

Comments on Sydney Water REF for OCU at Unwin St.

P.3 **Sydney Water has decided to do an REF, which makes it both the proponent and the determiner** – this doesn't give any confidence that issues have been addressed fully and frankly from a disinterested perspective. And SW has lots of latitude to change things as they go along – see S2.2 P.14

P.4 S1.3 **Inadequate detail is given of the “multi-criteria assessment” employed - only some parameters are listed and do not include impact on local natural environment and no indication is given of the weightings accorded to the parameters or the reasoning for their inclusion and their weightings.**

P.5 Table 1.1

A.) The 'further detail' on Option 2 (SW's preferred one) is inadequate – access for construction and maintenance activities is actually **much more problematic than for Option 4**, where also no rock cutting would be involved.

B.) The required 'cut and fill' is only minimised in relation to option 3; **no comparison is given to the requirements of Option 4**, where it would be less.

C.) No indication is given of the extent or cost of the proposed rock-cutting in Option 2 and the suggestion that it will be 'reduced' during detailed design is therefore empty.

D.) **Option 4 does not even canvass the WCPS proposal that SW consider acquiring the residential property at No.20 Unwin St**, which would solve the problems identified (and simply assumed to be determinative). Nowhere is the size of Option 4 shown superimposed on the land adjacent to No.20, although concept design suggests it would be 5m from the house. Conclusion: **Option 4 has not been given full consideration** – this is further reflected in S3.2.1 on P16.

P.6 Figure 1.1

Option 4 is not even shown on this figure. It suggests that Option 4 was ruled out before table 1.1 and figure 1.1 were prepared. It is also noticeable that the size and shape of the proposal location is different from that shown later in Figures 2.1 and 2.2.

P.8 and Figures 2.1 and 2.2 Location of the facilities compound. The land at the western side of the location indicatively shown for the compound is part of the Wolli Creek Regional Park (a 5m strip of land from the base of the rock is to be included). It should be moved further away to avoid impacts from machinery and materials generated. Such a location would be relevant even if Option 4 were adopted.

P.15 S3.1 bullet 4. SW is committed to providing feedback on how WCPS input was addressed in the decision-making process. This has not been adhered to in this REF – see comments re Option 4 above - and was poorly dealt with in SW correspondences to WCPS. These have basically said “we went through a multi-criteria decision-making process and rejected what you suggested.”

P.22 S5.2.3 Option 2 requires the removal of 300 sq m of vegetation **60% of which is above the Track and “in very good condition”**. This is a tribute to the work of WCPS volunteers over many years and under licence from SW (no funding provided), who have worked on these very areas of bushland above the Track. It demonstrates the restorability of the remaining vegetation on the SW block and why it should be included in the Regional Park – only possible if Option 4 is adopted. The block is also a vital link between the bushland of the rocky outcrop and the rest of the Park.

It is also worth pointing out that although no currently threatened species are present other than *S.paniculata*, bushland in inner-city areas like this is itself a threatened entity, just not one yet recognised in the system used to assess sites like this. Some of the species present on the proposed location, like *S.paniculata*, are known feed trees for Grey-headed Flying-foxes, a significant colony of which is resident further upstream. That fact is also relevant to the claim that the *S.paniculata* present is a garden escapee. In fact there are specimens of the same species further up the Wolli Valley at Girrahween Park and at Bexley North, (where it occurs with Coachwoods and other rainforest species) and has been confirmed by Botanic Gardens botanists as remnant - so not at all beyond on its natural range on this site. Grey-headed Flying-foxes are well-known as pollinators and spreaders of rainforest species.

P.32 S5.2.9 “Cutting into the rock outcrop will...detract from the visual amenity of the area”. **No mention of the visual impact of the OCU itself.** That will remain, even if, over many years the unnatural rockface from cutting weathers into a similar patina to its present one.

P.36 S6 last para “The proposal will not result in the degradation of the quality of the environment” – not an objective statement and not one with which WCPS and the many walkers who use the area would agree at all. See also P.38 where the statement is repeated.

P.39 “Any increased demands on resources (natural or otherwise) that are, or are likely to become, in short supply.” **Bushland is in increased demand (figures for Wolli track usage in 2020 show an increase to 2 1/2 times that for 2019) and the proposal actually reduces the bushland (Option 4 would not).** The closure of the track for 8-9 months will frustrate walking groups, which come to the track from all over the Sydney Basin and from as far afield as Wollongong, the Blue Mountains, and the Central Coast. Much work would need to be done to give them advance warning of the closure – not needed under Option 4.

The REF provides little or no discussion of the ongoing impacts from the operation and maintenance of the OCU, which are likely to close access to the track for short periods.

General Observation

Sydney Water has a good reputation in the local area for environmental sensitivity and has put much effort and expenditure into vegetation restoration work on Johnston’s Creek and along the Cooks River, notably at Cup and Saucer Creek. This in

areas where there is no remnant or restorable native vegetation. At Unwin St, they seem set to do the opposite and remove “very good” vegetation and install something decidedly ugly, in an area where it cannot usefully be screened. The cost of avoiding this is the acquisition of a single residential block, by compulsion if necessary, which would save on other costs as partial compensation. It seems a great shame that they would skimp on this one and leave an enduring bad legacy.

Good interpretation boards, combined with an unobtrusive location for the plant, would be a good news story – showing the heritage SWOOS structure, the role of the OCU in preserving it, the general social role of sewage treatment, along with the saving of the bush and the completion of the regionally significant Wolli Creek Regional Park, while enhancing its eastern gateway.