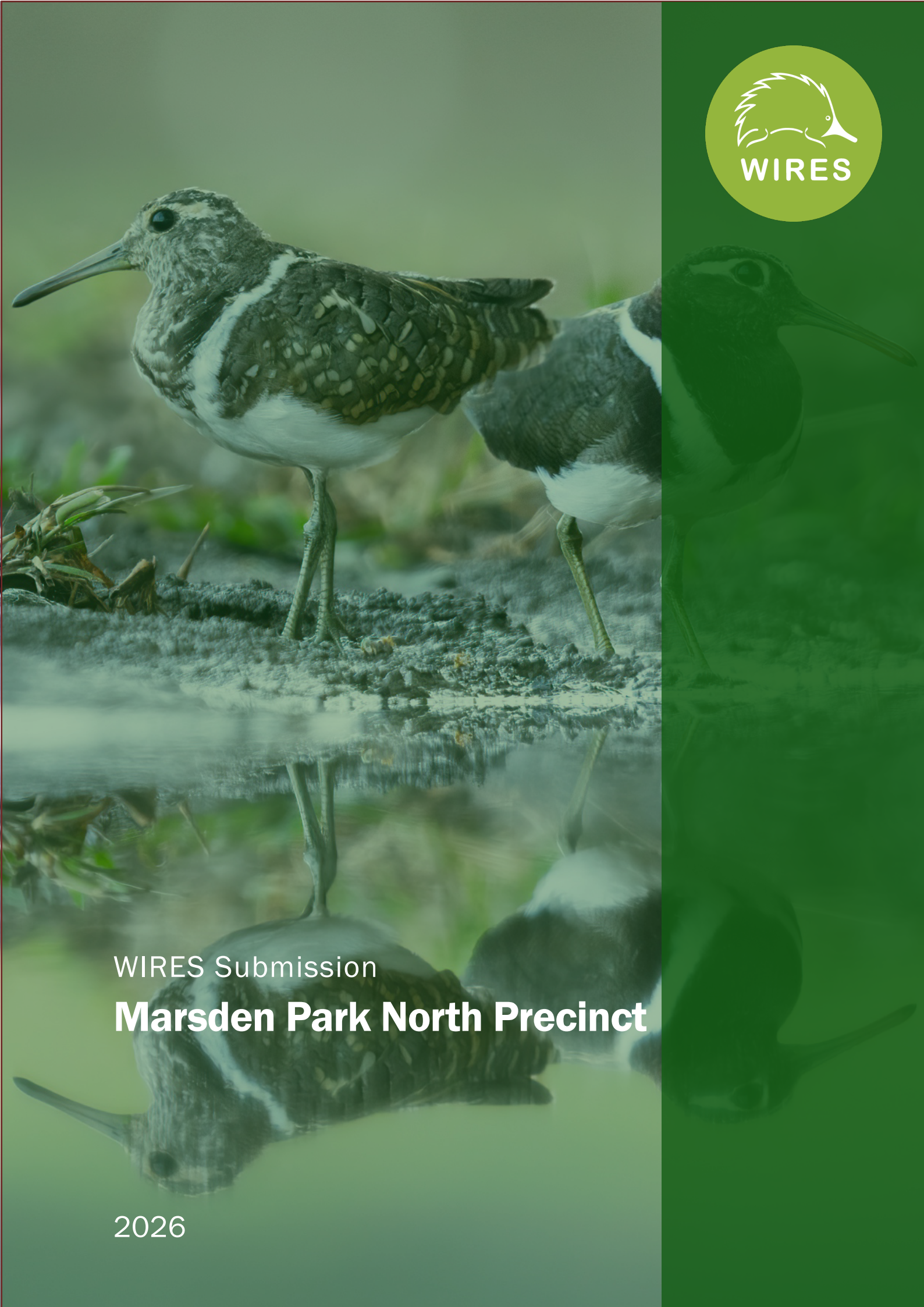


WIRES Submission

Marsden Park North Precinct

2026

About WIRES

WIRES is Australia's largest wildlife rescue organisation, and operates a dedicated Wildlife Rescue Office assisting wildlife and the community across Australia 24-hours a day, 365 days a year, providing rescue advice and assistance for over 230,000 animals in 2025, an 18% increase. We have around 4,000 dedicated volunteers as well as a fleet of Wildlife Ambulances operated by full-time, professional Emergency Responders.

In addition, WIRES trains hundreds of rescuers and carers annually, are dedicated to the ongoing recruitment of new volunteers and the continued training of existing volunteers. This growing network is critical for the rescue and rehabilitation of our unique native wildlife.

WIRES provides support for other organisations and individual carers Australia-wide, across major projects, food support, disaster relief funding, training, rescue communications systems, and the National Grants Program (NGP). WIRES NGP has been providing up to $1 million per year for wildlife rescue and rehabilitation projects across Australia since 2021.

Across NSW, the contribution of volunteers is estimated to save the government approximately $27 million per annum. This figure continues to grow.

Cover image: JJ Harrison (2023) Australian Painted Snipe, Wikimedia Commons. https://commons.wikimedia.org/wiki/File:Australian_Painted_Snipe_0A2A6045.jpg

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Executive Summary

The four ephemeral ponds known as the Riverstone Wetlands provide a home to an array of wildlife — including migratory birds, with several listed threatened, endangered and critically endangered species. The shallow and flood free waters provide a refuge for wildlife continually exposed to the ongoing impacts of habitat modification, degradation and destruction.

The Marsden Park North Precinct proposal does not reflect community expectations of government, will contribute to the worsening status of wetlands in NSW, and will increase the burden on the volunteer wildlife rescue and rehabilitation sector.

The existing ephemeral Riverstone Wetlands must be retained, with the proposed constructed wetlands in the riparian corridor comprising part of an additional and broader active restoration program.

Introduction

NSW Wildlife Information and Rescue Service Inc (WIRES) welcomes the opportunity to provide a brief submission on the proposal to remove the existing ephemeral ponds, known as the Riverstone Wetlands, as part of the proposed *Marsden Park North Precinct*.

The Riverstone Wetlands provide a home for our unique and precious wildlife. Those who live there permanently, and migratory species who travel huge distances to the refuge that the shallow and flood free waters provide. The wetlands are home to several listed threatened, endangered and critically endangered species, providing habitat which is increasingly more important due to the ongoing impacts of habitat modification, degradation and destruction — and the impacts of climate change.

The 2024 NSW State of the Environment report lists the indicators of *wetland extent*, *wetland condition*, and *waterbird abundance and breeding* as getting worse.

> *There is community expectation of government to approve projects which improve environmental protections and outcomes, not worsen them.*

Whereas the proposed Marsden Park North Precinct includes plans for a constructed wetlands and stormwater retention alongside and within riparian corridors to the northeast and west, these are included as a replacement for the current Riverstone Wetlands, not an addition. Doing so will negatively impact existing habitat. Ecologically, the constructed wetlands in and adjacent to riparian corridor will not support the same biodiversity. They will not match the habitat provided by the ephemeral nature of the existing Riverstone Wetlands, in-part linked to being exposed to flooding and other impacts.

Protected habitat, including wetlands, play a critically role in reducing the number of sick and injured animals requiring rescue and care. The direct, indirect and cumulative impacts of the proposed removal of the ephemeral ponds, as part of the Marsden Park North Precinct, will lead to additional burdens on the volunteer wildlife rescue and rehabilitation sector. A community service provided at a significant avoided cost to government, one already strained by the growing number of animals requiring rescue and care, and increased public concerns for and expectations about our unique and precious wildlife. [1]

[1] Haering, R., Wilson, H., Zhuo, A. & Stathis, P. (2018). Towards a more effective model of local wildlife care with the volunteer wildlife rehabilitation sector, *Australian Wildlife Rehabilitation Proceedings*.

The Marsden Park North Precinct proposal is not compatible with needed wildlife and environmental protections, including for the many threatened and endangered species who reside there. Any proposal must ensure the protection of the existing Riverstone Wetlands and remove the impacts on those species who call the area home — including migratory birds and the Green and Golden Bell Frog

> *The existing Riverstone Wetlands must be retained, with the proposed constructed wetlands being part of an additional active restoration program.*

Now is the time to revisit the Marsden Park North Precinct proposal to ensure the best possible outcomes for the community, for the environment, and for our unique and precious wildlife.

The Riverstone Wetlands

The ponds now known as the Riverstone wetlands were constructed in the 1970s, designed to reduce the environmental impacts of farmed animal operations, including a slaughterhouse. A key element of the design was to locate the ponds above the flood plain, to protect the ponds from inundation, and the mitigate the risk of industrial effluent being discharged into local waterways. The slaughterhouse ceased operations in the 1980s, with the ephemeral nature of the wetlands a key factor in hundreds of birds and other species choosing these ponds to call home.

The Department of Planning, Housing and Infrastructure's (DPHI) *Explanation of Intended Effects* for Marsden Park North (EIE) describes the Riverstone Wetlands as comprising 'four artificial ephemeral ponds.' The ephemeral nature of the wetlands — clearly noted by DPHI — are a key component of their biodiversity, their suitability for several species, and their broader importance in the landscape.

These shallow ponds are home to some of Australia's rarest wetland and shore birds, many staying and returning over decades. The Riverstone Wetlands provide a link between the estuarine mudflats of Homebush Bay and the wetland network of the Hawkesbury River.

The Department of Climate Change, Energy, Environment and Water's (federal DCCEEW) National Wetlands update in March 2023 discusses the ecological value of ephemeral wetlands, including

for threatened species.[2] The ecological importance of ephemeral wetlands is increasing as anthropogenic landscape impacts reduce the viability and occurrence of natural systems. The presence of wildlife in the Riverstone wetlands provide further indication of their importance in and across the landscape.

Critical to the importance of the Riverstone Wetlands as both standalone and interconnected habitat for wading birds and other species, when other sites are inundated due to flooding, is that they continue to provide shallow conditions.

The status of wetlands in NSW

Wetlands are ecologically important and continue to be 'threatened by intensive anthropogenic pressures.'[3] The NSW State of the Environment Report (SoE Report) includes *wetland extent*, *wetland condition*, and *waterbird abundance and breeding* as indicators of the status and trends in the environmental and ecological health of wetlands.

The 2024 SoE Report categorises the environmental trend for each of these indicators as 'getting worse', with only a small fraction of wetlands — 'critically components of a healthy environment' — being protected by the NSW government. For *waterbird abundance and breeding*, the environmental status is categorised as 'poor,' the lowest rating in the SoE Report.

The Environmental Protection Authority website includes the findings of the two prior SoE Reports, with these two reports also indicating little or no improvements in wetland indicators from management outcomes.

[2] DCCEEW (2023). Ephemeral creeks flowing again, Wetlands Australia 37: National wetlands update, March. Australian Government. https://www.dcceew.gov.au/water/wetlands/publications/wetlands-australia/march-2023/ephemeral-creeks-flowing-again

[3] See, for example, Liu, X., Watts, R.J. & Allan, C. (2023) Local ecological knowledge and wise use of ephemeral wetlands: the case of the Cowal system, Australia. Wetlands Ecology and Management 31, pp. 791–804. https://doi.org/10.1007/s11273-023-09950-3

Former industrials sites provide homes for our unique and precious wildlife

Recorded observations of more than 190 international migratory birds, 400 nomadic waterfowl, and other species including the Green and Golden Bell Frog (GGBF) in the Riverstone Wetlands are directly illustrative that former industrial sites provide suitable homes and refuge for our unique and precious wildlife.

Broader research has shown that former industrial sites across the greater Sydney area provide suitable, at times unexpected, habitat, for several species.[4] The Brick Pit at Sydney Olympic Park a well-known example, which included a restoration project that sought to accommodate GGBF in habitat and landscape they chose to call home.[5] The protection of Brick Pit at the Sydney Olympic Park sites is considered 'one of the most successful efforts to help the frogs' survival,' with reasons why GGBF choose former industrial sites still not known.[6]

Recent research by Liu, Watts and Allan, with a focus on the Cowal system, an ephemeral wetland in dryland Australia, highlights that local knowledge has significant value for the co-design of conservation plans and management decisions.[7]

[4] See, for example: NSW Department of Environment and Conservation (2007). *Management Plan for the Green and Golden Bell frog Key Population at Port Kembla*; Eco Logical Australia (2016). *Green and Golden Bell Frog Plan of Management - Arncliffe*. Prepared for NSW Roads and Maritime Service; Wade, C (2013). *Green and Golden Bell Frog Management Plan*, prepared for Morgan Cement.

[5] See, for example, Kerry, D, & O'Meara, J. (2008) *Olympic legacy: Green and golden bell frog conservation at Sydney Olympic Park 1993-2006*, Royal Zoological Society of NSW, Australian zoologist 34:3, pp.236-248; NSW Department of Environment and Climate Change (2008). Protecting and restoring green and golden bell frog habitat, DECC 2008/468.

[6] Bowring, D (2025). Brick-pit frog recovery another win for green and gold at Sydney Olympics site, *ABC News*, 14 September. https://www.abc.net.au/news/2025-09-14/green-and-golden-bell-frogs-thrive-at-sydney-olympics-site/105762124

[7] See, for example, Liu, X., Watts, R.J. & Allan, C. (2023) Local ecological knowledge and wise use of ephemeral wetlands: the case of the Cowal system, Australia. Wetlands Ecology and Management 31, pp. 791–804. https://doi.org/10.1007/s11273-023-09950-3

Retaining the existing Riverstone Wetlands *and* adding the proposed constructed wetlands

The constructed wetlands included in the Marsden Park North Precinct proposal are a welcome component of the enhancement and active restoration of the riparian corridors. The EIE notes that the creeks and riparian corridors 'have a moderate to low ecological condition' implicitly identifying the importance of prepared vegetation management strategies to 'restore, revegetate and rehabilitate the riparian corridors.'

The Marsden Park North Development Control Plan similarly identifies the importance of these riparian corridors: 'protection and restoration of creek health, ecology and biodiversity is a key policy for future development and delivery of the Blue-Green Infrastructure Network in the catchment' (p. 12).

Including the existing ponds with the dedicated ecological, environmental landscape, flooding and watercourse protection zone in the northern and western portions of the Precinct will provide additional protections of the listed species who call the area home — both all year round, and as part of their migration.

> *The proposed constructed wetlands must be seen as an addition to the existing Riverstone Wetlands — not as a replacement.*

The addition of the existing ponds, the Riverstone Wetlands, to the area managed by the Greater Sydney Parklands will lead to improved outcomes for the community, for the environment, and for our unique and precious wildlife.

Consultation with Dharug traditional custodians

Dharug Traditional Custodians must be involved in the co-design of conservation and management plans for any proposals including the Marsden Park North Precinct to ensure the protection of, and ongoing Connection to, Country is prioritised.

Conclusion

The proposed removal of the ephemeral ponds known as the Riverstone wetland is incompatible with the protection of our unique and precious wildlife, including many threatened and endangered species.

The importance of the Riverstone Wetlands is clear, and they must be retained. The proposed constructed wetlands must be seen as an addition and not a replacement, to the habitat the Riverstone Wetlands provide. The proposed constructed wetlands must form part of an broader active restoration program.

Removing the Riverstone wetlands — as proposed — will increase the burden on the volunteer wildlife rescue and rehabilitation sector. A sector which provides a valuable public good, and operates at a significant avoided cost to government.

> *The Marsden Park North Precinct must be reconfigured to retain the existing Riverstone Wetlands and avoid and additional impacts, including the proposed road.*

Now is the time to revisit the proposal for the Marsden Park North Precinct to ensure the best possible outcomes for the community, for the environment, and for our unique and precious wildlife. We hope, as the Hon. Minister Scully stated, that 'submissions will be carefully considered to inform the final plans for the Marsden Park Noth precinct, including the settlement ponds.'[8]

[8] Bowring, D (2026). Conservationists alarmed by plan to remove rare bird habitat in Sydney's north-west, *ABC News*, 19 January. https://www.abc.net.au/news/2026-01-19/conservationists-alarmed-riverstone-wetland-replacement/106227536

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