

Our ref: SSD- 56884966

Attachment A - Submissions Report Requirements

---

**Subject:** Submissions Report Requirements

The Submissions Report (SR) must address all issues raised by government agencies in their advice, all issues raised in public submissions by members of the public and interest groups, and the issues identified by the Department, outlined below.

## Statutory Context

- Clarify the statutory context to ensure that it appropriately outlines the assessment pathway for the project.
- Provide additional information detailing how the project has been designed to address relevant provisions of State Environmental Planning Policy (Sustainable Buildings) 2022, including a quantification of embodied emissions attributable to the project.

## Water

- It is noted that the hydrogeological assessment (Appendix 14 to the EIS) has been completed for construction only. Provide further information regarding:
  - o operational impacts to groundwater for the design life of the project
  - o operational impacts to the geomorphology as a result of the discharge of treated effluent for the design life of the project.
- In Appendix 8 to the EIS it is stated that half of the treated effluent is assumed to flow to the Pacific Ocean and half into the Macleay Arm. Provide support for this assumption.
- Would there be any circumstances (e.g. wet weather events) under which untreated effluent would be discharged? If so, provide details to justify these discharges.

## Flooding

- At what flood level would the project cease to operate and what is the storage capacity of the project to store untreated effluent?
- Please also provide information regarding the storage capacity in relation to electricity outages that may be experienced in the area.

## Aboriginal Cultural Heritage

- Provide further information on the proposed underboring of Razorback Ridge and why this is considered a preferred heritage outcome, (as identified in consultation with RAPs).

### Social

- Provide further information on how financial impacts to residents would be managed and monitored by Council.
- Provide information on 'hardship' payment plans or other programmes that Council has available.

### Ecologically Sustainable Development

- Provide an environmental mass balance for the project and any life cycle strategies.
- Provide information regarding how the project meets or exceeds relevant sustainability and environmental performance standards.

### Biodiversity

- Provide information on how the dunal discharge is likely to impact vegetation in the dune area (other than direct clearing) for the design life of the project, including any indirect impacts or consequences.
- In the BDAR, the Eastern Curlew is variously noted as CE, E and Not Listed under the Biodiversity Conservation Act 2016 – please clarify. Note also the inconsistency in the area of impact for this species.
- Clarify the discrepancies in impacted area for the Swift Parrot between the consideration for Serious and Irreversible Impact (SAIL) and the assessment under the Environment Protection and Biodiversity Conservation Act 1999.
- Note that the SAIL consideration of the Swift Parrot differs from the consideration the Eastern Curlew. Consider reviewing the SAIL assessment methodology for the Swift Parrot.
- Clarify the total area of indirect impacts for both terrestrial biodiversity and aquatic ecology.
- Clarify if any credits are required for the clearing of hollow bearing trees
- Provide further detail on opportunities for micro-siting of the dunal discharge components to minimise vegetation clearing.

### Traffic and Transport

- Clarify whether any intersection upgrades and subsequent clearing of vegetation have been included in assessment undertaken for the BDAR.

### Coastal Hazards

- Provide information on how the elements of the proposal that are within the Coastal Vulnerability area have been designed to withstand projected coastal hazards for the design life of the project, noting the requirements of the State Environmental Planning Policy (Resilience and Hazards) 2021

### Noise and Vibration

- Provide information on any operational noise impacts relating to elements of the project outside of the WWTP site.

### Air Quality

- Provide information on any odour impacts relating to elements of the project outside of the WWTP site.