Review of Environmental Factors

Water main relocation, Devon Street Rosehill

Determination

This Review of Environmental Factors (REF) assesses potential environmental impacts of the relocation of the water main at Devon Street in Rosehill. The REF 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 REF. Additional environmental impact assessment may be required if the scope of work or work methods described in this REF change significantly following determination.

Certification

I certify that I have reviewed and endorsed this REF 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:
[redacted]	[redacted]	[redacted]
Tanmay Kulkarni REF author Jacobs Date: 29/09/25	Jill Berwick Environment Representative Sydney Water Date: 30/09/25	Max Gilbert Project Manager Sydney Water Date: 30/09/25

Decision Statement

The main potential construction environmental impacts of the proposal include impacts from noise and dust and impacts to soils and water quality. The proposal is not expected to have impacts during operation. 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:	[redacted]	Murray Johnson Senior Manager Environment and Heritage Water and Environmental Services Sydney Water Date: 30/09/2025

1 Proposal description

Table 1 Description of proposal

Aspect	Detailed description
Proposal need and objectives	The proposal involves relocating an existing water main at a site that Sydney Water recently acquired at Devon Street in Rosehill. Sydney Water acquired the site for future development and is seeking state significant infrastructure approval for a new water resource recovery facility (WRRF) at the site. The WRRF will service growth in the Greater Parramatta and Olympic Peninsula (GPOP) area. The project is referred to as the GPOP water cycle management project (GPOP WCM, SSI-74258485). The existing water main within the site is a critical water asset within the Ryde water network, servicing over one million people. The existing water main is aging, crosses through the site and would constrain future infrastructure development at the site. The relocation of the water main involves installing a new water main around the perimeter of the site and then decommissioning the existing water main. The proposal has the following objectives: • relocate a critical water asset prior to the GPOP WCM project commencing, to avoid damage to an existing aging asset • decommission the critical water asset to remove it as a constraint to the design and construction of the GPOP WCM project • enhance future access to the pipeline for operation and maintenance purposes • reduce the risk of cross contamination of a drinking water asset with wastewater treatment.
Proposal description and methodology	The proposal is to relocate a portion of the existing water main. The water main currently crosses the proposal area, as shown in **Figure 1** and further detailed in **Appendix D**. About 480 m of the existing water main will be decommissioned, and a new water main will be constructed along the western and northern boundaries of the proposal area (adjacent to Colquhoun and Devon Streets). The new water main will traverse an Endeavour Energy easement and connect to the existing water main within the berm on Devon Street. The new water main will be a mild steel cement lined pipe and is slightly larger than the existing water main (size OD1400 compared to DN1200). Ancillary infrastructure will also be installed as part of the proposal, including air valves, scour valves, hydrants and cathodic protection as required. The works will also involve relocation of a small wastewater pipe within the site. Temporary works such as site offices, amenities, compounds and laydown areas will also be required. The proposed alignment of the new water main will be excavated to a depth of about 5 m and width of about 2 m. The existing small (DN90) wastewater pipe will be relocated to provide space for the new water main. Formwork and the new water main will be placed within the excavated trench. The pipe will

Aspect	Detailed description
	be welded and one new isolation valve will be installed to allow for future pipework interconnections, bypasses and maintenance work. One new scour valve will be installed towards the upstream connection. Once all elements are installed, the pipe will be concrete encased. The trench will be backfilled to raise the surface level to its previous height as needed.
Consideration of alternatives/options	Four relocation options and the 'do nothing' scenario were considered for the proposal. All relocation options would connect the new main to the existing main on Devon Street. The portion of the existing main within the proposal area would then be decommissioned. The options are shown in **Appendix C** and described below: • Option 1 – Construct a new 817 metre water main outside of the proposal area, along Colquhoun Street and Devon Street. This option would involve many service crossings and impact the WRRF feed pipe route. • Option 2 – Construct a new 878 metre water main along the southern and eastern boundaries of the proposal area. This option would not impact existing services but would require additional pipe. This option would also provide a constraint to the site layout of the WRRF. • Option 3 – Construct a new 779 metre water main within the proposal area, along Colquhoun Street and Devon Street. This option would also involve service crossings and impact potential future WRRF infrastructure. • Option 4 – construct a new 725 metre water main within the proposal area, along Colquhoun Street and Devon Street. A small wastewater pipe will have to be relocated. • 'Do nothing' – the existing water main would remain in its existing location. Reliable water supply would continue (including maintenance due to its age), however the site layout of the WRRF would be highly constrained as a large portion of the proposal area would be unavailable for use. Option 4 is preferred. This option will ensure a reliable water supply to more than one million customers and facilitate use of the land. The new water main has been sized for future water supply demand and will be concrete encased to allow future development over the water main and minimise pipeline maintenance.
Location and land ownership	The proposal area is within Lot 1 DP 1308385 and a portion of road reserve located on Devon Street, Rosehill, as shown in **Figure 1**. The proposal area is predominantly owned by Sydney Water and is within the City of Parramatta Local Government Area (LGA). The portion of the proposal area within the road reserve is owned by the City of Parramatta Council.

Aspect	Detailed description
Site establishment and access	Site establishment will include: • services detection • install environmental controls • deliver and install site offices and amenities, including temporary utility connections • install security measures such as fencing • set up parking areas • designate stockpile locations • set up machinery maintenance and wash down areas • install bunds and fuel storage tanks • take delivery of equipment. The proposal will use existing roads to access the site. Internal haul roads will be constructed as needed throughout construction.
Commissioning	The new pipeline will be connected to existing water pipelines. This will require a diversion of water flows from the existing pipeline for up to four weeks. Commissioning works will only be undertaken during winter, a time of low demand, to minimise impacts on customers. Commissioning involves testing and running the new equipment to ensure it works correctly and is integrated with existing operations. The commissioning steps would include: • pressure test the pipeline • check all equipment and safety devices • performance testing including sampling where required • dechlorination of the pipe, using super-chlorination and sodium ascorbate dosing if required • discharge of dechlorination and any other wastewater as required, potentially including diesel pump out. Commissioning will follow Sydney Water's standard commissioning processes.

Aspect	Detailed description
Decommissioning of existing main	Once flushing and water quality testing of the new water main is complete, the water supply from the existing water main will be cut over to the new water main. This may take up to four weeks, during which water flows will be diverted. The target cutover period will be completed during April – August when water demand is low. Water within the existing network will be discharged in accordance with Sydney Water's Water Quality Management During Operational Activities Policy – D0001667. Once the new water main is operational, options will be investigated to reuse the existing pipe. If reuse options are not feasible, the pipe will be partially grout-filled to decommission it.
Machinery and equipment	• Excavators • Haulage trucks • Dozers, graders, front end loaders • Compactors, rollers • Concrete agitator trucks • Concrete line pump • Crane • Water carts • Vacuum trucks • Pumps • Generators • Lighting towers (night works)
Ancillary facilities (compounds)	A construction compound will likely be required to house construction amenities, materials laydown and personnel parking. Other works associated with the site environmental management works project (Sydney Water, 2024) may also be occurring at the same time. The compound for the water main relocation will be located within the site, with the location to be determined during construction planning.
Work hours	Work and deliveries will mainly be scheduled during standard daytime hours: • 7 am to 6 pm, Monday to Friday • 8 am to 1 pm, Saturdays. The proposal will require work outside of these hours to tie-in to the existing water main. These works will be undertaken outside of standard daytime hours to limit impacts on customers and surrounding properties. These out of hours works have been assessed and mitigation measures are provided in Section 4.
Proposal timing	Construction is expected to start in early 2026 and take about 18 months, so the tie-in works can occur during winter 2027.
Operation	Minimal maintenance will be required once the new pipeline is operational due to the majority of the pipeline being concrete encased. Routine inspections and maintenance will be undertaken in accordance with Sydney Water's standard operating protocols to ensure the pipeline is working to standard.

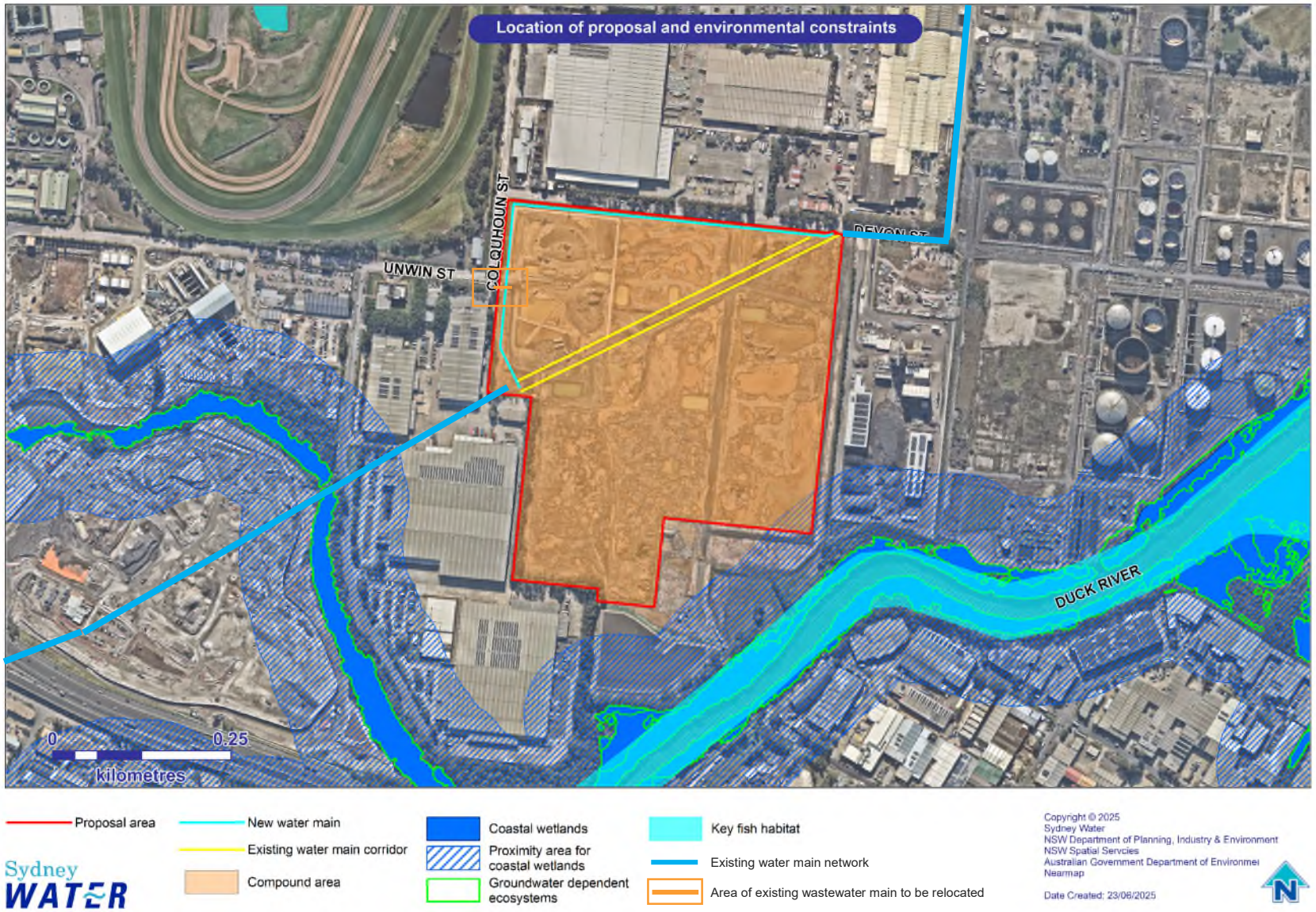

Figure 1 Location of proposal and environmental constraints

2 Consultation

Community and stakeholder consultation - general

Our approach to community and stakeholder consultation is guided by Sydney Water's community and stakeholder engagement guidelines.

Stakeholder and community engagement is a planned process of initiating and maintaining relationships with external parties who have an interest in our activities. Community and stakeholder engagement:

- enables us to explain strategy, policy, proposals or programs
- gives the community and stakeholders the opportunity to share their knowledge, issues and concerns
- enables us to understand community and stakeholder views in our decision-making processes alongside safety, environment, economic, technical and operational factors.

The nature, scale and extent of the proposal's potential impact has been evaluated in this REF. If our work impacts the community in some way, we will consult with affected groups throughout the proposal. This includes engaging the broader community and stakeholders during plan or strategy development or before making key decisions.

We will also provide council with reasonable notice when we would like to commence works. Councils will be consulted about matters identified in environmental planning instruments such as public safety issues, temporary works on council land, and full or partial road closures of council managed roads (refer below).

Community and stakeholder consultation – proposal

Consultation for this proposal has been undertaken as a part of the consultation for the GPOP WCM project. This engagement has included newsletter drops, door knocks, general notifications and online webinars.

During consultation, some concerns have been raised relating to existing traffic congestion on Grand Avenue and within the Camellia-Rosehill precinct. This was raised by neighbouring businesses and heavy vehicle operators servicing the industrial area. The potential for dust generation was raised as a concern by the nearby racecourse but is not anticipated to be a significant impact from this proposal. Support for the GPOP WCM project has been received, particularly for the development of a new water resource recovery facility to service growth and support additional housing for the growing GPOP precinct.

Ongoing consultation with the City of Parramatta Council is occurring. The need to relocate the water main has been discussed, including timing and approvals pathway.

Sydney Water will continue to engage with the community and other stakeholders about the proposal. Other infrastructure asset owners (electricity, communications) will be consulted prior to excavation works commencing and appropriate permits will be obtained as required.

Consultation required under State Environmental Planning Policies and other legislation

Sydney Water must consult with councils and other authorities for work in sensitive locations or where the work may impact other agencies' infrastructure or land. This is specified in the State

Environmental Planning Policy (Transport and Infrastructure) 2021 (TISEPP) and summarised in **Appendix E**.

Although the proposal is situated on flood liable land, it is expected to have negligible flooding impacts. Due to the negligible flooding impacts of the proposal, formal consultation under the TISEPP is not necessary.

3 Legislative requirements

Environmental planning instruments that are relevant to the proposal are summarised in **Table 2**. **Table 3** considers key environmental legislation relevant to the proposal and identifies the timing and responsibility for additional permits and approvals.

Table 2 Environmental planning instruments relevant to the proposal

Environmental Planning Instrument	Relevance to proposal
Parramatta Local Environmental Plan 2023 (Paramatta LEP)	The proposal is located on land zoned Heavy Industrial (E5) and mapped as acid sulfate soils class 4 under the Parramatta LEP. The Parramatta LEP does not restrict the carrying out of development by or on behalf of a public authority that is permitted to be carried out under the State Environmental Planning Policy (Transport and Infrastructure) 2021. The Parramatta LEP is subject to the provisions of any State environmental planning policy, which prevails over the LEP.
State Environmental Planning Policy (Transport and Infrastructure) 2021 (TISEPP)	Section 2.159(1) of the TISEPP permits development by or on behalf of a public authority for water reticulation system by or on behalf of a public authority without consent on any land. As Sydney Water is a public authority, the proposal is permissible without consent.
State Environmental Planning Policy (Biodiversity and Conservation) 2021 (BCSEPP)	**Water catchments (Chapter 6)** Chapter 6 of this SEPP applies as the proposal is within the Sydney Harbour Catchment, a regulated catchment area. Section 4 of this REF assessed potential environmental impacts on water quality and quantity, aquatic ecology, flooding, access, cultural heritage, flora and fauna, and scenic quality. The assessment confirmed that potential impacts are minimal and meet the requirements of part 6.2 of the SEPP. Part 6.3 of the BCSEPP also applies as the proposal area is on land within or abutting the mapped Harbour Foreshores and Waterways Area. The required general considerations are provided in s 6.28 of the SEPP and are addressed in **Appendix F** of this REF.

Environmental Planning Instrument	Relevance to proposal
State Environmental Planning Policy (Resilience and Hazards) 2021 (RHSEPP)	**Coastal Management (Chapter 2)** A small portion of the proposal area is located within land mapped as 'proximity area for coastal wetlands'. This area has been previously cleared of vegetation. Despite the previous clearing and disturbance, impacts on the wetlands have been considered. The proposal will not significantly impact on any mapped coastal wetlands, including the biophysical, hydrological or ecological integrity of the adjacent wetlands, nor the quantity and quality of surface and groundwater flows. Section 4 further details potential impacts, with mitigation measures provided in Section 4. **Remediation of Land (Chapter 4)** The proposal involves excavation and the removal and disposal of potentially contaminated soils. However, the purpose of the project is the relocation of the water main and there is only a potential that residual contaminated soils will be present. The works are not for the remediation of contaminated land, and therefore Chapter 4 of the RHSEPP does not apply.

Table 3 Consideration of key environmental legislation

Legislation	Relevance to proposal	Permit or approval	Timing and responsibility
Protection of the Environment Operations Act 1997 (POEO Act)	The proposal is not associated with the construction and operation of the future WRRF, which will be subject to separate approvals. The proposal is not a scheduled activity. It is not considered to be contaminated soil treatment as any excavated contaminated material would not be treated on-site. Therefore an environment protection licence (EPL) is not required.	An EPL is not required.	Not applicable.
Contaminated Land Management (CLM) Act 1997	The proposal area is subject to a site audit statement due to previous contamination. Site audits with long-term environmental management plans (LTEMPs) occurred prior to Sydney Water's ownership of the site.	No additional approvals or site audits are needed for these works. LTEMPs will be adhered to.	Not applicable.

Legislation	Relevance to proposal	Permit or approval	Timing and responsibility
	Excavation for the pipeline will be in soil which may contain residual contamination. Further detail is provided in Section 4.		
Biodiversity Conservation Act 2016 (BC Act)	The proposal has the potential to generate noise and vibration and may involve some work at night-time. Potential impacts on the Grey-headed Flying-fox (a Vulnerable species under the BC Act) were considered in a Test of Significance undertaken for the site environmental management works in the proposal area in October 2024. The Test of Significance concluded that a significant impact on the Grey-headed Flying-fox was not likely to result from the site environmental management works. Noise and vibration impacts of the proposal are expected to be less than those from the site environmental management works, as detailed in Section 4. Night works for both projects would not occur at the same time. As such, the proposal is also not expected to significantly impact the Grey-headed Flying-fox.	No additional approvals are needed.	Not applicable.
Heritage Act 1977	The proposal area is located in close proximity to the locally-listed heritage item, Capral Aluminium. Works will only occur within the proposal area, with no disturbance to this heritage item.	No additional approvals are needed.	Not applicable.
Fisheries Management Act 1994 (FM Act)	The proposal will not require any works within the nearby mapped key fish habitat, Duck River.	No additional approvals are needed.	Not applicable.
Water Act 1912 and Water Management Act 2000	The proposal area is located in the Sydney Basin Central Groundwater Source. Dewatering of groundwater will be required for the proposal. Groundwater is likely to be contaminated, and will be discharged into the wastewater system for	Water Supply Works Approval	Pre-construction. Sydney Water on behalf of the contractor.

Legislation	Relevance to proposal	Permit or approval	Timing and responsibility
	treatment, or removed from site to a licensed facility. The assessment predicts less than 3ML of groundwater will be dewatered.		
Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)	A Significant Impact Criteria assessment was prepared for the Grey-headed Flying-fox (Vulnerable) for the site environmental management works in the proposal area in October 2024. The assessment concluded that there would not be a significant impact from noise and vibration at night. Potential noise and vibration impacts from this proposal are anticipated to be less than the site environmental management works, and night works will not occur at the same time. As such, the findings from the Significant Impact Criteria Assessment are considered to be applicable. No other Matters of National Environmental Significance will be impacted by the proposal. Referral to the Commonwealth Department of Climate Change, Energy, the Environment and Water is not required.	No additional approvals are needed.	Not applicable.
Roads Act 1993	Devon Street is classified as a local road managed by council. Any road or lane closures will require approval from the City of Parramatta Council.	Road Occupancy Licence	Pre-construction. Contractor.

4 Environmental assessment

The environmental impacts checklist (SWEMS0019.01) was completed for the works. **Table 4.1** includes only the potentially impacted aspects and **Table 4.2** lists relevant mitigation measures.

Table 4 Review of environmental aspects

Aspect	Potential impacts
Topography, geology and soils	The site was historically a petroleum refinery which resulted in contamination of the soils and groundwater. In 2016, the proposal area was declared significantly contaminated land under the CLM Act. The site has since been remediated by the previous landowner in accordance with a remediation action plan (RAP) to address human health and ecological risks. The RAP and associated remediation works were endorsed by an EPA accredited independent site auditor via site audits under the CLM Act. In 2022, the EPA repealed the declaration of significantly contaminated land for the site. To manage the site and any residual contaminated material, Sydney Water commenced site environmental management works which are currently being undertaken, to stabilise the site and raise part of the site with natural material. The proposal area has been mapped as Class 4 acid sulfate soils. During construction, ground disturbance and excavation of depths to about 5 m may temporarily expose acid sulfate soils and soils containing residual contamination. Contaminants of potential concern that could be exposed include asbestos, hydrocarbons, polyfluoroalkyl substances (PFAS), total recoverable hydrogen, asbestos, benzene, ethylbenzene, toluene, xylene, copper, zinc and lead. About 6,720 m^3 of spoil material is expected to be excavated and will be stockpiled over the course of construction. Stockpiled material will be placed within the compound area, as determined by the contractor and will ultimately be reused on-site or disposed of offsite. If reused on-site, natural fill material will be placed over the material. Without appropriate controls, contaminated material could be transported onto surrounding properties. Environmental controls (including the mitigation measures identified in Section 4) will be implemented to prevent offsite movement of material. Once adequate controls are in place, the potential contamination impacts of the proposal are expected to be low. Construction activities such as trenching and stockpiling will temporarily alter surface topography. These excavations will be progressively backfilled using stockpiled material (where appropriate) and/or imported natural material. The site will be restored to a condition suitable for future works. Consequently, the potential impacts of the proposal on topography following, geology and soils will be negligible.
Water and drainage	***Water quality*** Duck River is located about 80 metres south of the proposal area and flows to the northeast before reaching Parramatta River. Duck River is mapped as key fish habitat and bordered by mapped coastal wetlands. A small portion of the 'Coastal Wetlands Proximity Area' is mapped within the proposal area.

A channel which drains into Duck River is located along the western boundary of the proposal area. This drainage channel conveys stormwater from the western area of the site, as well as Unwin Street and Colquhoun Street. Stockpiled material will not be placed over this channel.

During construction, the excavation and movement of material within the site has the potential to create dust and expose soils to erosion risks, which may lead to increased sedimentation in Duck River. The works could also impact water quality from the interaction of surface water with contaminated soils, or leaks of fuel, hydraulic fluid from plant, or from other materials required during construction.

The works and site will be managed, and appropriate mitigation measures will be implemented to prevent erosion, sedimentation, and other water quality impacts to Duck River. Fuels, chemicals and any hazardous materials required for construction will be appropriately handled and stored. This will include containing materials in appropriately bunded areas within construction compounds and in small volumes. Refuelling activities will be restricted to bunded areas. Once mitigation measures are implemented, impacts to water quality and coastal wetlands are expected to be negligible.

Flooding

The proposal area is located on flood prone land affected by the probable maximum flood (PMF) event. In the 1% AEP flood, the northern portion of the proposal area is affected by overland flooding from Unwin Street, Colquhoun Street and Devon Street. There is also overland flow affecting the western boundary of the proposal site, where the new water main is proposed. These flows pond in Unwin Street and flow south along the western boundary in an existing overland flow path. In the 1% AEP flood, maximum depths of ponding in Unwin Street are up to 0.5 m.

Flooding has the potential to increase movement of spoil offsite during construction. The implementation of mitigation measures will ensure that active worksites are prepared for the onset of wet weather and spoil is not transported offsite.

Once constructed, the proposal is not anticipated to affect or be affected by flooding.

Groundwater

The proposal area is in an unconfined to semi-confined shallow perched groundwater system within fill materials and shallow alluvium. It has potential for a deeper confined groundwater system within the alluvium / bedrock. Groundwater flows in a south-southeast direction, with groundwater levels varying throughout the proposal area, between 0.6 metres below ground level (mbgl) to 5 mbgl. Groundwater sampling (Jacobs, 2024) identified concentrations of some heavy metals, and other contaminants (TRH, BTEX, PAH and PFAS compounds) as noted above. The concentrations exceeded the human health and ecological guideline levels for the protection of receptors.

Given the depth of excavation (up to 5 m below ground level), groundwater is expected to be encountered. Groundwater movement at the site is slow, and

	inflow rates into the excavated areas are estimated to be up to 96 litres and 250 litres per day, with a total volume of up to 90,000 litres (0.9ML) along the entire alignment for a 12 month construction period, based on upper estimates. Groundwater dewatering can have adverse impacts on groundwater quality and change groundwater levels. Dewatering volumes at each location within the proposal area is yet to be determined. A Water Supply Works Approval will be obtained before any dewatering occurs. 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. The proposal is located about 200 metres north of a groundwater dependent ecosystem (GDE), Duck River. The proposal would not impact the GDE, however potential impacts from groundwater extraction would be mitigated using mitigation measures identified in Section 4.
Noise and vibration	The closest residential receivers are located about 460 metres to the southeast of the proposal area and 875 metres to the west and northwest of the proposal area. The Rosehill Gardens Racecourse horse stables are located about 620 metres to the west of the proposal area. Night works may have a noticeable impact on noise levels at the horse stables. This can be mitigated by consulting with the Australian Turf Club. The ecology assessment found that night time works would not significantly impact fauna in the area. Vibration impacts are expected to be low as no tunnelling or directional drilling will be undertaken. Compaction works may generate some minor disturbances to building occupants in surrounding properties. However, exposure to vibration is expected to be for limited durations due to the progressive nature of backfill activities along the length of the trench.
Air and energy	The proposal will potentially result in minor and temporary air quality impacts from: • dust generated during construction activities such as excavation and stockpiling • dust generated by construction vehicles travelling on unsealed access routes • emissions from machinery, equipment and vehicles used during construction. Given the industrial surroundings and distance to residential receivers, impacts from dust emissions are expected to be minimal. Impacts will be mitigated through mitigation measures identified in Section 4. As the proposal involves relocation of an existing wastewater main, energy use is predicted to be minimal. The option with the shortest pipeline length was also selected. Fuel and energy use will be monitored by the Contractor and reported on in accordance with Sydney Water requirements. No odour impacts are expected to occur from the proposal.

Waste and hazardous materials	Some waste material is present on-site mixed within the soil. This includes asbestos and construction materials from previous works, such as metal, reinforcement bars, concrete and plastic pipes. Where possible, waste material will be separated to be recycled. Opportunities to reuse the spoil on-site will be considered, including backfilling excavated areas for other works onsite. Where reuse on-site is not practicable, spoil will be disposed offsite and classified in accordance with the NSW EPA Waste Classification Guidelines 2014 prior to removal, including as: • general solid waste (potentially special waste if including asbestos) • restricted solid waste (potentially special waste if including asbestos) • small volumes of liquid waste. The volumes of these materials are yet to be confirmed. The contractor will seek opportunities to reduce, recycle and reuse materials. This will be documented in the CEMP. Waste will be tracked using the EPA's Waste Locate online tracking system.
Traffic and access	The key local and state roads providing access to the proposal area are: • James Ruse Drive (state road): 3-lane dual carriageway that runs to the west of the proposal area • Great Western Highway/ Parramatta Road (state road): 2-lane dual carriageway which provides access to the proposal area in the south • Grand Avenue (local road): located to the north of the proposal area and provides access to James Ruse Drive • Wentworth Street (local road): provides access to Great Western Highway in the south • Devon Street/Durham Street, Colquhoun Street, Unwin Street (local roads) immediately next to the proposal area. The closest bus stop to the proposal area is located on James Ruse Drive, about 900 m northwest of the proposal area. Cycling and walking facilities are limited in the Camellia-Rosehill area. However, plans for a walking and cycling network for the Duck River Nature Trail, connecting to the M4 Shared Path and Parramatta River foreshore are expected to open between 2025 to 2028. On-street parking along Colquhoun Street and Devon Street is well-used. Typical construction would involve up to 15 workers on-site at any one time. The peak construction periods are expected to generate 15 light vehicle movements and 10 heavy vehicle movements (total inbound and outbound) per hour. Construction worker parking will also be provided within the proposal area minimising impacts on local roads. Additional movements on local roads required as a result of the proposal are considered to be less than 1% of existing flows experienced by the James

	Ruse Drive, Grand Ave and Hassall Street intersection. Therefore, the proposal would have a negligible impact on the operation of this intersection. Impacts to the surrounding roads network performance, parking and public transport are also expected to be negligible.
Flora and fauna	No native vegetation is proposed to be cleared, and no native fauna is likely to be impacted by the proposed works. The GHFF is a threatened species which has been identified within the vicinity of the site. This proposal will require some night works during connection of the new water main to the existing water system. The site environmental management works project assessed the potential impacts of night works on this species from noise and vibration. The assessment found there were unlikely to be significant impacts as a result of that proposal. This assessment is considered relevant to this project due to the minor and short term nature of these night works, compared with the assessment undertaken for the site environmental (24 hour spoil deliveries) and movement of spoil on site under lights.
Social and visual	The area is not currently valued for its scenic character, however vegetation along the watercourses of Duck River south of the proposal area and Parramatta River to the east screen the industrial precinct. Visibility of the proposal area would be limited to bordering private industrial properties and streets surrounding the site. The site is not directly connected to Duck River. Temporary visual impacts associated with traffic, site compounds, worksites and lighting during construction may occur. Given the existing moderately lit industrial setting these visual impacts are negligible.
Cumulative and future trends	The timing of the proposal may overlap with some of the site environmental management works onsite. These works involve bringing natural material to site to raise part of the proposal area. While most of the site environmental management works should be complete (particularly spoil deliveries), there may be some remaining minor activities onsite. Parramatta Light Rail (PLR) opened in late 2024, with stage 2 of the project still under construction. As part of the project, a stabling and maintenance facility has been constructed on the south-eastern corner of Grand Avenue and Colquhoun Street. New traffic signals are proposed on Grand Avenue at the stabling and maintenance facility access road, east of Colquhoun Street. These traffic signals will facilitate light rail trams crossing Grand Avenue when travelling to and from the stabling and maintenance facility. Sydney Metro West is also under construction near the proposal. A stabling and maintenance facility is being constructed in the area bounded by M4 Motorway, James Ruse Drive and Rosehill Gardens Racecourse. Vehicle access during construction of the facility will be via Wentworth Street. Kay Street and sections of Unwin Street will be realigned and replaced with an at-grade road and underpass designed to accommodate B-doubles. Downer Sustainable Road Resource Centre (operational) is located immediately next to the proposal area, alongside the eastern boundary, and includes an asphalt plant producing 550,000 tonnes per annum (tpa), a reclaimed asphalt pavement facility processing 250,000 tpa, a bitumen

products plant producing 15,000 tpa, and a Reconomy facility that recycles street sweepings and other waste products for asphalt production, processing 40,000 tpa. The centre operates 24 hours a day. Several modifications are proposed for this facility, including increasing the processing of reclaimed asphalt pavement to 375,000 tpa and modifying the Reconomy facility to enable the reuse of waste and increase the variety of input recycled waste materials. The timing of these modifications is yet to be confirmed.

Given the existing industrial setting of the area, and the proximity to arterial roads, cumulative impacts are not expected to be significant. Sydney Water will continue to consult and work with local projects and stakeholders to minimise impacts.

Future trends that could impact the proposal were considered, such as bushfires, coastal hazards, flooding, extreme heat and extreme storm events related to climate change. As the proposal is for the relocation of an existing water main, the proposal is unlikely to be impacted by or to impact future trends.

Table 4.2 Mitigation measures

Mitigation measures
General
Prepare a Construction Environmental Management Plan (CEMP) addressing the requirements of this environmental assessment. The CEMP should specify licence, approval and notification requirements. Before the start of work, all project staff and contractors will be inducted in the CEMP. The CEMP must be readily available on site and include a site plan which shows: • boundaries of the work area, including locations of lay-down and storage areas for materials and equipment • location of environmental controls (such as erosion and sediment controls, spill kits, stockpile areas) • any specific requirements for the interaction of two projects within the proposal area.
Prepare an Incident Management Plan (IMP) outlining actions and responsibilities for: • predicted/onset of heavy rain during works • spills • unexpected finds (eg contamination) • other projects onsite • other potential incidents relevant to the scope of works. All site personnel must be inducted into the IMP.
Follow SWEMS0009 to ensure compliance with legislative requirements for incident management (for example *Protection of the Environment Operations Act 1997*). Attach SWEMS0009 to the CEMP.

Complaints to be managed in accordance with Sydney Water's Complaints Procedure and relevant Community Engagement Plan.

All affected customers will be notified of the timing of disruptions to the water supply.

Conduct a dilapidation survey prior to works which have potential to damage existing structures.

Topography, geology and soils

Contractor to ensure any imported material is VENM or meets a relevant NSW EPA Resource Recovery Order and Resource Recovery Exemption or is a commercially supplied material that is not waste.

If using materials that are subject to a NSW EPA Resource Recovery Order/Exemption the Contractor must ensure imported material is not accepted on-site unless the conditions in that Order/Exemption are strictly adhered to.

Prevent sediment moving offsite in accordance with Managing Urban Stormwater, Soils and Construction, Volume 1 and 2A (Landcom 2004 and DECC 2008). Measures could include (but are not limited to):

- divert surface runoff away from disturbed soil and stockpiles, where possible
- install sediment and erosion controls before construction starts
- inspect controls at least weekly and immediately after rainfall
- rectify damaged controls immediately
- install controls to avoid mud tracking onto local roadways
- remove controls once surfaces have been stabilised, including removing trapped sediment in drainage lines.

The adopted measures will be documented in a Soil and Water Management Plan (SWMP) prepared by the contractor, which will be adhered to during construction. The SWMP will also include:

- exact location of stockpiles, which are to be outside flood area, away from watercourses and drainage lines
- methods to prevent mixing of potentially contaminated material with natural material
- an acid sulfate soils management plan
- spoil and material tracking protocol which includes a process for tracking all spoil
- a procedure for dewatering, in accordance with Sydney Water's Water Quality Management During Operational Activities Policy (D0001667).

Stop work during heavy rainfall or in waterlogged conditions when there is a risk of sediment loss off site.

The Contractor is responsible for monitoring adverse weather conditions and ensuring adequacy of erosion and sediment controls to ensure that the sedimentation of surrounding waterways does not occur.

Prevent sediment/soil movement offsite. Sweep up any sediment/soil transferred off site immediately and before rainfall.

A construction Contamination Management Plan and an Asbestos Management Plan must be prepared by a suitably qualified person as part of the CEMP and reviewed and endorsed by Sydney Water's

Environmental Representative in consultation with internal contamination experts including the appointed site auditor. The Contamination Management Plan must identify as a minimum:

- the type and location of known and potential contamination
- land-owner notification requirements
- management requirements (waste minimisation, waste segregation and classification)
- reuse, offsite recycling and/or disposal measures
- any stop-works provisions for unexpected contamination (including notifying Sydney Water's Environmental Representative).

A post-construction Contaminated Land Management Plan (CLMP) must be prepared by a suitably qualified person prior to completion of the proposal. The plan must be reviewed by the Contamination and Hazardous Materials team. The plan must identify the type and location of contamination, risk mitigation measures such as location, type and extent of capping layers (if applicable) and the required ongoing management measures.

Undertake all site works in accordance with the existing LTEMPs. The LTEMPs should be incorporated into the CEMP and all site personnel should be inducted into the LTEMP. Ensure required notification requirements are complete before undertaking works (eg SafeWork NSW).

Water and drainage

A Water Supply Works Approval 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).

Discharge all water in accordance with Sydney Water's Water Quality Management During Operational Activities Policy (D0001667) including erosion controls, discharge rate, dechlorination, monitoring. Reuse water where possible.

Obtain a trade waste licence for discharge of groundwater to the wastewater network, where required. Reduce sediment load in any waters discharged to the wastewater network.

Store all chemicals and fuels in accordance with relevant Australian Standards and Safety Data Sheets. Record stored chemicals on site register. Ensure bunded areas have 110% capacity of the largest chemical container, or an additional 25% capacity of the total volume stored within (whichever is greater). Tightly secure chemicals and fuels in vehicles. Clearly label all chemicals.

Locate portable site amenities, chemical storage and stockpiles of erodible materials away from watercourses, drainage lines and flood prone areas.

Conduct refuelling, fuel decanting and vehicle maintenance in compounds where possible. If field refuelling is necessary, designate an area away from waterways and drainage lines with functioning spill kits close by.

Ensure equipment is leak free and well maintained. Repair oil/fuel leaks immediately or remove from site and replace with a leak-free item.

Keep functioning spill kit on site for clean-up of accidental chemical/fuel spills. Keep the spill kits stocked and located for easy access.

Conduct any equipment wash down within a designated washout area.

Noise and vibration

Incorporate all reasonable and feasible noise management mitigation measures into the CEMP, including but not limited to:

- identify and consult with surrounding receivers about the proposal before works start. This should describe the nature of works, the expected noise impacts (including, approved hours of work and including night works), duration, complaints handling and contact details
- implement a noise complaints handling procedure
- select appropriate plant for each task, to minimise the noise impact
- do not use engine brakes when entering or leaving the work site(s) or within work areas
- regularly inspect and maintain equipment in good working order
- arrange the work site where possible to minimise noise. For example, set up the site to minimise use of vehicle reversing alarms
- use natural landforms/mounds or site sheds as noise barriers
- use non-tonal reverse alarms on vehicles and machinery
- follow Sydney Water's Noise Management Code of Behaviour (SWEMS0056.01) and document all reasonable and feasible management measures to be implemented
- for out of hours work shifts, consult with potentially impacted receivers before these commence. If needed, identify and implement reasonable and feasible noise controls and review night time construction activities and work hours.

When out of hours/night works are required, the Contractor shall submit an Out of Hours Work Permit. This would identify the proposed shifts, noise controls, construction hours and any consultation undertaken/required. The Permit is to be approved by the Sydney Water Project Manager in consultation with the environment and communications representatives.

Consult with the Australian Turf Club regarding potential for noise from night works to impact at the horse stables. If required for noise management, at night ensure trucks/heavy vehicles avoid using the Unwin Street, Kay Street and Wentworth Street route, to minimise noise impacts on the horse stables.

Any changes to construction equipment and plant would be reviewed prior to construction commencing to determine whether further assessment would be required.

Air and energy

Use alternatives to fossil fuels where practical and cost-effective.

Track fuel and energy use per SWEMS0015.28 Contractor NGER template.

Maintain equipment in good working order, comply with the clean air regulations of the *Protection of the Environment Operations Act 1997*, have appropriate exhaust pollution controls, and meet Australian Standards for exhaust emissions.

Switch off vehicles/machinery when not in use.

Implement measures to prevent offsite dust impacts, for example:

- minimise the length of on-site haul roads and maintain haul roads in a condition that minimises dust
- minimise vehicle speeds over unsealed surfaces
- water haul roads and stockpiles as required to maintain moisture (using non-potable water source where possible)
- modify or cease activities that are generating visible dust
- modify or cease work in windy conditions
- cover exposed areas with tarpaulins or geotextile fabric.

Contractor to consider the intensity of site activities and dust emissions on race days.

Cover all transported waste.

Waste and hazardous materials

Manage waste in accordance with relevant legislation and maintain records to show compliance, such as waste register, waste classification (if relevant), import and export register (material haulage), transport and disposal records. Record and submit SWEMS0015.27 Resource use and recovery report template.

Provide adequate bins for general waste, hazardous waste and recyclable materials.

Minimise stockpile size and ensure delineation between different stockpiled materials.

Prevent pollutants from escaping by covering skips and bins.

Minimise the generation of waste and sort waste streams to maximise reuse/recycling in accordance with the legislative requirements. Incorporate waste management measures within the CEMP.

Traffic and access

Prepare a Traffic Management Plan (TMP) as part of the CEMP. Ensure all traffic management measures included in the TMP are in accordance with Parramatta City Council and/or Transport for NSW requirements.

The contractor will ensure that the site layout prevents any queuing on local roads. This includes, but is not limited to:

- stage trucks to avoid all trucks arriving at the same time
- orient the site to minimise congestion or need to reverse.

The contractor will provide construction and operational worker parking within the proposal area.

The contractor will encourage workers to use more sustainable transport modes e.g. car pooling to reduce the number of private vehicles.

Consult with nearby projects, including PLR and Sydney Metro West to manage traffic impacts as needed.

Erect signs to inform road users of the proposal and any temporary road or lane closures.

Minimise impacts to surrounding businesses by consulting with them.

Social and visual

Maintain work areas in a clean and tidy condition

Undertake works in accordance with Sydney Water Communications policies and requirements including:

- notify impacted businesses
- erect signs to inform the public on nature of work
- personnel to treat community enquiries appropriately.

Minimise light spill by directing lighting away from sensitive receivers (residents, roads or fauna). This lighting will be operated in accordance with AS/NZS 4282:2019 Control of the obtrusive effects of outdoor lighting.

Cumulative impacts

Undertake regular consultation with key stakeholders in the area.

References

Department of Environment and Climate Change (DECC) (2008) Managing Urban Stormwater, Soils and Construction, Volume 2A, NSW Government

Jacobs (2024) *Detailed Site Investigation – Camellia*

Landcom (2004) Managing Urban Stormwater, Soils and Construction, Volume 1, NSW Government

Sydney Water (2024) *Review of Environmental Factors Site Environmental Management Works, Camellia (October 2024)*

Appendix A

Section 171 checklist

Section 171 checklist	REF finding
Any environmental impact on a community	There may be short-term impacts on the community from noise, dust, exposure of contaminated soils and traffic during construction. The proposal will have beneficial long-term impacts by ensuring a reliable water supply.
Any transformation of a locality	The locality is dominated by industrial activity and development work. The proposal is consistent with these activities. The proposal will not result in the transformation of a locality.
Any environmental impact on the ecosystems of the locality	The proposal occurs in previously disturbed areas and is not expected to result in biodiversity or other environmental impacts. Mitigation measures outlined in Section 4 will be implemented to mitigate any environmental impacts on ecosystems of the locality.
Any reduction of the aesthetic, recreational, scientific or other environmental quality or value of the locality	The proposal occurs in previously disturbed areas and is compatible with the heavy industrial setting of the area. The proposal will not reduce the aesthetic, recreational, scientific or other environmental quality or value of the locality.
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	A local heritage item is located adjacent to the proposal area and there are areas of aesthetic value surrounding the proposal area. However, the proposal will not have 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.
Any impact on the habitat of any protected animals (within the meaning of the *Biodiversity Conservation Act 2016*)	The proposal will not require any vegetation removal and will not 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 will not be endangering any species of animal, plant or other form of life, whether living on land, in water or in the air.
Any long-term effects on the environment	The proposal will not have any long-term impacts on the environment but will have a long-term benefit by providing a reliable and modern water service for the area.
Any degradation of the quality of the environment	Temporary exposure of contaminated soils during construction could affect the quality of the environment if this material is transported offsite, for example through runoff. Mitigation measures outlined in Section 4 will be implemented to prevent contaminated material moving offsite and to ensure the quality of the environment is not degraded.

Section 171 checklist	REF finding
Any risk to the safety of the environment	Exposure of contaminated soils could pose a temporary risk to the safety of the environment during construction. Direct contact with contaminated material poses a human health risk, while the movement of contaminated material may present a risk to the local ecosystem. Mitigation measures outlined in Section 4 will be implemented to lessen any risks to the safety of the environment.
Any reduction in the range of beneficial uses of the environment	The proposal will not reduce the range of beneficial uses of the environment. The proposal will facilitate the effective use and future development of the land at the WRRF site.
Any pollution of the environment	Environmental mitigation measures will be implemented to mitigate the potential for the proposal to pollute the environment. No pollution of the environment is expected once these measures are implemented.
Any environmental problems associated with the disposal of waste	Waste disposal will be in accordance with the environmental mitigation measures, and no environmental problems associated with the disposal of waste are expected.
Any increased demands on resources (natural or otherwise) that are, or are likely to become, in short supply	The proposal will not increase demand on resources, that are, or are likely to become, in short supply.
Any cumulative environmental effect with other existing or likely future activities	Cumulative impacts from traffic and noise may occur considering the number of major projects occurring in the surrounding area. The likely impact to receivers is low. Mitigation measures outlined in Section 4 will be implemented.
Any impact on coastal processes and coastal hazards, including those under projected climate change conditions	The proposal is not within an area subject to coastal processes or coastal hazards. The proposal will not have any impact on coastal processes or hazards, and coastal processes and coastal hazards will not have any impact on the proposal.
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 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 will support the strategy.
Any other relevant environmental factors.	The proposal has been assessed against the factors listed above, and there are no other relevant environmental factors to consider.

Appendix B

Consideration of principles of ecologically sustainable development (ESD)

Principle	Proposal alignment
Precautionary principle - *if there are threats of serious or irreversible environmental damage, lack of scientific uncertainty should not be a reason for postponing measures to prevent environmental degradation. Public and private decisions should be guided by careful evaluation to avoid serious or irreversible damage to the environment where practicable, and an assessment of the risk-weighted consequences of various options.*	The proposal will not result in serious or irreversible environmental damage and there is no scientific uncertainty relating to the proposal.
Inter-generational equity - *the present generation should ensure that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations.*	The proposal will help to meet the needs of future generations by providing a reliable water service, and facilitating the future development of the site.
Conservation of biological diversity and ecological integrity - *conservation of the biological diversity and ecological integrity should be a fundamental consideration in environmental planning and decision-making processes.*	The proposal will not significantly impact on biological diversity or impact ecological integrity. The proposal occurs in previously disturbed areas, with no vegetation clearance proposed. No impacts to biodiversity are expected.
Improved valuation, pricing and incentive mechanisms - *environmental factors should be included in the valuation of assets and services, such as 'polluter pays', the users of goods and services should pay prices based on the full life cycle costs (including use of natural resources and ultimate disposal of waste) and environmental goals*	The proposal will provide cost efficient use of resources and provide optimum outcomes for the community and environment through providing a reliable and modern water service, and effectively using the site for the WRRF.

Appendix C

Options assessment

To be provided upon request

Appendix D

Design drawings

To be provided upon request

Appendix E

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?		X
Be likely to generate traffic that will strain the capacity of the road system in the LGA?		X
Connect to, and have a substantial impact on, the capacity of a council owned sewerage system?		X
Connect to, and use a substantial volume of water from a council owned water supply system?		X
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?		X
Excavate a road, or a footpath adjacent to a road, for which the council is the roads authority, that is not minor or inconsequential?		X
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?		X
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?		X
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)?		X
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?		X
Section 2.15, consultation with public authorities other than councils		
Will the proposal be on land adjacent to land reserved under the *National Parks and Wildlife Act 1974* or land acquired under Part 11 of that Act? *If so, consult with DPE (NPWS).*		X
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? *If so, consult with DPE (NPWS).*		X
Will the proposal include a fixed or floating structure in or over navigable waters? *If so, consult TfNSW.*		X
Will the proposal be on land in a mine subsidence district within the meaning of the *Coal Mine Subsidence Compensation Act 2017*? *If so, consult with Subsidence Advisory NSW.*		X
Will the proposal be on land in a Western City operational area specified in *the Western Parkland City Authority Act 2018,* Schedule 2 and have a capital investment value of $30 million or more? *If so, consult the Western Parkland City Authority*.		X
Will the proposal clear native vegetation on land that is not subject land (ie non-certified land)? *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).*		X

Appendix F

Development in Foreshores and Waterways Area, General considerations (section 6.28)

Considerations	Response
(1) In deciding whether to grant development consent to development in the Foreshores and Waterways Area, the consent authority must consider the following— (a) whether the development is consistent with the following principles— (i) Sydney Harbour is a public resource, owned by the public, to be protected for the public good, (ii) the public good has precedence over the private good, (iii) the protection of the natural assets of Sydney Harbour has precedence over all other interests	Not applicable. The proposal area is located 80 m from Duck River and does not include the foreshore or waterway area. The proposal will not affect public access to these areas.
(b) whether the development will promote the equitable use of the Foreshores and Waterways Area, including use by passive recreation craft,	Not applicable. The proposal area is located 80 m from Duck River and will not affect equitable use of the Foreshore or Waterway areas.
(c) whether the development will have an adverse impact on the Foreshores and Waterways Area, including on commercial and recreational uses of the Foreshores and Waterways Area	Not applicable. The proposal area is located 80 m from Duck River and will not affect commercial or recreational uses of the Foreshore or Waterway areas.
(d) whether the development promotes water-dependent land uses over other land uses,	Not applicable. The proposal area is located 80 m from Duck River and does not affect water dependent or other land uses.
(e) whether the development will minimise risk to the development from rising sea levels or changing flood patterns as a result of climate change,	The proposal is not likely to impact flooding in the area or Duck River, or affect flood risk to the water main.
(f) whether the development will protect or reinstate natural intertidal foreshore areas, natural landforms and native vegetation,	Not applicable. The proposal area is located 80 m from Duck River and will not affect natural intertidal foreshore areas, natural landforms and native vegetation.
(g) whether the development protects or enhances terrestrial and aquatic species, populations and ecological communities, including by avoiding physical damage to or shading of aquatic vegetation,	The proposal area comprises previously disturbed lands. The proposal will not remove or affect any terrestrial or aquatic vegetation.

Considerations	Response
(h) whether the development will protect, maintain or rehabilitate watercourses, wetlands, riparian lands, remnant vegetation and ecological connectivity.	The proposal is located 80 m from Duck River and will not impact on watercourses, wetlands, riparian lands, remnant vegetation or ecological connectivity.
(2) Development consent must not be granted to development in the Foreshores and Waterways Area unless the consent authority is satisfied of the following— (a) having regard to both current and future demand, the character and functions of a working harbour will be retained on foreshore sites,	Not applicable. The proposal area is located 80 m from Duck River and does not include the Foreshore or Waterway areas.
(b) if the development site adjoins land used for industrial or commercial maritime purposes—the development will be compatible with the use of the adjoining land,	The proposal is within a Heavy Industrial area, the proposal is compatible to this use. The proposal is not adjoining land used for maritime purposes.
(c) if the development is for or in relation to industrial or commercial maritime purposes—public access that does not interfere with the purposes will be provided and maintained to and along the foreshore,	Not applicable. The proposal area is located 80 m from Duck River and does not include the Foreshore or Waterway areas or activities for maritime purposes. The proposal will not affect public access.
(d) if the development site is on the foreshore—excessive traffic congestion will be minimised in the zoned waterway and along the foreshore,	Not applicable. The proposal area is located 80 m from Duck River and does not include the Foreshore or Waterway area. The proposal will not affect traffic in a waterway or foreshore area.
(e) the unique visual qualities of the Foreshores and Waterways Area and its islands, foreshores and tributaries will be enhanced, protected or maintained, including views and vistas to and from— (i) the Foreshores and Waterways Area, and (ii) public places, landmarks and heritage items.	Not applicable. The proposal area is located 80 m from Duck River and does not include the Foreshore or Waterway. The proposal area is located immediately next to a locally listed heritage item, however will not affect views to or from this site.