

I wish to object to the proposed plan for handling the sewage at the proposed development at Catherine Hill Bay. Development Consent (Major Project) MP10/0204.

My objection is on the following grounds.

### Size of plant.

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 3<sup>rd</sup> pipe, as no easement corridor is shown for wet weather overflows. This appears highly impractical.

The capacity to expand is also restrained by boundaries.

### Controls.

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. Traffic movement of chemicals to, and effluent from, the plant is to be along the main access road to the plant. Back-up power plant and noise control are not mentioned or shown on the plans.

The whole plant, being close to resident should be enclosed and subject to odour control measures. This is not mentioned and no space is shown for odour control, either by chemical scrubbing or by soil bed use.

### Experience of applicant.

Neither the company applying for the licence nor the company providing the plant is listed in the 2013 Water Directory of the significant members of the water industry in Australia. They are not companies of recognised experience. Harvest Water, by its own website is a self confessed, "newly formed, .. with a vision of being small..", therefore of questionable suitability for providing a long term sustainable solution to a significant heritage coastal village of NSW. It is highly unlikely to have the necessary significant practical experience in running plan..

Initial approvals mentioned Hunter Water as the utility provider ( Development Consent (Major Project) MP10/0204). As it was mentioned it is presumably part of the initial substantiation of the case. Solo Water would not have provided the necessary experience and security to enable the development to be accepted.

HW being in public domain has proven transparency, quality control systems, engineering backup, and practical plant control experience. It has in depth 24 hour response teams as well as central data collection, with systems set up to give back up in case of fire, or vandalism, or process problems.

The application submitted to IPART states in 3.7.1 last dot point that CHBWU "operating and maintaining all infrastructure ...on best practice principles..." yet neither CHBWU nor Solo Water are members of the main body representing the water industry in Australia, the Australian Water Association, where the best practice and principles are determined and discussed.

## Unsubstantiated claims.

Unsubstantiated claim in 3.7.1 stating “lower in cost...than Hunter Water...” If considered whole of life, with power, maintenance, chemical use for membrane CIP and membrane replacement, with HW knowledge of running plant and purchasing power, and experience, specifically with local STPs including MBR as at Paxton STP, this claim is both unlikely and unsubstantiated.

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 RE produced by the plant.

In paragraph 3.7.1 it is stated that CHBWU encourages competition, however, the application does not state there will be an open tender, not does it refer to asking HW to submit a proposal.

## Loss of community asset.

The Sewage Treatment Plant is proposed for the development, not for the benefit of the whole local community, who will be subject to the disruption of construction, inconvenience of traffic movements of chemicals and pollutants, noise, odour, biological aerosols.

Furthermore, the provision of water from a pipeline that could be used for the benefit of the whole community (ex Wyong Shire Council) that is intended to be for the exclusive use for a specific development should not be considered. This transfer of an asset for exclusive use is unconscionable.

I trust that this application will be reconsidered and either the provision of services be by the local authority for the benefit of the whole community who will be disrupted, or if it is to be specifically for the development then it should be undertaken by the local provider of services, (Hunter Water) with the necessary capacity and controls to include the whole community at a later date. The potable water supply should not be transferred to private ownership.

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