

## **Objection to “Catherine Hill Bay - Network Operator Variation (Variation)”**

**From: David Goff**

I strongly object to this variation mainly on the grounds that the operator is proposing a significant change to the scope of its operations by disposing of waste produced within The Beaches Estate to areas outside of that estate. Of most concern is that the proposed discharge is into the NSW Heritage listed village and into the lagoon and thence the ocean closely adjacent the area of highest beach use at the surf club end.

A cursory review of the original licence application documentation shows that the sewage treatment plant as currently designed and built was never sufficient to support the full development of Beaches areas 1 through 7 and the proposed simplistic solution to dispose of any excess “somewhere other than where it was generated” shows a greedy and callous disregard for people and environment outside of The Beaches estate.

Looking at the way sewerage is dealt with within the new development and how it is dealt with in the existing Heritage Village, both places have the same problem and essentially the same solution. Neither are connected to Hunter Water’s reticulated sewerage system and rely on “septic tank” systems. The key characteristic of these systems for the Heritage residents are that they are licensed by the local council and their operation is strictly controlled via either, a full pump-out service with all waste trucked away for proper disposal or via an enviro system where water is recycled (via lilac pipe) onto their gardens – FULLY WITHIN their own property. It would be unthinkable for any Heritage village resident to ever propose to dispose of any part of their sewerage (treated or untreated) onto anyone else’s property.

So, in summary, whatever solution is proposed by Solo and authorised (by IPART &/or the EPA), all by product of their processing system should either be recycled within the confines of the Beaches estate or trucked off site for proper disposal. Cost SHOULD NOT be a determining factor, Heritage village residents who operate fully pumped-out septic systems are charged \$1, 200 IN ADDITION to their normal rates for council organised regular pump-outs.

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**Below are some supporting arguments picked from Solo Water’s Documents off the IPART Web site.**

These indicate Solo’s commitment to contain their operation within the boundaries of The Beaches development. A commitment that they should continue to honour.

### **[supporting-document-variation-appendix-3-including-ref-addendum](#)**

The third paragraph on page 9 of this document states:

“The granted WICA approval is

for 470 lots with onsite irrigation, with allowance for expansion to 550 lots subject to EPA discharge licence approval.”

This would mean that not only would a (modified) licence from IPART be required for this variation to proceed but also a formal application and review process with NSW EPA would be required.

### **[Original Application Form](#)**

[https://www.ipart.nsw.gov.au/files/sharedassets/website/trimholdingbay/application\\_form\\_-\\_wica\\_licence\\_application\\_-\\_catherine\\_hill\\_bay\\_water\\_utility\\_pty\\_ltd\\_-\\_wayne\\_williamson\\_-\\_july\\_2013.pdf](https://www.ipart.nsw.gov.au/files/sharedassets/website/trimholdingbay/application_form_-_wica_licence_application_-_catherine_hill_bay_water_utility_pty_ltd_-_wayne_williamson_-_july_2013.pdf)

### **Section 4.2.3:**

All proposed non-potable water infrastructure for the Catherine Hill Bay Water Utility scheme is contained within the approved footprint of the Rose Property Group residential subdivision. Layout plans showing the location of all non-potable water infrastructure are provided in Appendix 4.2.3.

The wastewater treatment plant site that contains the AWTP, storages and booster pump station is located on the western edge of the approved development adjacent to Montefiore Street. Non-potable

water reticulation mains supplying each customer are located within the road reserve in a common services trench throughout the subdivision.

Revision of the existing development approval is being undertaken to specifically include all required non-potable water infrastructure. Following this the Lot and DP numbers for the WWTP site and pipeline easements etc will be available.

### **Section 4.3.1:**

The Catherine Hill Bay Water Utility scheme will provide a full sewerage solution within the approved footprint of the residential subdivision.

Ref Confidential Appendix 4.3.1

### **Question:**

If a treatment process forms part of the infrastructure for which the applicant corporation is seeking a licence, what waste streams will be generated by the proposed treatment plant (such as screenings and biosolids but not including the treated effluent) and how will the waste be disposed of or handled?

### **Solo Response:**

Waste Stream:

Waste Activated Sludge

Characteristics:

Waste activated sludge (WAS) with high Mixed Liquor Suspended Solids (MLSS) of around >13,000 mg/L. The MBR will produce WAS at around 1-2% of inflow, or around 3-5 kL/day. The MBR operates at a long sludge age and the sludge produced will be relatively stable compared to conventional sewage sludge.

Management Strategy:

When the MLSS reaches 13,000 mg/L WAS is temporarily stored onsite in the WAS Tank and trucked offsite to the nearest accepting facility using Solo Waste Recovery liquid waste vehicles.