

Response to IPART/Solo Water/CHBWU's application for an amendment to their licence:

FROM: LINDSEY GOFF

I am definitely opposed to Solo Water/CHBWU's application for an amendment to their licence.

It appears to me that Solo Water is taking the easy and cheap way out to fix their problem. Surely, before a development as large as Beaches is allowed to go ahead, something as important as the sewerage system should have a set of criteria, which show it as being capable to cope with ALL eventualities and for the TOTAL number of homes being built.

Obviously all THREE stages of Solo Water's sewerage treatment plan should have been in place before ever starting their operation. As seen in the quote below (from the original licence application) LMCC had concerns, which have now become a reality.

'Stage 3: LMCC does not support the exclusion of Stage 3 from the current assessment. Stage 3 will involve the activation of Stages 6 and 7 of the subdivision, which is likely to require additional treated effluent irrigation area (unidentified at this stage). By excluding Stage 3 assessment, the proponent is unable to demonstrate that the utility can effectively function in the longer term. LMCC's concern is that the water balances for Stage 3 will result in a surplus treated effluent with no available mechanism for disposal.'

It seems irresponsible of Solo Water to be requesting an amendment when there are still 2 stages of Beaches development to go. Did they give no thought to where all the treated effluent was to go once all homes were built?

It is difficult to comprehend why the Heritage Area of Catherine Hill Bay should have to suffer environmentally and health-wise, when the problem is solely to do with the Beaches development. National Parks and Wildlife have already stated that they do not want treated effluent flowing on to their land, or into Moonee Beach creek, so why would Solo Water think that it would be okay to send their excess effluent into the creek at Catherine Hill Bay beach? Surely this would be just as bad environmentally, as well as causing possible health problems to residents and visitors at the bay.

'The REF should be amended to include commitments for the monitoring and review of soils, surface water and groundwater in areas potentially affected by effluent irrigation, including downstream environments.'

'In considering whether or not a licence is to be granted, and what conditions are to be imposed on such a licence, regard is to be had to the following principles: – the protection of public health, the environment, public safety and consumers generally'

It would appear from the quotes below, (from the original licence application) that CHBWU are now trying to go back on their previous statements of not disposing of excess non-potable water outside the development area. The rules for Stage 3 should be the same as were set for Stages 1 and 2.

‘CHBWU no longer intends to dispose of excess non-potable water onto publicly owned land. During high rainfall events, any overflows from the wet weather storage tanks will be transported to nearby disposal facilities to prevent water logging and associated issues arising within the subdivision. ‘

CHBWU has since revised its proposal so that it no longer intends to dispose of any treated effluent onto LMCC owned land. Any excess non-potable water generated in stages 1 and 2 of the scheme will be disposed onto land within the development, owned by Coastal Hamlets.’

‘Clause 15 of SEPP 71 states:

The consent authority must not consent to a development application to carry out development on land to which this Policy applies in which effluent is proposed to be disposed of by means of a nonreticulated system if the consent authority is satisfied the proposal will, or is likely to, have a negative effect on the water quality of the sea or any nearby beach, or an estuary, a coastal lake, a coastal creek or other similar body of water, or a rock platform. The REF has not considered SEPP 71, or the potential for overflows, accidental discharges or pollution of nearby waterways and coastal waterbodies from the proposal. The REF should be amended to consider SEPP 71’.

‘CHBWU’s proposal to irrigate treated effluent over future residential land (stages 6 and 7) is not a desirable outcome as there is the potential for public health and safety to be compromised by irrigating the treated effluent over land that will subsequently be developed for residential use.’

Reading the following quote (from the original licence application) it would appear that maybe Stage 3 should not go ahead until CHBWU/Solo Water have produced a more effective sewerage treatment design:

‘CHBWU has clarified that if Stage 3 of the water supply scheme is pursued, treated effluent will be disposed to the environment. It will not rely on irrigation of private or public lands. If CHBWU is granted a network operator’s licence, it will use operational data obtained during stages 1 and 2 to design Stage 3 effectively. If Stage 3 is not approved, stages 6 and 7 of the subdivision, as approved under the development’s Part 3A approval (MP10_0204) will not proceed and treated effluent will continue to be disposed onto private lands.’

Insufficient capacity of treatment system – as described in Section 2 of the REF, the proposed works will provide capacity for treatment and reuse or discharge of wastewater from 470 ETs. Full development of the subdivision is not achievable without further development of the wastewater irrigation areas and/or offsite disposal of waste water. Further environmental impacts associated with the wastewater and recycled water system will occur if full development of the subdivision proceeds (refer to Section A1.1.3 for more details)