

Catherine Hill Bay Progress Association And Dune Care Inc

Catherine Hill Bay Progress Association
PO Box 72
Swansea NSW 2281

16th, October 2013

SUBMISSION RE: THE GRANTING OF A NETWORK OPERATOR AND RETAIL SUPPLIER LICENCE TO CATHERINE HILL BAY WATER UTILITY PTY LTD

This is an amended submission by the Catherine Hill Bay Progress Association.

The Catherine Hill Bay Progress Association has the following concerns:

1. Impact on the Heritage Listed Township of Catherine Hill Bay

. The town of Catherine Hill Bay is a State Heritage Listed town - only the second town in New South Wales to be placed on the State Register.

This proposed sewerage plant will be **visible** to all people entering the heritage township from the south. Any Sewerage Treatment Plant should be sited elsewhere.

A back-up power plant and **noise** controls are not mentioned or shown on the plans. Due to the proximity of residences the whole plant should be enclosed and subject to **odour** control measures. The proposal does not address this and no space is shown for odour control. Is this best practice?

Any infrastructure needs to be respectful of the heritage nature of the town, and its high volume of tourism.

2. Environmental Impacts

The proposed Sewerage Treatment will affect the National Park, coastal bushland, creeks, cabbage tree palm groves, caves, cliffs and beaches which surround the proposed development.

The plant is specified as 2000EP (4.3.5) At a hydraulic load of 150l/p/d is 300,000 l/d. This is equivalent to just over 3 people on average per property. This appears to be significantly undersized for holiday loadings. The sizing infers that neither holiday peaks nor wet weather flows will be treated, unless there are significant buffer tanks. The plan infers that there is no discharge other than by road or by a third pipe, as no easement corridor is shown for wet weather overflows.

The influent appears to have insufficient controls to buffer the size of the plant specified. Recycled water, if not taken by residents, will have to be discharged in wet weather to common ground which may be water logged.

It is proposed to release 40% of the treated sewage onto public space yet in this tightly packed subdivision there is very little public space; only two small pocket parks.

Previously the Approval for this subdivision was given on the basis that recycled water alone would be discharged onto these two small areas and the sewage would be pumped to Swansea. Can this small area cope with recycled grey water and recycled sewage? These two parks sit above a SEPP 14 wetland which then flows into the sea.

The proposal submitted gives no guarantee that the Advanced Treatment Plant will be installed, it is conditional. This would put even more pressure on the subsurface drains to 'parkland' to take the recycled effluent produced by the plant.

The Association is also concerned with the absence of a Bushfire Risk Assessment. Given the proposed location of the Sewerage treatment Plant this should surely form part of the submission for approval.

It would be unacceptable if the granting of this licence resulted in a poor environmental outcome.

The Regulator must ensure that best practice technology is used in this area of heritage significance and environmental sensitivity.

Yours faithfully,

Suzanne Whyte
President
Catherine Hill Bay Progress Association