

NWPA Objection to the Variation of License requested by Solo Water Pty Ltd.

Concerns Identified:

- **No environmental Impact Study planned**
- **A downgrade to the level of treatment of sewerage**
- **Waste requested to be managed off site and to impact on the State Heritage township of Catherine Hill Bay, both private houses and beach**
- **Over one million litres of waste per week to be poured into a small creek creating a permanent wet land of possible raw sewerage leading to disease, mosquitoes, malodour and general pollution**
- **Incorrect assumptions and misleading presumptions regarding the beach site, the current requirements and the current approvals**
- **Cost cutting by the developer and now Solo Water when the issues were known years ago**
- **Note; The residents in the heritage listed area of CHB pay for their waste to be removed and have no impact on the local environment and beach.**
- **Any application for the licence down grade is in conflict with many government departmental statements: Please note these extracts from each policy at the end of this submission.**

A request for a Variation to License 16_035 should require a mandatory Environmental Impact Study.

The current licence states that “All wastewater produced in the scheme is managed onsite within the footprint of the approved residential subdivision by a combination of non-potable reuse at individual lots and via controlled irrigation of public space .

This development has been planned, discussed and actioned over the past 10 -15 years – Rose Corporation have been well aware of the issue of effluent but only now, when 300 houses are under construction, do they apply for a variation to the original license.

There should be no discharge into the environment. **All treated effluent that cannot be reused on the residential site should be trucked to Swansea/Belmont where it can be discharged into the deep-sea outlets or the owners of the sewerage plant could build a pipeline that discharges their excess effluent into an existing wastewater system connected to an ocean outfall discharge system.**

The treated effluent generated by the new residential development should **never** be discharged into a totally different catchment area that is part of a State Heritage listed township, none of whose houses are connected to the water and sewerage system built and operated by Catherine Hill Bay Water Utilities Pty Ltd (Solo Water).

This variation application is deeply flawed and should not be granted.

The reasons we believe there should be NO variation to the original commitment of the network Operator are:

Health, amenity and environmental ruination

Catherine Hill Bay and surrounding local residents should NOT have to pay the price for the developer to cost cut and ignore amenity and health concerns for residents and visitors.

The potential impact on the environment if this proposal were to proceed would be disastrous and have an impact on not only the environment but the health and welfare of the residents living at Catherine Hill Bay and the great number of visitors to the pristine beach. If a Variation should come under any consideration a robust Environmental Impact Study should be mandatory. Of great concern is the explosion of mosquitos and associated diseases.

It would have been clear years ago that the Applicants plans for sewerage were not sustainable in the long term without accessing existing sewerage outlets.

Now the operator is seeking a variation which will allow them to discharge more than 162,000 litres a day into the environment **outside** of the development area. The discharge will be in a different catchment area to the process plant, into an artificial "wetland" and stream that ends up on the beach at Catherine Hill Bay. And yet the applicant states that, "The additional flows due to SDRW release are unlikely to be significant under the proposed release management system."

Catherine Hill Bay is the closest beach to Nords Wharf and our children attend the surf club and nippers there – raw sewerage, the malodourous area and an infected, stagnant lagoon will mean, in the future, the general amenity of the area ruined.

Impact of downgraded sewerage to the Historic Village of CHB

The assertion that "the excess water will flow through a coastal lagoon which has been estimated to be open to the ocean some 73% of the time is totally untrue. **The lagoon has not been open to the sea at all this year (2018).**

Therefore, following the logic of how effluent will be managed the applicant states the 'Dry release will be to the beach lagoon at a rate of which inflow of the SDRW matches the beach lagoon outflow.' As the lagoon has not been open to the sea at all this year it means that there would be NO dry release of effluent into the lagoon this year – what would they do with the effluent?

Effluent being the 'liquid waste material that comes out of factories or sewerage works' – (please note the word LIQUID) definition from Collins Dictionary. Our concern is that the company will fill the back of the creek, lagoon and Catherine Hill Bay beach with offensive and dangerous sludge effluent. In storms, the houses on Flowers Dr have issues with water entering their property. Add 1,134,000 per week – more than one million litres a week -(162,000 litres daily) as well as a storm these properties could be inundated with raw sewerage.

CHB beach and lagoon is used by the families and children of Catherine Hill Bay and visiting children from Nords Wharf, Murrays Beach, Cams Wharf, Gwandalan, Chain Valley Bay, Summerland Point as well as new Beaches

residents and surrounding areas. If this lagoon is filled with effluent, particularly 'dry' release effluent directly into the lagoon, it will be not only unsafe for all residents and beach goers, but any native animals that rely on the lagoon and creek for water. When the ocean is rough, children swim and play in the lagoon.

Hunter Water identifies times when their system does not meet requirements and when unsafe and raw sewerage is discharged - Solo Water will NOT be able to guarantee their system will not break down and raw sewerage is discharged on to Catherine Hill Bay beach. The applicant is requesting approval to DOWNGRADE it's process for treating sewerage and it is inevitable that raw sewerage /faecal matter will be discharged making the impact on public health, public safety and the environment disastrous. A prime example here is Burwood Beach with raw sewerage during heavy rain and storms.

As Nords Wharf Progress Association we would expect a full and independent Environmental Impact Study attended before this matter goes any further.

Yours Sincerely,

Pam Percic
NWPA Secretary

*"The developer creating the population increase be required to ensure
pre-existing residents don't suffer diminished quality of life.*

*New development should be safe, comfortable, sensitive to the environment
and overall positive for the existing community.*

We expect our government to safeguard this.

Anonymous

Any application for the licence down grade is in conflict with these government departmental statements: Please note these extracts from each policy - full information is available on each web site.

Lake Macquarie Council

2.2 Our Goal

Our goal is to sustain an environment that is diverse and inspiring, minimally polluted, and supportive of the city's economic and social needs. We aim to contribute equitably to local and global environmental sustainability.

Hunter Water

4. Hunter Water is committed to "Undertaking measures to prevent pollution and minimise or mitigate any adverse impacts operational activities may have on the environment

About the NSW EPA - Our organisation

The NSW Environment Protection Authority (EPA) is the primary environmental regulator for New South Wales. We partner with business, government and the community to reduce pollution and waste, protect human health, **and prevent degradation of the environment.**

Policies, Guidelines and Programs - Risk-based framework for considering waterway health in strategic land-use planning

When these changes are not well planned and managed they can lead to algal blooms and excessive aquatic weed growth resulting in degraded waterways that the community cannot always use for desired uses such as recreation, commercial activities and for healthy aquatic ecosystems.

Planning and Environment - Coastal management

<http://www.environment.nsw.gov.au/topics/water/coasts/coastal-management>

<https://www.ipart.nsw.gov.au/files/sharedassets/website/shared-files/licensing-policy-cross-industry-review-of-ipart-compliance-and-enforcement-policy-2017/ipart-compliance-and-enforcement-policy-december-2017.pdf>

We support councils and communities in managing the open coast, estuaries and coastal lakes.

The NSW Government's vision is for thriving and resilient communities living and working on a healthy coast, now and into the future.

The NSW Government has established a new coastal management framework to manage the coastal environment in an ecologically sustainable way, for the social, cultural and economic **well-being of the people of New South Wales.**

Our role

The NSW Government, through the Office of Environment and Heritage (OEH), provides oversight of the State's coastal management program. OEH is the first point of contact for local councils planning to prepare and implement a CMP.

OEH will continue to work in partnership with councils and local communities to manage the coast.

OEH can help councils preparing a CMP with the following data and technical advice:

- wave data and data on historical coastline changes

- information on coastal and estuarine processes, sediment cells and coastal geomorphology/coastal engineering information on coastal hazard and risk assessment
- advice on ecosystem health and habitat mapping.

OEH administers the [Coastal and Estuary Grants program](#) that provides funding for councils to prepare and implement their coastal management program.

Cc Yasmin Catley MP
Cc Lake Macquarie Council Mayor Kay Fraser
cc Councillor John Gilbert
cc Councillor Nick Jones
cc Councillor Adam Schultz
cc Councillor Christine Buckley