

Department of Planning, Housing and Infrastructure

Our ref: SSI-56980459

Attachment A – Submissions Report Requirements

The Submissions Report (SR), must address the following issues identified by the Department:

All issues raised by government agencies in their advice.

All issues raised in public submissions and feedback (feedback attached as Appendix B) by members of the public, interest groups and Council.

Key Issues

Project Description

- Please provide plans that show in sufficient detail the works which are proposed to be undertaken at, adjacent to, or under all land. For example, will under boring be undertaken beneath any private property?
- Reference is made to an amount of wastewater that would be transferred from Council's existing wastewater treatment plant to the proposed Thrumster treatment plant for treatment to a higher level than available at the existing treatment plant.
 - o How much wastewater would be transferred to the proposed Thruster plant?
 - o Would this result in decreased discharges of less treated wastewater to Kooloonbung Creek?
 - o What would be the combined volume of wastewater that would be disposed of to Kooloonbung Creek from the existing treatment plant and the proposed Thrumster treatment plant?
- Please provide an Environmental Risk Assessment that has been updated from when provided at the Scoping Report stage, and as required by the SEARs for inclusion in the EIS.
- Provide an updated Cumulative Impact Assessment that considers known projects beyond those listed on the Major Projects site. For example, has Council approved any sub-divisions that should be considered?

Biodiversity

- Detail the proposed rehabilitation that would be outlined within a Vegetation Management Plan.

Department of Planning, Housing and Infrastructure

- Any proposal to fund a biodiversity conservation action.
- Confirm if a biodiversity stewardship agreement is required, and if so, provide the draft details of the agreement.
- Justify why and how works are proposed to be undertaken within the identified biodiversity stewardship site to the east of the airport.
- Confirm if the project will impact on National Parks, or other sites protected for ecological reasons.

Aquatic Ecology

- The wave and current regimes are not clearly addressed with regards to aquatic ecology. Provide additional information outlining wave and current in relation to impacts on aquatic ecology.
- Outline how surrounding landuses may affect the aquatic environment.
- The photos provided in Technical Report 6 are not at high and low tide as per the SEARs. Please update as required.
- The cumulative impacts to aquatic ecology do not appear to have been adequately addressed. Aquatic ecology is not specifically addressed within Section 24 of the EIS and other developments and cumulative impacts are not addressed within the aquatic ecology assessments.
- Are any offsets proposed to be applied? Provide information about how offsets may be proposed to be applied.

Water Quality and Hydrology

- Provide an estimate of the volume of tidal water that passes the hydraulic gradient change at the Gordon Street Bridge in a typical tidal cycle, compared to the volume of additional treated effluent that would be disposed of to Kooloonbung Creek each day.
- Provide an estimate of the increase in height of the water level in Kooloonbung Creek due to the additional effluent that would be disposed into the Creek.
- Provide details of final stormwater drainage arrangement for the WWTP and recycled water facility. It is not sufficient to defer this to be developed with a CEMP.
- Provide the proposed operational hydrology monitoring locations, as the proposed locations are not clear.

Department of Planning, Housing and Infrastructure

- Provide details of any Water Access Licenses that may be required for dewatering activities.
- Provide details of where creeks will be crossed and the proposed construction methodology. If trenching of creeks is proposed, justify why a less intrusive methodology was not chosen.
- Provide additional information relating to potential flooding to the south of the proposed site. This should include a level of information that is consistent with what has already been provided.

Noise

- Justify why the noise logging locations were chosen. Section 3.1 of the Noise Technical Assessment identifies that noise logging locations are representative of worst-case scenarios, yet the locations in Figure 3.1 do not seem to represent appropriate noise monitoring locations.
 - o For example, why is location CT-04 located away from the proposed project alignment as this does not represent a worst-case scenario for the closest residences?
 - o Table 3.2 and Figure 3.1 do not appear complete. Are there any noise sensitive receivers that have been identified along the alignments to the east of the airport?
- Justify why and how the boundaries of the noise catchment areas have been selected, as it appears that substantially different landuses within some catchment areas that are not consistent with the rest of the catchment.
- Would there be any concurrent construction activities associated with the Cowarra project and how would these concurrent activities impact on noise levels?
- Provide an updated report to address queries.

Land Use Conflict Risk Assessment

- A Land Use Conflict Risk Assessment (LUCRA) does not appear to have been provided. Appendix A (SEARs requirements) identifies that Chapter 18 includes a Land Use and Conflict Risk Assessment (LUCRA). Chapter 18 refers to Technical Report 13 – Land Use and Property Impact Assessment (GHD, 2024). Technical Report 13 is a Landscape Character and Visual Impact Assessment and specifically does not include the SEARs requirements needed to address a LUCRA.

Department of Planning, Housing and Infrastructure

- Please provide an appropriate LUCRA that addresses all requirements, including non-Council owned impacted Lots and DP. This should include plans at a sufficient scale to allow an understanding of the works proposed on, adjacent or under, each non-Council owned lot.
- Clarify with tabled data all affected properties (including Lots already listed) to include Lot, address, zoning, land use, freehold status, and a brief description of the project's impact on it.

Public Health and Safety Assessment

- The figures do not appear to be consistent or necessarily applicable. Figures 6.2 and 6.3 of Technical Report 12 are not specifically relevant to the type of work where dust generation is likely to be from the ground. (i.e. not a smokestack).
- Confirm and detail the consultation that has been undertaken with the Food Standards Authority regarding the potential impacts of discharge of effluent to the Hastings River and the surrounding oyster leases.

Social Impact Assessment (SIA)

- Were Aboriginal groups consulted in terms of impacts to social values as part of the SIA? Particularly for matters outside the scope of the ACHA, such as connection to Country (including waterways) and cultural landscape? (SIA guideline section 4.3).
- Were Aboriginal groups to the north of the Hastings River consulted?
- Please provide further detail on the Stakeholder groups consulted (section 3.2), including:
 - how these groups represent a broad cross section of the community in a manner consistent with the SIA principles identified in table 3 of Appendix A to the SIA guideline
 - how this engagement canvassed all relevant views, including those of vulnerable or marginalised groups
 - any data limitations or assumptions made
- Section 5.1.2.1 - please provide further detail on duration on social impacts of constructing the pipeline, including duration of impacts.
- Table 5.2 notes key features along the pipeline including potentially vulnerable groups (i.e. elderly people) - please provide further detail on how the SIA has considered how impacts will be experienced and any specific mitigation measures.

Department of Planning, Housing and Infrastructure

- Provide further clarification of the social benefit from changes to sewage treatment and non-potable water supply access, how it would be experienced and identify those groups who would experience it.
- Considering the likely duration and timing of construction for different components of the project, clarify the level of potential flexibility of construction timing, sequencing, footprint and approach for each component.
- Consider if specific actions should and could be taken to avoid/reduce/manage construction noise, vibration, access and safety impacts, particularly for the identified sensitive social infrastructure (schools and aged care).

Ecologically Sustainable Development

- Provide the environmental mass balance for the project and life-cycle strategies, developed in consultation with the NSW Environment Protection Authority (EPA) (refer Secretary's Environmental Assessment Requirements (SEARs) Key Issue 23).

Soils and Contamination

- The development area includes works within mapped acid sulphate soils. Provide details of proposed treatments and methods of disposal.
- Provide an up-to-date projection of coastal erosion and recession. The studies that have been referenced are not up to date and should include the NSW Coastal Management Manual 2018 and the latest IPCC projections.
- Please include updated details of erosion and sediment control measures that are applicable to soils and contamination.

Traffic and Transport

- Identify how construction traffic will be managed along Fernbank Creek Road and at the intersection of Fernbank Creek Road and Hastings River Drive. Are temporary signals proposed?
- Is there sufficient space on the road to accommodate two-way heavy vehicle construction traffic along Fernbank Creek Road? Is a road upgrade potentially required?
- Is there sufficient space to allow pedestrian movements along Fernbank Creek Road?
- Where will engineering fill be sourced from and will there be any traffic impacts at source or along route as a result of the importing of fill?

Air Quality

- Confirm if the intake will be covered or uncovered, and what implications covered/uncovered may have for odour dispersion.
- Confirm if an Odour Control Unit is to be installed and the reasons for this decision.
- In the event of discharge of minimally treated effluent from the storage pond during high rainfall events, what are the likely odour impacts during discharge and in the period after discharge has ceased?
- Confirm how the management of solid, liquid and gaseous waste streams with potential to generate emissions to air will be undertaken.
- Provide an estimate of the resulting ground level concentrations of all pollutants. Where necessary use an appropriate dispersion model to estimate ambient pollutant concentrations.
- Outline specifications of pollution control equipment and management protocols for point and fugitive emissions.

Waste

- The EIS outlines existing waste sources in the Port Macquarie-Hastings LGA, but none that are specifically related to the project. The existing WCA does not mention any existing operations related to proposal or any approved regional or industry waste plans. Please provide updated information as per the SEARs.

Services

- Please provide details of the services that are to be relocated as part of the proposal, and the details of any landscaping that will be provided. It is not appropriate to defer information to CEMPs