



BN15/1512
ER23398

Independent Pricing and Regulatory Tribunal
PO Box K35
Haymarket Post Shop
NSW 1240

Attn: Erin Cini

Dear Ms Cini

Submission in regard to Review of Environmental Factors – Licence Application under the *Water Industry Competition Act 2006* by Catherine Hill Bay Water Utility

Thank you for the opportunity to review the Review of Environmental Factors submitted in conjunction with an application under the WIC Act 2006 by Catherine Hill Bay Water Utility. The NSW Office of Water has reviewed the project documentation and provides the following comments.

- It is requested that the Recycled Water Management Plan to be prepared following DA consent is prepared in consultation with the NSW Office of Water.
- Monitoring plans should be developed for Effluent Quality, Recycled Water Quality and the Irrigation Scheme (including monitoring of soil, surface water and groundwater), and should identify thresholds, triggers and response plans for exceedences of thresholds. The plans should enable identification of trends in relation to changing water quality of ground water and surface water, and identify actions to protect the water sources.
- Riparian corridors should be established and maintained in accordance with the NSW Office of Water's *Guidelines for Riparian Corridors*. It is requested that a Vegetation Management Plan be prepared for the riparian corridors in accordance with the NSW Office of Water's *Guidelines for Vegetation Management Plans*.
- The evaporation ponds associated with the Reject Reverse Osmosis plant are modelled to overflow in 6% of years. Management measures are required to be implemented to avoid/minimise overflows, and to minimise impacts to groundwater, surface water and waterfront land resulting from overflows.
- The proposed 2ML wet weather storage tank for treated effluent is predicted to overflow in 38% of years. Management measures are required to be implemented to avoid/minimise overflows, and to minimise impacts to groundwater, surface water and waterfront land resulting from overflows.

- The proposal refers to potential offsite discharge of surplus recycled water to either trade waste or the environment, including potential discharge to ocean, sand dunes, groundwater, or Middle Camp Creek. The proponent should provide detailed assessment to show that the proposed discharge option does not result in more than minimal harm to the environment. Appropriate monitoring and reporting parameters must also be determined.
- Condition B(24) of the Consent for the subdivision may require modification as Hunter Water will no longer be the Water Supply Authority servicing the site. The proponent may be required to lodge an application for Modification of Minister's Approval under the *Environmental Planning and Assessment Act 1979*.

If you have any queries, please contact Alison Collaros, Senior Water Regulation Officer in our Newcastle office on 4904 2527 or by email Alison.Collaros@dpi.nsw.gov.au.

Yours sincerely

Mitchell Isaacs
Manager Strategic Stakeholder Liaison
17 April 2015