS) and/or Biodiversity Development Assessment Report (BDAR) is not required.

Given the nature, scale and extent of impacts and implementation of the mitigation measures outlined in this REF, the proposal is unlikely to have a significant impact on the environment. Therefore, we do not require an Environmental Impact Statement (EIS) and the proposal may proceed.

Determined by:

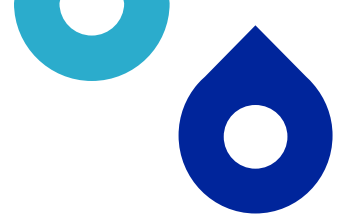


Murray Johnson
Senior Manager, Environment and Heritage
Services
Sydney Water
Date: 17/12/2025

1. Proposal description

Table 1-1 Proposal need, objectives and consideration of alternatives

Aspect	Relevance to proposal
Approved REF	Site Environmental Management Works, Camellia (October 2024).
Proposal need and objectives	Sydney Water acquired the site in May 2024. At the time, the site had partially completed earthworks. The proposal was required to implement environmental management measures at the site. The works included raising and capping the site, establishing soil and erosion controls and providing fencing. The proposal objectives are to: • stabilise the site to minimise potential environment and community impacts, until approvals can be obtained for future infrastructure works • minimise interaction with, and the potential risk of exposure to residual contaminated material • reduce long-term costs of managing contaminated soils and groundwater • raise the site above the 1% AEP flood levels.
Proposal change description and methodology	The proposal change addresses flooding concerns raised by stakeholders on the approved capping design and involves: • reducing the overall site area proposed to be raised (capped), to increase the floodway on the western boundary of the site • constructing a retaining wall along the eastern boundary of the site instead of a battered edge. A retaining wall will maximise the available land area and minimise risk of offsite sediment and contamination movement. Construction of the retaining wall will require: ○ excavation and handling of about 250m³ of contaminated spoil ○ temporary dewatering of contaminated groundwater for around three months. The reduced capping area and location of the proposed retaining wall is shown along with key environmental constraints in Figure 1-2 to Figure 1-4. The proposed methodology for the works is summarised below. Site capping works The proposal change reduces the area proposed to be filled or capped along the western boundary of the site, and expands the existing floodway, by approximately ten metres. The methodology for the capping works would remain consistent with the approved REF. That is, capping would progressively occur until the revised area is raised by 1.7 metres. Capping works would use Virgin Excavated Natural Material (VENM), Excavated Natural Material (ENM) or material approved under a general or specific Resource Recovery Order/ Exemption (RRO/RRE). In the uncapped area along the western boundary, about 200mm of natural material would be placed on top of the existing surface, to manage residual contamination in this area.



Aspect	Relevance to proposal
	The revised capping area would change the way surface water is stored and managed on site. The approved REF proposed to: • initially retain the existing retention basins on the site for surface water management • progressively infill existing retention basins as capping works progressed. Under this REFA, surface water would be stored in several new retention basins. The retention basins would be within and form part of the revised capping layer and would collect surface water. Once collected, surface water would be directed into the stormwater network and Duck River via the existing drainage channel. The retention basins would be in use until future planning approvals are obtained for the site. Retaining wall The retaining wall along the eastern boundary of the site would be about 400 metres in length and consist of both panels and posts. The panels would either be delivered to site on heavy vehicles or constructed in-situ. The retaining wall would be supported by piles about 600mm in diameter and between four to five metres deep. Piles would be spaced around 2.4 metres apart. The retaining wall would be setback about 100mm from the site boundary to enable the structure to be constructed wholly within the property. The area between the retaining wall and neighbouring property would remain as open space. Weed management controls such as grass planting would be implemented. Concrete trucks would deliver concrete for support posts. A small crane may be required to lift materials into place. Construction of the retaining wall is expected to take around 3 months and would occur simultaneous to the site capping works. Spoil from construction of the retaining wall has the potential to contain residual contamination. About 250m³ of spoil would be excavated. Spoil would be stored in temporary stockpiles within the site during construction and would be managed in accordance with a Construction Environmental Management Plan (CEMP). Figure 1-1 shows an example of a typical retaining wall cross-section.

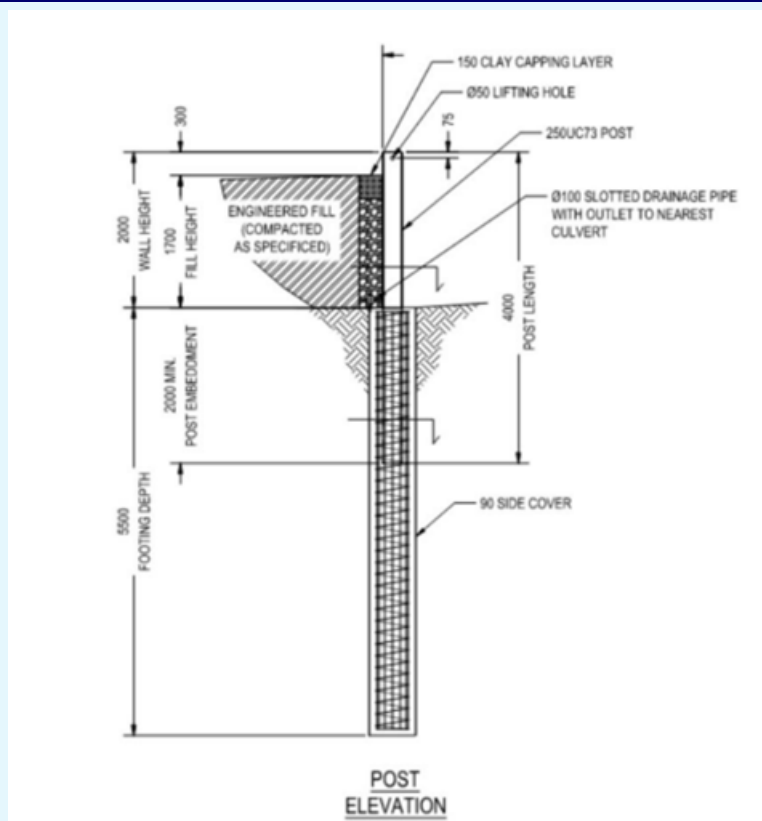


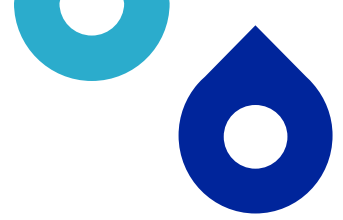
Figure 1-1 Indicative retaining wall cross-section

Depending on the level of contamination, spoil would either be reused on-site or disposed of in accordance with the NSW Waste Classification Guidelines. Preference would be to reuse the material on site where possible, to minimise the handling and transportation of contaminated spoil, and would include either:

- reusing excavated spoil to back-fill areas excavated for the retaining wall, or
- containing excess spoil under a suitable material (such as additional natural material) to mitigate dust impacts and avoid potentially contaminated sediment entering nearby waterways.

Although materials to the extent feasible would be contained within the site long-term, there is potential that future development of the site may require disturbance of the materials stored. The management of contaminated materials would be subject to a separate assessment and do not form part of this proposal change.

Groundwater is expected to be encountered while excavating for support posts. At this location, groundwater is approximately two to three metres below the existing ground level (pre-site raising). Dewatering would occur temporarily until posts are installed and excavated areas are backfilled. About 20 kilolitres (KL) of contaminated groundwater is expected to be dewatered. Once excavation is complete, posts and precast wall segments would be installed. A waterproof membrane would be installed to stop residual contaminated soil and groundwater interacting with the retaining wall structure.



Aspect	Relevance to proposal
Consideration of alternatives/options and justification for proposal change	The approved REF committed to carrying out further engagement with the City of Parramatta Council, Sydney Metro, and other stakeholders about the project and with a view to further minimise potential impacts from the site raising works. Since determination of the approved REF, we have revised the design of the area to be capped to reduce flooding impacts and respond to stakeholder feedback. New flood modelling data from stakeholders, which was not available for the approved REF was used to validate that the proposal objectives could still be achieved with a reduced capping area. The reduced capping area would reduce flooding impacts to neighbouring properties while also adequately stabilising the site for future use and managing residual contamination. During design development for the revised capping area, we identified that constructing a retaining wall along the eastern boundary of the site would: • provide additional stabilisation of the site • assist in managing residual contamination and surface runoff, to prevent the migration of spoil to adjacent land, particularly during heavy rainfall events • safeguard land for future development. The approved REF included the use of existing retention basins on site during capping works. Maintaining the use of the retention basins is not possible due to the access requirements for the site. As a result, new retention basins are required to adequately manage surface water on the site, improve containment and reduce the risk of surface water run-off. Overall, reducing the capping area, constructing the eastern retaining wall and retention basins would meet the objectives of the approved REF by managing residual contamination in the site while also reducing localised flooding impacts.
Location and land ownership	The location subject of this assessment is 9 Devon Street Rosehill (Lot 1 DP1300589) in the City of Parramatta Council Local Government Area (LGA). The Lot was acquired by Sydney Water in 2024. No new land is required for this proposal change.
Proposal timing	Site environmental management works under the approved REF have been underway since early 2025. Site capping works will occur progressively over 12 – 18 months. Construction of the retaining wall would commence in mid- 2026 and is expected to be completed in mid- 2027. A related project, the relocation of the water main (Sydney Water, November 2025) would also be in construction at the site, from mid-2026 to mid-2027.

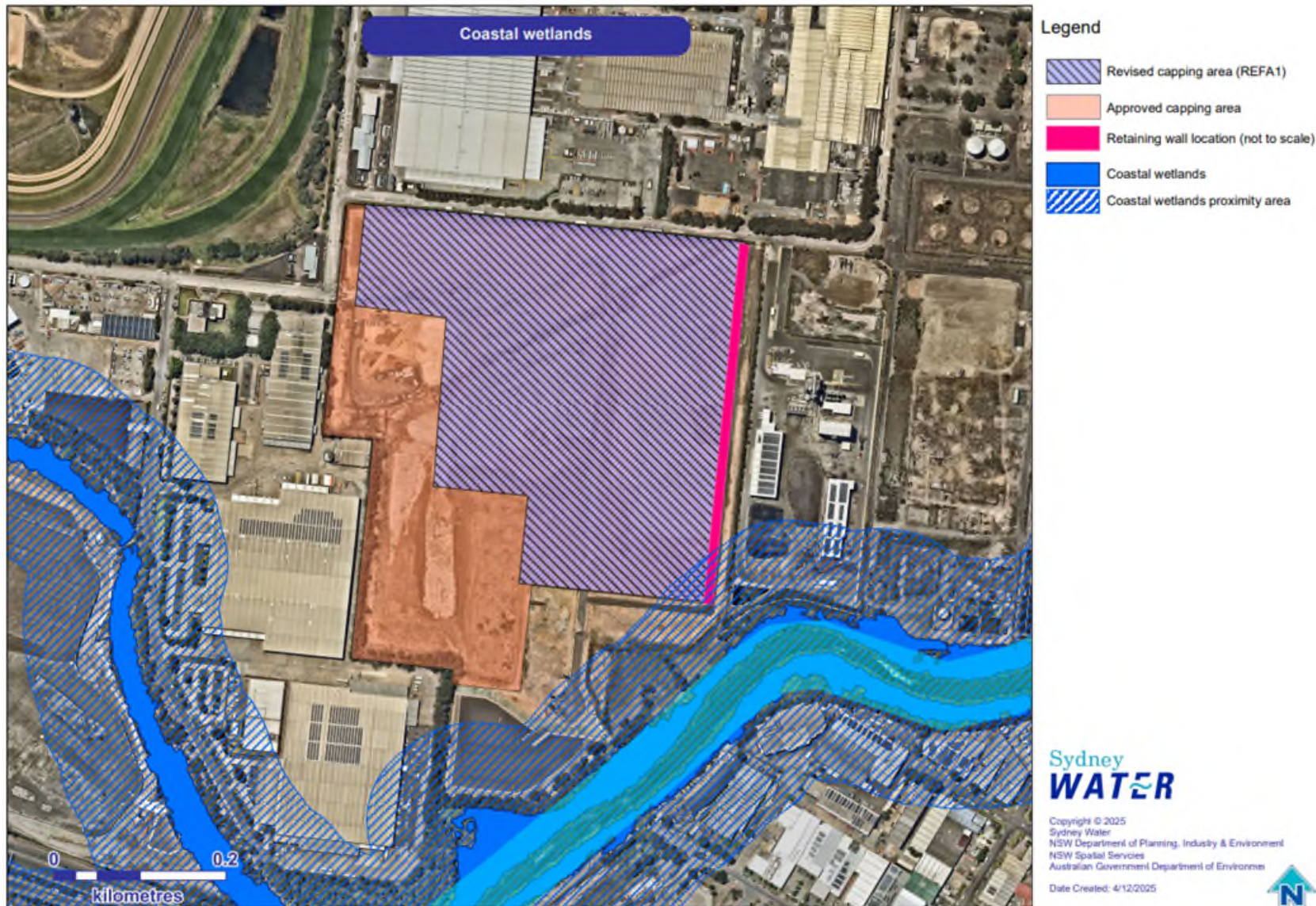


Figure 1-2 Coastal wetlands

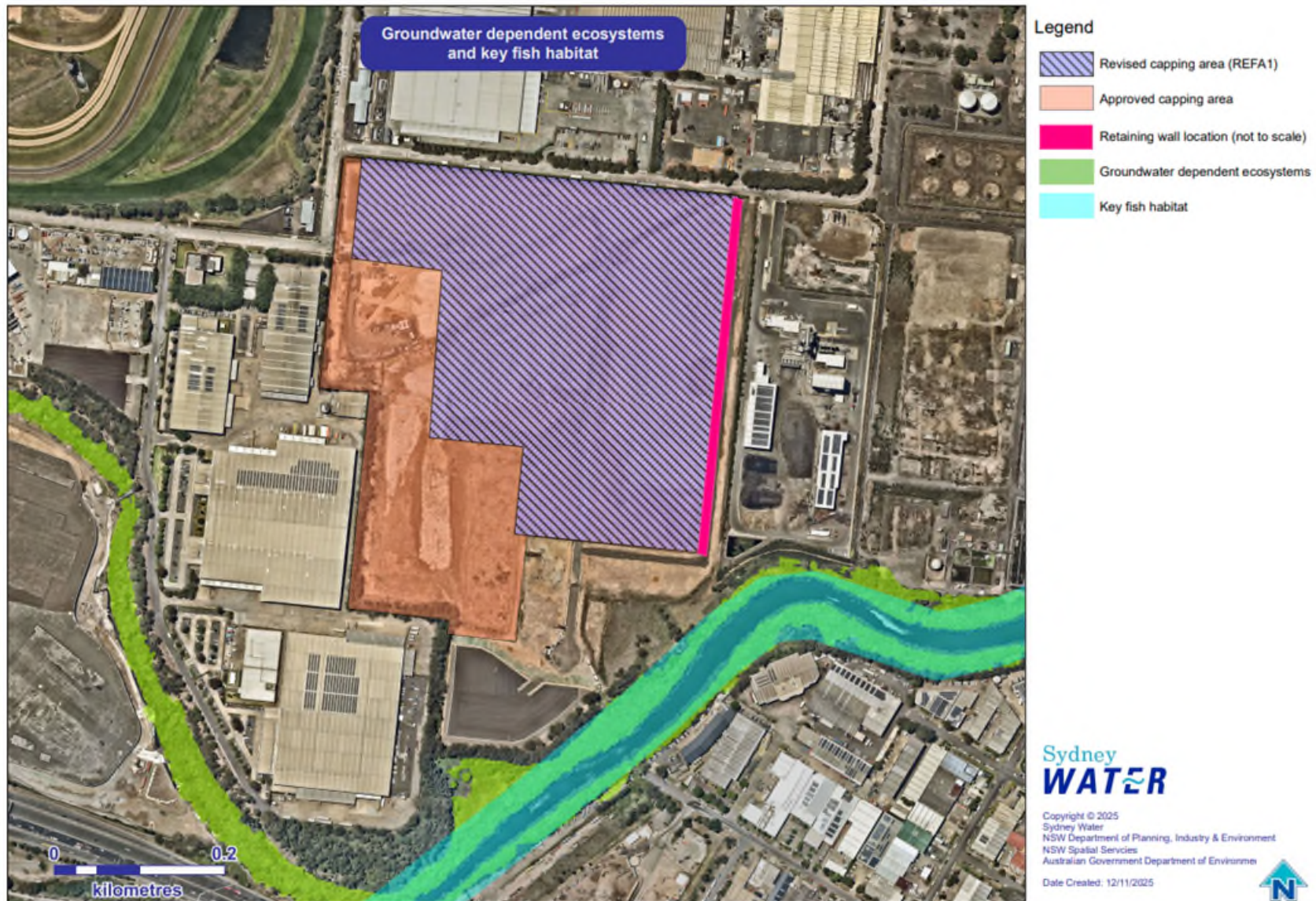


Figure 1-3 Groundwater dependent ecosystems and key fish habitat

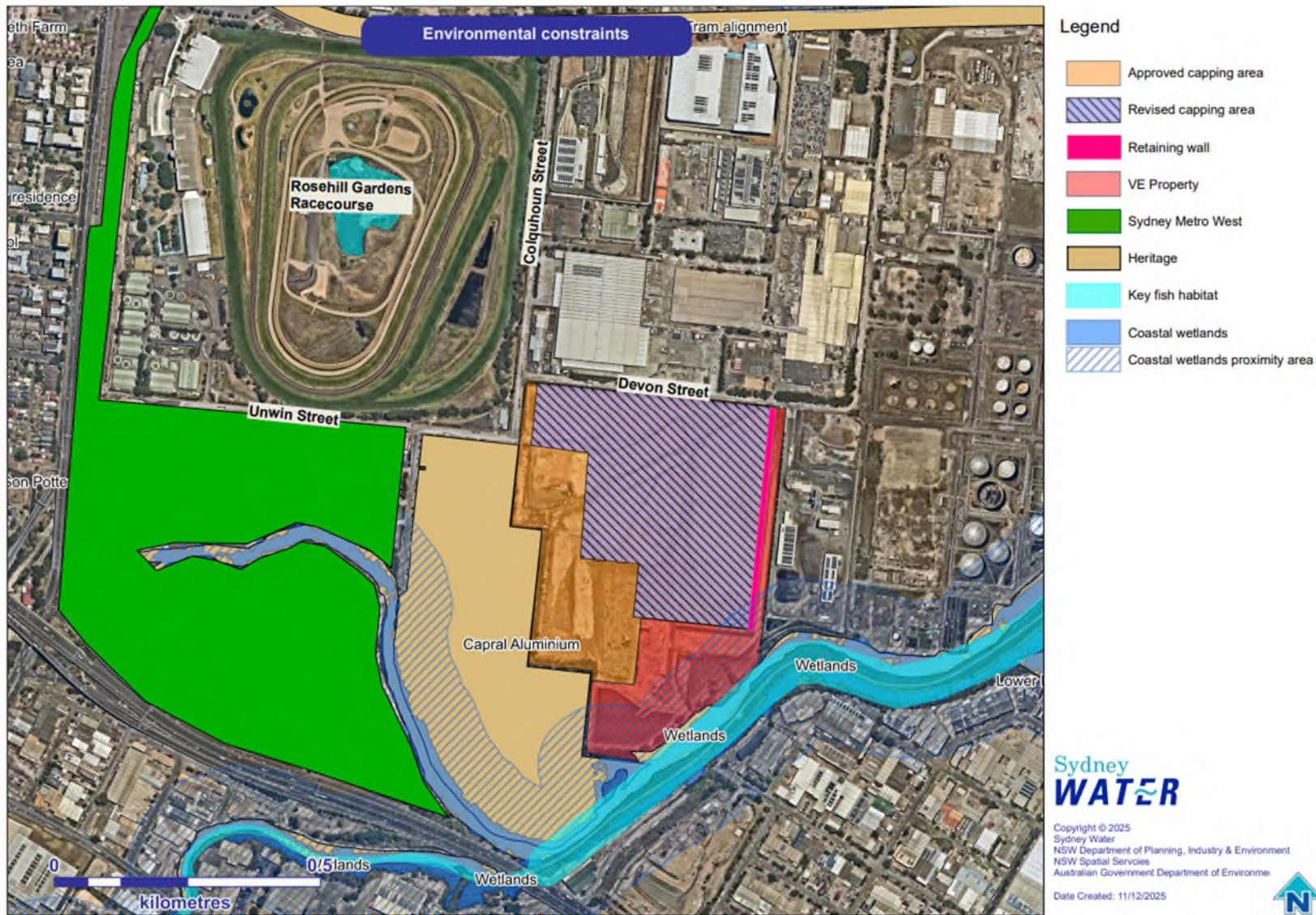
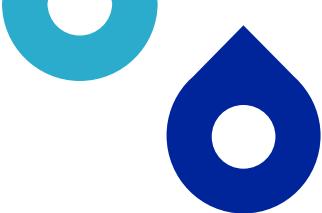


Figure 1-4 Environmental constraints



2. Consultation

Sydney Water has undertaken consultation and engagement with various stakeholders and surrounding neighbours as part of the approved REF, and during design refinement development for this addendum REF. Stakeholders engaged included Sydney Metro, City of Parramatta Council, DPHI State led rezoning team and Industry and Infrastructure Assessment teams, Conservation, Programs and Heritage Regulation (CPHR) team in DCCEW, and surrounding neighbours and landowners.

During engagement for the approved REF, Sydney Metro raised concerns that the proposal would increase the flood risk for the Sydney Metro West Clyde maintenance and stabling facility site, particularly in relation to their flood protection levels. City of Parramatta Council expressed concern that the proposal could increase flooding within the Precinct. City of Parramatta Council also requested that Sydney Water design the works to reduce flooding associated with the Devon Street 'sag', a low point in Devon Street, Rosehill. Feedback from the CPHR team was that the flood models for the different development scenarios should be able to be reviewed against the existing site conditions.

Sydney Water has carried out additional engagement with Sydney Metro to understand flooding assumptions, operational requirements and flood vulnerability for the site. Engagement has also been carried out with City of Parramatta Council about their flood assessments, plans for the area and local roads. Sydney Metro provided Sydney Water with additional flood data that was not available for the approved REF, as well as additional detail on their project. This data has been used to carry out additional flood modelling for the revised capping design and to further test the potential impacts of the proposal change.

The updated modelling shows that the revised capping design will reduce the potential for flood impacts within the area, compared to the design in the approved REF where most of the site was raised or capped. Section 4.1.2 provides details on the results of the flooding assessment undertaken for the revised design. Through consultation City of Parramatta Council have raised awareness of an existing drainage issue on Devon Street where there is a sag in the road. The proposal design and flood modelling does not affect the Devon Street sag. We will continue to consult with City of Parramatta Council on the issue.

The revised design does not affect the Devon Street sag however Sydney Water is continuing to work with City of Parramatta Council on this matter and may have opportunities during future project works to improve conditions at this location. A sensitivity assessment will also be prepared for the future project works (proposed Water Resource Recovery Facility under a State Significance Infrastructure assessment process), in accordance with the feedback from CPHR. Sydney Water will continue to work with Sydney Metro.

As described in Table 1-1, the retaining wall has been designed so that construction can occur wholly within the property. We will continue to carry out consultation with stakeholders and neighbouring landowners during detailed construction planning.

3. Legislative requirements

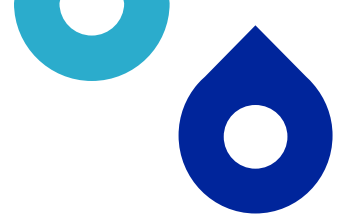
Additional legislative requirements above those already assessed in the approved REF are detailed in Table 3-1 and Table 3-2.

There are also a number of other planning approvals relevant to the site, including:

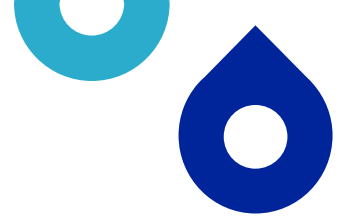
- Water main relocation, Devon Street Rosehill (Review of Environmental Factors, November 2025)
- Greater Parramatta Olympic Peninsula Water Cycle Management project (SSI-74258485)
- two former development consents obtained by the former landowner (SSD-9302 and SSD-10459). We will not be continuing either development.

Table 3-1 Environmental planning instruments relevant to the proposal change

Environmental Planning Instrument	Relevance to proposal
Parramatta Local Environmental Plan 2023 (PLEP)	The proposal is located on land zoned E5 – Heavy Industrial.
State Environmental Planning Policy (Transport and Infrastructure) 2021 (TISEPP)	‘Environmental management works’ are defined in Section 2.3 of the TISEPP as ‘works for the purpose of avoiding, reducing, minimising, or managing the environmental effects of development’. The revised design and retaining wall form part of the ongoing environmental management works for the site and for managing residual contamination. The planning approval pathway established through the approved REF would not change as a result of the proposal change. Part 2.2 of the TISEPP relates to development on flood liable land. It specifies that public authorities must consult with Councils where development will result in a greater than minor change to flood patterns. The approved REF concluded that flooding impacts would be minimal. The revised capping design will decrease the potential for flooding impacts from the approved REF. This is described further in Table 4-1. Consultation with City of Parramatta Council under Part 2.2 of the TISEPP is not required. However, we will continue to engage with Council about flood patterns.
State Environmental Planning Policy (Resilience and Hazards) 2021 (RHSEPP)	Remediation of contaminated land The proposal involves excavation and the removal and disposal of contaminated soils. The purpose of the proposal is site environmental management works. The works are not for the purposes of remediation of contaminated land, and therefore Chapter 4 of the RHSEPP does not apply. Development on land in proximity to coastal wetlands The proposal would not impact land mapped as coastal wetlands. However, about 2000 square metres in the south-eastern part of the site is within an area mapped as “proximity area for coastal wetlands”. The “proximity area” represents a



Environmental Planning Instrument	Relevance to proposal
	100 metre buffer around land that is classified as coastal wetlands. Section 2.8(1) states that development consent must not be granted to development proposed within the area marked as 'proximity area for coastal wetlands' unless a consent authority is satisfied that the development will not significantly impact on the integrity of the coastal wetland, or the quantity and quality of surface and groundwater flows to and from the wetland. The revised capping area would be constructed in the proximity area of the coastal wetland. About 60 metres of the total eastern retaining wall structure is proposed within the proximity area. As described in Table 4-1, groundwater impacts are expected to be minor and would not have an impact on coastal wetlands or groundwater dependent ecosystems. The proposal would not significantly impact the integrity of the coastal wetland, or the quantity and quality of surface and groundwater flows to and from the wetland. Development consent is not required.
State Environmental Planning Policy (Biodiversity and Conservation) 2021 (BCSEPP)	The impacts of the proposal have been considered against the following sections of the BCSEPP: • Part 6.2 (Development in Regulated Catchments) and • Section 6.28 (Development in Foreshores and Waterways Area – General). Appendix C and Appendix D of the approved REF included an assessment against these areas of the BCSEPP. The assessment concluded that the approved REF would not have an adverse impact on nearby waterways and catchments. The approved REF proposed to direct surface water run-off to the existing drainage basin on the western boundary of the site. Section 6.6(1)(d) requires a consent authority to consider whether a development will incorporate on-site stormwater retention, infiltration or reuse. The revised capping design would include several new retention basins to capture surface water and release it to the stormwater system. This is consistent with the current management of stormwater on the site and the arrangement of the approved REF. The release of stormwater from the new stormwater basins into the stormwater system and Duck River would not have an adverse impact on the environment. The approved REF did not propose dewatering of groundwater and concluded that the proposal would not affect groundwater quality or quantity. Section 6.6(1)(g) requires that a consent authority considers whether a development makes adequate provision to protect the quality and quantity of groundwater. The proposed temporary dewatering would be limited to about 20 KL of groundwater over the duration of construction for the eastern retaining wall. This is a minor amount of groundwater



Environmental Planning Instrument	Relevance to proposal
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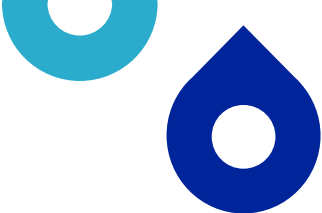
that is not anticipated to result in any impacts to groundwater dependent ecosystems.

The dewatered groundwater is anticipated to contain residual contamination. Contaminated groundwater would be managed in accordance with the Soil and Water Management Plan prepared for the approved REF. Appendix C of the approved REF also stated that groundwater will be monitored as part of the proposal. Groundwater monitoring would continue to occur consistent with the approved REF. Additional management measures for groundwater dewatering are discussed in Table 3-2 and Table 4-1.

Overall, the impacts of the proposal would be consistent with those outlined in Appendix C and D of the approved REF.

Table 3-2 Consideration of key environmental legislation

Legislation	Relevance to proposal	Permit or approval	Timing and responsibility
<i>Water Act 1912 and Water Management Act 2000</i>	Dewatering of about 20 kL of contaminated groundwater will be required for construction of retaining wall posts. Groundwater will be directed to the wastewater system for further treatment in the Sydney Water network or removed from the site and treated at a licensed facility.	A Water Supply Works Approval (WSWA) will be required for dewatering of groundwater.	Prior to construction.



4. Environmental assessment

The proposal area is unchanged from the approved REF. The proposal area is surrounded by industrial and commercial development. Non-industrial or green space areas are limited, except for Rosehill Gardens Racecourse to the northwest and Duck River to the south. The nearest residential properties are located approximately 460 metres to the southeast of the proposal area in Silverwater with additional residents located 875 metres to the west and northwest in Rosehill.

The proposal area was previously part of the Clyde Refinery which was in operation from 1918 to 2012. The site has since undergone extensive remediation works under the Western Area Remediation Project (SSD 9302). The site's former declaration as significantly contaminated land (in 2016, Declaration No. 20131110) was repealed in July 2022.

The environmental impacts checklist (SWEMS0019.01) was considered for the proposal change. Section 4.1 and Table 4-1 includes only the potentially changed aspects. Table 4-2 lists additional mitigation measures required as a result of the proposal change. All other environmental impacts in the approved REF remain the same. The additional mitigation measures will be incorporated into the contractor's CEMP.

4.1 Review of environmental aspects

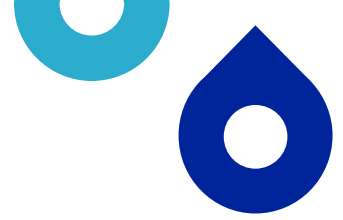
4.1.1 Topography, geology and soils

The approved REF indicated that several Chemicals of Potential Concern (COPCs) remained within the site. They include:

- asbestos
- polycyclic aromatic hydrocarbons (PAH)
- total recoverable hydrocarbons (TRH)
- hexavalent chromium
- lead
- benzene, toluene, ethylbenzene and xylene (BTEX)
- naphthalene
- light non-aqueous phase liquid (LNAPL)
- polyfluoroalkyl substances (PFAS).

Since preparation of the approved REF, Sydney Water has carried out additional soil sampling and geotechnical investigative works. These works have confirmed the presence of the COPCs within the site. Evidence of contaminants have also been found in the sediment of Duck River and are attributed to the extensive industrial land uses in the Camellia-Rosehill area and surrounds.

The proposal area has been mapped as Class 4 acid sulfate soils. During construction, ground disturbance and excavation of depths to about four to five metres may temporarily expose acid sulfate soils and are likely to expose soils containing residual contamination.



About 250m³ of spoil would be excavated for construction of the retaining wall. Without the implementation of appropriate controls, contaminated material may enter surrounding properties. Following implementation of control measures, the residual risk is expected to be low.

Excavated material would be stored in temporary stockpiles within the site over the course of construction. Stockpiled material would be managed in accordance with the Construction Environmental Management Plan (CEMP) and would be reused on site where suitable or disposed of in accordance with the NSW Waste Classification Guidelines.

Upon the completion of construction, excavated areas would be progressively backfilled, using excavated material where suitable. Where excavated material is not able to be used, imported natural material would be used.

The approved REF outlined that a construction Contamination Management Plan and an Asbestos Management Plan would be prepared by a suitably qualified person as part of the CEMP. The Contamination Management Plan was to include management requirements for waste, as well as measures for any unexpected contamination. A new or updated CEMP would be prepared for this proposal that would also include these sub-plans. No changes are proposed to the mitigation measures in the approved REF.

4.1.2 Water and drainage

Flooding

As discussed in Table 1-1 and Section 2, additional detailed design work has been undertaken in response to stakeholder feedback on potential flooding risks. This design work was supported by a number of technical assessments, including the flooding assessment at Appendix C. A TUFLOW hydraulic model was used to simulate two flood scenarios. They were:

1. mainstream flooding from Duck River, Duck Creek and Parramatta River, and
2. overland flooding from local stormwater runoff.

The assessment modelled flood scenarios for the 1% Annual Exceedance Probability (AEP) and the probable maximum flood (PMF) event (with and without climate change).

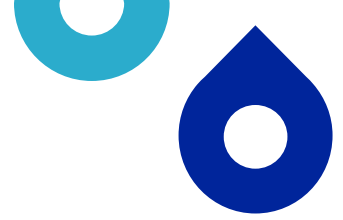
The outcomes of the modelling were compared against a baseline scenario where no capping layer was present. The modelling was carried out on a worst-case basis and as a result, assumed that no retention basins were present on the site.

1% Annual exceedance probability

The assessment found that the revised capping design would reduce potential flooding impacts when compared to the approved REF. In some areas, the potential for improvements to flooding was identified. However, there would still be a potential for flooding including:

- within Devon Street there would be an afflux of 0.07 metres
- properties to the east of the site including the Downer Rosehill Sustainable Road Resource Centre would experience an afflux of 0.02 metres. This is associated with run off flows from the afflux on Devon Street.

Properties on the northern side of Devon Street would not be impacted by this afflux as they are constructed at an elevation of about 2.5 metres above the street level.



The forecast afflux increases on Devon Street and at properties east of the site were found to be negligible and would not pose a significant risk to human safety, infrastructure or the environment.

No flooding impacts were identified at the Sydney Metro West Clyde site for the 1%AEP. This is a reduced impact from the approved REF.

Probable maximum flood event

The assessment of PMF risk found that the revised capping design would still generate some flooding impacts for the Sydney Metro West Clyde site. Despite this, the revised capping design would decrease the PMF impacts to the Sydney Metro West site from what was modelled for the approved REF. The modelling for the revised design showed that during a PMF event (with climate change), flood levels would remain below the Sydney Metro West flood protection levels. The revised capping design would not pose a significant risk to human safety, infrastructure or the environment during a PMF event.

The revised capping design would reduce PMF impacts at Unwin Street, as shown in Figure 4-1 and Figure 4-2.

The full flooding assessment is provided in Appendix C. No additional mitigation measures are proposed for flooding.

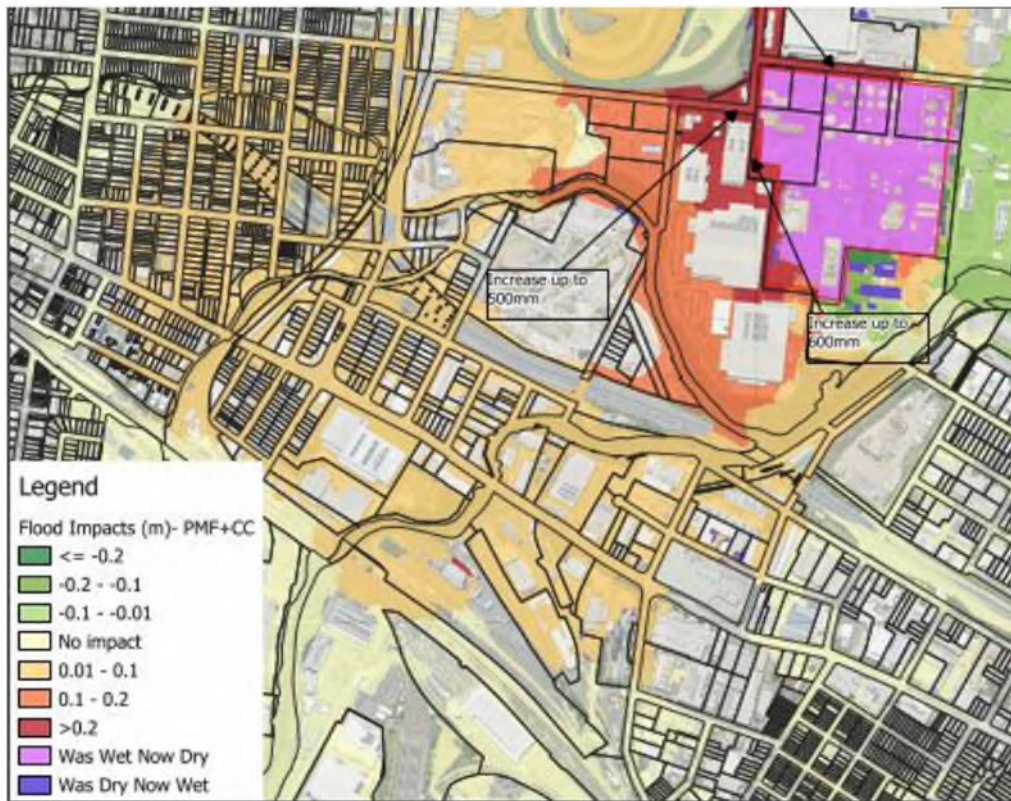
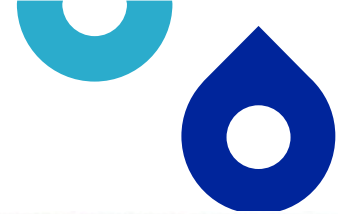


Figure 4-1 PMF with sea level rise (approved REF)

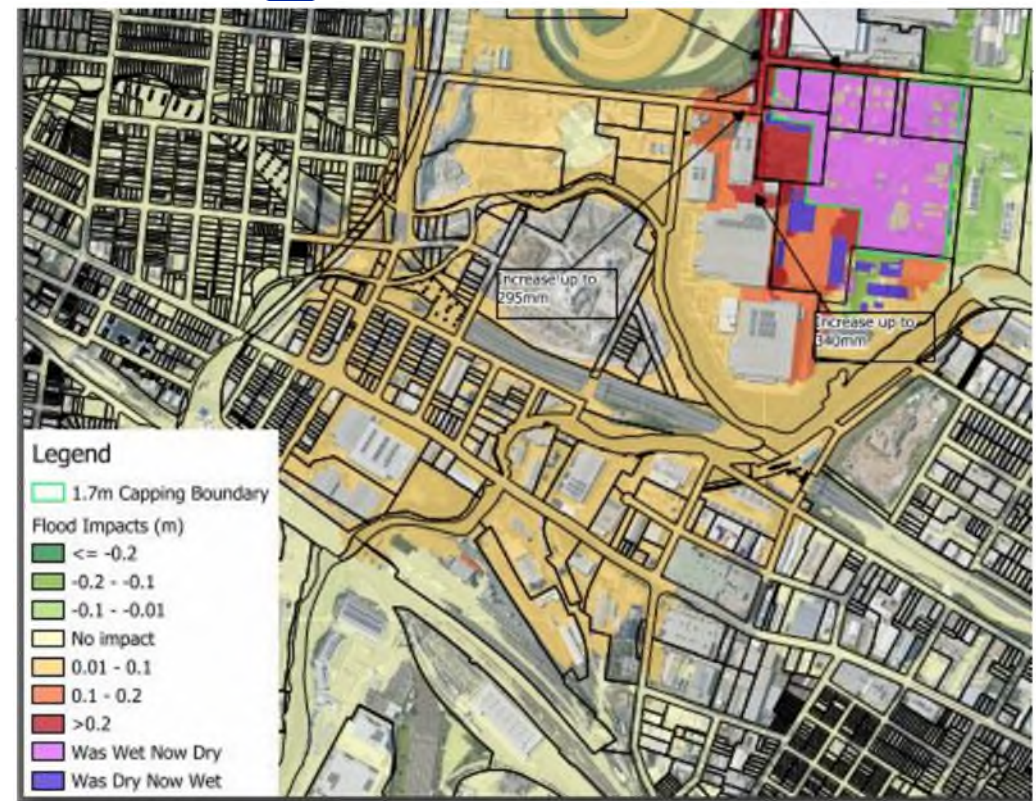


Figure 4-2 PMF with sea level rise (revised capping)

Groundwater

Excavation for the posts for the retaining wall is likely to encounter groundwater, with about 20 kilolitres expected to be dewatered. This volume is not anticipated to result in any significant groundwater drawdown impacts to nearby sensitive receivers, including Duck River, which is about 200 metres from the proposed retaining wall. There would be no impacts to groundwater dependent ecosystems (GDEs) as a result of the dewatering.

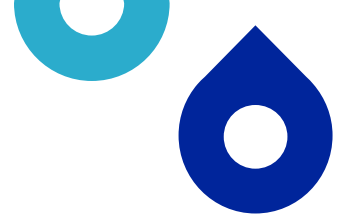
As the groundwater is anticipated to be contaminated, it will be directed to the wastewater network for treatment (in accordance with a trade waste licence) or sent to an appropriately licenced facility.

Dewatering of contaminated groundwater would be temporary and limited to construction of the retaining wall. A WSWA will be obtained prior to any dewatering works occurring. A mitigation measure for dewatering has been included in Section 4.2 as a result of the proposed change.

4.1.3 Other environmental aspects

Table 4-1 Review of other environmental aspects

Aspect	Potential additional impacts
Flora and fauna	As discussed above, impacts to GDEs as a result of groundwater drawdown are not expected. No vegetation is proposed to be removed as part of the proposal. There would be no additional impacts to flora or fauna.
Heritage	Nearby heritage items include: • Wetlands (City of Parramatta Local Environmental Plan 2023 Item No. I001) • Capral Aluminum (City of Parramatta Local Environmental Plan 2023 Item No. I677). There would be no impacts to the heritage items in the vicinity of the site. The proposal change would reduce potential risks from flooding at the Capral Aluminum site.
Noise and vibration	No changes to noise and vibration impacts are anticipated as a result of the proposal change.
Air and energy	Dust impacts from the site capping works are expected to be unchanged from the approved REF or potentially reduced as a result of the smaller area to be capped. There is potential for the proposal to generate minor and temporary air quality impacts during: • excavation work for the retaining wall • temporary stockpiling of excavated material. There is potential for dust generated during construction of the retaining wall to contain residual contamination. Construction activities and stockpiled material would be managed in accordance with the environmental controls in Table 4-2, as well as the controls for dust in the approved REF, and the CEMP. As such,



the potential for dust impacts from construction (including in contaminated spoils) is considered to be low.

Waste and hazardous materials

Some waste material is present on-site and is mixed in with soil. This includes asbestos, construction materials from previous works, such as metal reinforcement bars, concrete and plastic pipes. It is possible that this material may be encountered while excavating for the retaining wall posts.

As discussed in Table 1-1, spoil would be generated by construction of the retaining wall. We will investigate opportunities to reuse spoil on-site, including for backfilling excavated areas for other works on site. Where on-site reuse is not suitable spoil would be classified in accordance with the NSW EPA Waste Classification Guidelines (2014) and disposed of offsite.

Waste and hazardous materials (including waste from previous works) would be managed in accordance with the measures in the approved REF.

Traffic and access

As a result of the reduced capping area less imported natural material would be required for the site. As a result, there is likely to be a reduction in vehicle movements generated by the site raising works.

Construction for the retaining wall would require the use of heavy vehicles for transporting posts, precast wall panels and other materials. It is expected that the number of vehicles required for these deliveries would be minor and would not exceed the volumes assessed in the approved REF.

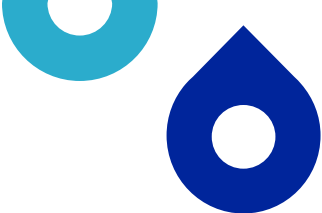
Cumulative

Several projects are currently occurring or expected to be carried out in the Camellia-Rosehill precinct at the same time as this proposal. These projects include:

- Sydney Metro West
- Parramatta Light Rail (Stage 2)
- Duck River Nature Trail project (Stage 3)
- 6 Grand Avenue, Multi-level warehouse.

There are also other activities planned at the site during construction of the proposal change, including the water main relocation.

There are no additional cumulative impacts expected as a result of this proposal change.

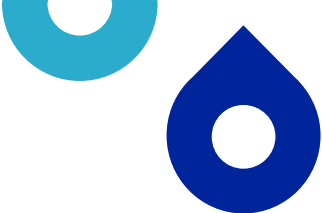


4.2 Management

The proposal would be managed in accordance with the mitigation measures outlined in the approved REF. Additional mitigation measures for the proposal change are included in Table 4-2.

Table 4-2 Additional mitigation measures

Mitigation measures
Prepare a new CEMP (or update existing) to incorporate project changes and additional mitigation measures. The CEMP should include the following management plans: • Soil and Water Management Plan • Contamination Management Plan and Asbestos Management Plan • Acid Sulfate Soils Management Plan.
A WSWA will be obtained for the project. The contractor is responsible for complying with the approval conditions (such as protecting water quality; minimising aquifer extraction volumes, monitoring extraction with flow meters and recording volumes).
A dewatering management protocol will be prepared and implemented for the eastern retaining wall. The protocol will contain measures that align to Sydney Water's Water Quality Management During Operational Activities Policy (D0001667) including: • sampling groundwater regime • methods for storing dewatered groundwater to avoid spills or leaks into the environment • disposal options based on groundwater sampling results. A trade waste licence for discharge of groundwater to the wastewater network will be obtained, where required.

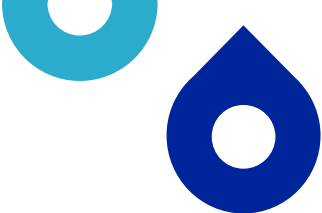


5. Conclusion

Sydney Water has prepared this REFA to assess the potential environmental impacts of the proposed change to the site environmental management works. This proposal change is to reduce potential localised flooding relative to the approved REF.

Additional construction impacts of the proposal change include potential impacts from interaction with contaminated groundwater and spoil. During operation, there would be no new impacts, however, there would be a reduction in potential flooding impacts. Given the nature, scale and extent of impacts and implementation of the mitigation measures outlined in this REFA and the approved REF, the proposal is unlikely to have a significant impact on the environment. Therefore, an environmental impact statement is not required under Division 5.1 of the EP&A Act.

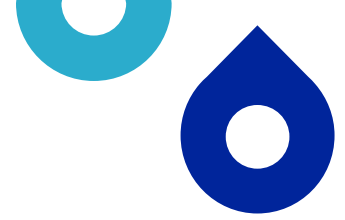
The proposal change is consistent with the approved REF and aligns with the principles of Ecologically Sustainable Development (ESD). The proposal change will result in positive long-term environmental improvements, by managing residual contamination at the site and reducing potential flooding impacts compared to the approved REF. The proposal change will not result in the degradation of the quality of the environment and will not pose a risk to the safety of the environment.



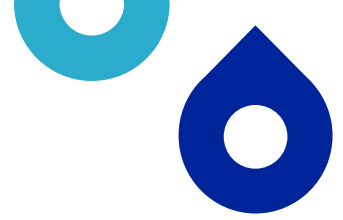
Appendix A – Section 171 checklist

There are no requirements in addition to those considered in the approved REF.

Section 171 checklist	REF finding
Any environmental impact on a community	With the implementation of mitigation measures, negative environmental impacts to the community from dust, contamination and flooding are not expected. There will be environmental improvements by stabilising the site to manage residual contamination. With implementation of the proposed mitigation measures, the residual risk to the community is expected to be low. There will also be reduced flooding impacts compared to the approved REF.
Any transformation of a locality	The proposal change will not result in the transformation of a locality.
Any environmental impact on the ecosystems of the locality	The proposal change would not result in environmental impacts to ecosystems of the locality, including coastal wetlands and GDEs. Dewatering of groundwater will be temporary during construction of the retaining wall and is not expected to result in groundwater drawdown within the area, or at Duck River. The proposal will lead to environmental improvements by containing residual contamination within the site and reducing the potential for contaminants to enter the surrounding environment.
Any reduction of the aesthetic, recreational, scientific or other environmental quality or value of the locality	The proposal change will not reduce the aesthetic, recreational, scientific or other environmental quality or value of the locality. The proposal change will reduce potential flooding impacts, compared to the approved REF, which is a positive outcome.
Any effect upon a locality, place or building having aesthetic, anthropological, archaeological, architectural, cultural, historical, scientific or social significance or any other special value for present or future generations	There will be no change to this factor compared to the approved REF.
Any impact on the habitat of any protected animals (within the meaning of the <i>Biodiversity Conservation Act 2016</i>)	The proposal change will not have any impact on the habitat of any protected animals.
Any endangering of any species of animal or plant or other form of life, whether living on land, in water or in the air	The proposal change will not endanger any species of animal or plant or other form of life, whether living on land, in water or in the air.



Section 171 checklist	REF finding
Any long-term effects on the environment	The proposal change will not have any long-term impacts on the environment but will have a long-term benefit by reducing potential impacts associated with flooding compared to the approved REF.
Any degradation of the quality of the environment	The proposal change will not degrade the quality of the environment.
Any risk to the safety of the environment	The proposal change will ensure the safety of the environment by reducing the localised flooding risks compared to the approved REF.
Any reduction in the range of beneficial uses of the environment	The proposal change will maintain the range of beneficial uses of the environment.
Any pollution of the environment	Environmental mitigation measures will mitigate the potential for the proposal change to pollute the environment. No pollution of the environment is expected.
Any environmental problems associated with the disposal of waste	Waste disposal will be in accordance with the environmental mitigation measures. No environmental problems associated with the disposal of waste are expected as a result of the proposal change.
Any increased demands on resources (natural or otherwise) that are, or are likely to become, in short supply	The proposal change will not affect demand on resources likely to be in short supply.
Any cumulative environmental effect with other existing or likely future activities	The proposal change will not have any cumulative environmental effect with other existing or likely future activities.
Any impact on coastal processes and coastal hazards, including those under projected climate change conditions	The proposal change will not have any impact on coastal processes and coastal hazards, including those under projected climate change conditions. Climate change predictions have been included in the flood modelling for the proposal change.
Any applicable local strategic planning statements, regional strategic plans or district strategic plans made under the EP&A Act, Division 3.1	The Camellia-Rosehill Place Strategy (Department of Planning and Environment, 2023) is a 20-year plan for the renewal of Camellia-Rosehill. The Strategy identifies a new town centre and enhanced entertainment precinct, new urban services precinct and land retained to support heavy industry. Sydney Water has acquired the site to develop a future WRRF to service the area. The proposal change will support the strategy.



Section 171 checklist	REF finding
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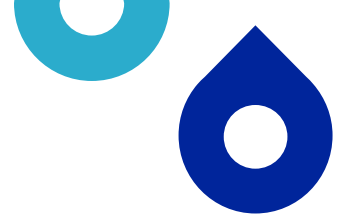
Any other relevant environmental factors.	The proposal change has been assessed against the factors listed above, and there are no other relevant environmental factors to consider.
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Appendix B – Consideration of TISEPP consultation

TISEPP section	Yes	No
Section 2.10, council related infrastructure or services – consultation with council		
Will the work:		
Potentially have a substantial impact on stormwater management services provided by council?		✓
Be likely to generate traffic that will strain the capacity of the road system in the LGA?		✓
Connect to, and have a substantial impact on, the capacity of a council owned sewerage system?		✓
Connect to, and use a substantial volume of water from a council owned water supply system?		✓
Require temporary structures on, or enclose, a public space under council's control that will disrupt pedestrian or vehicular traffic that is not minor or inconsequential?		✓
Excavate a road, or a footpath adjacent to a road, for which the council is the roads authority, that is not minor or inconsequential?		✓
Section 2.11, local heritage – consultation with council		
Is the work likely to affect the heritage significance of a local heritage item, or of a heritage conservation area (not also a State heritage item) more than a minor or inconsequential amount?		✓
Section 2.12, flood liable land – consultation with council		
Will the work be on flood liable land (land that is susceptible to flooding by the probable maximum flood event) and will works alter flood patterns other than to a minor extent?		✓
Section 2.13, flood liable land – consultation with State Emergency Services		
Will the work be on flood liable land (land that is susceptible to flooding by the probable maximum flood event) and undertaken under a relevant provision*, but not the carrying out of minor alterations or additions to, or the demolition of, a building, emergency works or routine maintenance?		✓
* (e) Div.14 (Public admin buildings), (g) Div.16 (Research/ monitoring stations), (i) Div.20 (Stormwater systems)?		
Section 2.14, development with impacts on certain land within the coastal zone– council consultation		
Is the work on land mapped as coastal vulnerability area and inconsistent with a certified coastal management program?		✓
Section 2.15, consultation with public authorities other than councils		



TISEPP section	Yes	No
Will the proposal be on land adjacent to land reserved under the <i>National Parks and Wildlife Act 1974</i> or land acquired under Part 11 of that Act? <i>If so, consult with DPE (NPWS).</i>		✓
Will the proposal be on land in Zone C1 National Parks and Nature Reserves or on a land use zone that is equivalent to that zone? <i>If so, consult with DPE (NPWS).</i>		✓
Will the proposal include a fixed or floating structure in or over navigable waters? <i>If so, consult TfNSW.</i>		✓
Will the proposal be on land in a mine subsidence district within the meaning of the <i>Coal Mine Subsidence Compensation Act 2017</i> ? <i>If so, consult with Subsidence Advisory NSW.</i>		✓
Will the proposal be on land in a Western City operational area specified in <i>the Western Parkland City Authority Act 2018</i> , Schedule 2 and have a capital investment value of \$30 million or more? <i>If so, consult the Western Parkland City Authority.</i>		✓
Will the proposal clear native vegetation on land that is not subject land (ie non-certified land)? <i>If so, notify DPE at least 21 days prior to work commencing. (Requirement under s3.24 Chapter 3 Sydney Region Growth Centres - of the SEPP (Precincts – Central River City) 2021).</i>		✓



Appendix C – Flooding assessment