

Our ref: OUT24/13411

Nick Hearfield
Planning Group
NSW Department of Planning, Housing and Infrastructure
Email: nick.hearfield@dpie.nsw.gov.au

9/09/2024

Subject: Thrumster Wastewater Scheme (SSI-56980459) – Environmental Impact Statement

Dear Nick,

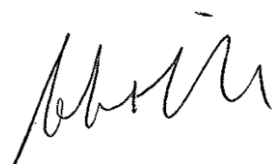
I refer to your request for advice sent on 5 August 2024 to the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group about the above matter.

Port Macquarie-Hastings Council is proposing to develop the Thrumster Wastewater Scheme which includes a new wastewater treatment plant (WWTP), associated pipelines and infrastructure to service Thrumster, Sancrox, Fernbank Creek and catchment diversions from the Port Macquarie Wastewater Scheme.

NSW DCCEEW Water Group has reviewed the Environmental Impact Statement and has recommendations regarding water supply, take and licensing, groundwater impacts and surface water impacts. Please see **Attachment A** for more detail.

Should you have any further queries in relation to this submission please do not hesitate to contact NSW DCCEEW Water Assessments water.assessments@dpie.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read "Rob Brownbill".

Rob Brownbill,
Manager, Water Assessments, Knowledge Division
NSW Department of Climate Change, Energy, the Environment and Water

Attachment A

Detailed advice to DPHI Planning & Assessment regarding the Thrumster Wastewater Scheme (SSI-56980459) – Environmental Impact Statement

1.0 Water supply, take and licensing

1.1 Recommendation – pre-determination

The proponent should quantify the maximum annual volume of water take in each water source impacted due to aquifer interference and demonstrates sufficient entitlement can be acquired in each water source prior to take occurring.

Explanation

Insufficient information has been provided to confirm the potential groundwater inflow volumes. The proponent notes there will be more than 3ML of take but provides no specific quantification. This project crosses multiple Water Sharing Plans and water sources. The proponent must quantify maximum potential water take in each impacted water source and demonstrate sufficient entitlement can be obtained in each impacted source to cover the estimated take.

1.2 Recommendation – pre-determination

The proponent should quantify maximum site water demands for the project both for construction and ongoing operation and identify adequate and reliable water sources to meet these demands.

Explanation

Insufficient information has been provided to confirm site water demands required for project construction and operation. The proponent must quantify demands and identify sufficient and reliable water sources to meet these demands. As per recommendation 1.1, should these be from licensable sources, the proponent should demonstrate entitlement can be obtained, or whether an exemption applies.

2.0 Groundwater impacts

2.1 Recommendation – post approval

The proponent should undertake further assessment of groundwater impacts for all elements of the project against the NSW Aquifer Interference Policy (AIP) (2012). This should be documented in the final design stage report and submit to NSW DCCEEW Water Group for review.

Explanation

The project has assessed take and impacts at the stormwater pond during construction only, however the take and impacts for other project activities are undocumented. Pipe alignments are planned through a Groundwater Dependent Ecosystem (GDE) wetland. While

it is anticipated that this should not have more than minimal impact to adjacent GDEs or sensitive environments, there is a requirement to confirm the potential level of impact. Further assessments need to be completed during the final design stage of the project.

The EIS is a preliminary assessment of the proposed project and does not include a full assessment of the pipeline groundwater take and or detailed design for all segments of the pipeline alignment. Further assessment is acknowledged as being required by the proponent and NSW DCCEEW Water Group agree. Further groundwater studies assessment and evidence must be reported in a final design document and supplied to the department for review prior to final construction approval.

2.2 Recommendation – post approval

The proponent should compose and submit to NSW DCCEEW Water Group for review a finalised dewatering management plan (DMP) that covers all elements of the project which are indicated to encounter groundwater. The DMP must include:

- a. Monitoring, recording, and reporting of the inflow volume of groundwater
- b. Water quality monitoring programme which includes measurement, recording, and reporting of field parameters such as but not limited to:
 - o Turbidity, electrical conductivity, pH, total suspended solids, total dissolved solids and oil or drilling fluid contamination
- c. Monitoring programme to measure, record and report groundwater level drawdown impact upon local GDE's where the project component is located within proximity to any indicated GDE's.

Explanation

To assess all aspects of the project which encounter groundwater a finalised dewatering management plan will need to be developed and submitted to the NSW DCCEEW Water Group for assessment. Including groundwater take, quality and level of impact upon SEPP 14 wetland GDEs.

2.3 Recommendation – post approval

The proponent should develop an acid sulphate soil and water management sub-plan to be included in the construction environmental management plan.

Explanation

NSW DCCEEW Water Group concur with the proponent that an acid sulphate soil (and water) management plan (ASSMP) is required for all areas that are indicated to be potential acid sulphate bearing. The ASSMP must include handling and treatment of any acidic groundwater and should be included as a sub-plan to the construction environmental management plan.

3.0 Surface water impacts

3.1 Recommendation – post approval

The proponent should identify specific mitigation measures, such as rehabilitation of disturbed sites in and adjacent to waterways and remediation of potential acid sulphate soils, in the Construction Environmental Management Plan and Erosion and Sediment Control Plan.

Explanation

Table 8.3 of the mitigation section of the Water Resources and Flooding Assessment outlines a general approach to addressing geomorphic impacts to watercourses on the site. These measures include mitigation of saturated Potential Acid Sulphate Soils (PASS), highly dispersible soils and limiting areas of disturbance and exposed soil stockpiles.

The mitigation report recommends adherence to control measures outlined in the Blue Book for construction activities and mitigation of treated wastewater release into Kooloonbung Ck and Partridge Ck. These measures appear consistent with NSW DCCEE Water Group's mitigation requirements for excavation and trenching of waterways. Specific mitigation measures, such as rehabilitation of disturbed sites in and adjacent to waterways and remediation of PASS soils should be identified in the Construction Environmental Management Plan and Erosion and Sediment Control Plan for the proposed wastewater treatment plant.

3.2 Recommendation – post approval

To identify and remediate impacts and erosion, the proponent should prepare an Operational Environmental Management Plan that includes monitoring of crossing points and any associated disturbance to waterways, and PASS that are encountered during pipeline installation.

Explanation

Post-construction inspections and monitoring program is recommended to identify and remediate impacts to fringing vegetation and exposure and erosion of soils within or downstream of stream crossings. An Operational Environmental Management Plan should be required to include operational monitoring of crossing points and any associated disturbance to waterways and dispersible soils and PASS soils that are encountered during pipeline installation for the proposed wastewater treatment facility.

4.0 Controlled activities on waterfront land

4.1 Recommendation – post approval

The proponent should ensure works within waterfront land are designed and constructed in accordance with the Guidelines for Controlled Activities on Waterfront Land.

Explanation

To protect riparian environments, all works within waterfront land must be designed and constructed in accordance with the Guidelines for Controlled Activities on Waterfront Land.

This includes outlet design, launch & retrieval sites being setback from top of bank and pipeline designs.

The guidelines can be found here: <https://water.dpie.nsw.gov.au/our-work/licensing-and-trade/controlled-activity-approvals/guidelines>

4.2 Recommendation – post approval

An Erosion and Sediment Control Plan should be developed in accordance with industry standards including the guideline, Managing Urban Stormwater: Soils and Construction (Landcom 2004).

End Attachment A