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Our Ref: HW2018-3

Mr Scott Hay
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Via email: scott.hay@planning.nsw.gov.au

Dear Scott,

**REQUEST FOR SEARS FOR A NEW CATHOLIC COLLEGE – 2 KINGFISHER CLOSE,
MEDOWIE – SSD 8989**

Thank you for your request to Hunter Water dated 15 December 2017 to provide input to the Secretary's Environmental Impact Assessment Requirements (SEARS) for the proposed Catholic College to be located at Lot 412 and Lot 413 DP 1063902 at 2 Kingfisher Close and 507 Medowie Road, Medowie. Hunter Water understands that the site is approximately 27 hectares in size, and that the development would include demolition of existing structures at the site and construction of a primary school, a high school, a place of worship, residential duplex and child care centre, together with associated infrastructure such as car parks, retaining walls and landscaping. It is noted that the construction works are expected to be undertaken over a period of ten years, and will include some clearing of vegetation. Hunter Water offers the following information for input on the SEARS for this proposal.

Water Quality

The proposed development falls within Hunter Water's Grahamstown Dam Drinking Water Special Area as gazetted in the *Hunter Water Regulation 2015*. Grahamstown Dam supplies approximately 40% of drinking water to the Lower Hunter. Hunter Water maintains a multiple barrier approach to ensuring safe drinking water in accordance with the Australian Drinking Water Guidelines (ADWG), which are the national framework for good management of drinking water supplies. The first fundamental principle of the ADWG states that: "...*Protection of source waters and treatment are of paramount importance and must never be compromised.*" Prevention of pollution or contamination of water in the drinking water catchments is of paramount importance to Hunter Water.

Hunter Water requires all development within drinking water catchments to demonstrate a Neutral or Beneficial Effect on Water Quality (NorBE). The primary ways in which the proposed development could adversely affect water quality are through demolition and construction activities, which can release sediment to water bodies, and through sewage and stormwater discharge during the occupation phase, which can introduce sediment, pollutants and pathogens into water bodies. Chemical use and storage on site could also be a source of pollutants for this development.

A development is considered to demonstrate NorBE if the development:

- (a) has no identifiable potential impact on water quality, or
- (b) will contain any water quality impact on the development site and prevent it from reaching any watercourse, waterbody or drainage depression on the site, or
- (c) will transfer any water quality impact outside the site where it is treated and disposed of to standards approved by the consent authority.

Further details are provided in Hunter Water's "*Protecting our Drinking Water Catchments: Guidelines for developments in the drinking water catchments*", a copy of which is available on Hunter Water's web site at <https://www.hunterwater.com.au/Building-and-Development/Land-and-Property-Development/Development-in-a-Drinking-Water-Catchment.aspx>. The guidelines were prepared in consultation with the Department of Planning and Environment, local councils and NSW Health.

The Sediment, Erosion and Dust Controls section of the draft SEARs are considered to sufficiently cover erosion and sediment control issues.

Connection of the development to the reticulated sewer network is considered to meet NorBE for wastewater. In response to an application for a Section 50 Compliance Certificate by the the Trustees of the Roman Catholic Church for the Diocese of Maitland, Hunter Water advised that a developer-funded sewer servicing strategy will be required for the development as the existing network has limited capacity to accommodate the additional load.

In terms of stormwater management, the Drainage section of the draft SEARs indicates the environmental assessment should "*Detail measures to minimise operational water quality impacts on surface waters and groundwater*". Given that the development is proposed to be located within a drinking water catchment, Hunter Water requests that the SEARs specifically address the need for the development to demonstrate NorBE in terms of stormwater runoff, and that the proponent undertake MUSIC modelling using the appropriate Port Stephens Council MUSIC Link catchment and default parameters.

A comparison between existing and expected post-development pollutant loads in stormwater runoff should be made to demonstrate that the proposed stormwater infrastructure and treatment train will satisfactorily address water quality concerns for the typical stormwater pollutants of total nitrogen, total phosphorus, total suspended solids and gross pollutants. The modelling files should be provided to the Department to disseminate to Council and Hunter Water for review, together with the MUSIC Link outputs. Justification should be provided for the parameters used in the modelling, including the catchment type selected and any variations to the default parameters, as well as a clear description of the proposed treatment train and assumptions made in preparing the modelling files. Please note that Hunter Water may seek an independent review of this modelling.

Given the nature of the development, risks to water quality are also posed by the use of fertilisers and pesticides within the grounds and chemical storage. Hunter Water requests that the SEARs include a requirement for the proponent to describe the processes for managing these potential pollutant sources.

Further, it is noted that the Contamination section of the draft SEARs indicate that a contamination assessment must be undertaken to identify soil or groundwater contamination at the site. It should be stressed that, if contamination is found, contaminants must not be permitted to leave the site through soil or surface water runoff.

If you require further advice or clarification regarding the submission, or questions regarding the application of NorBE, please contact me on (02) 4979 9545.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'M. Withers', written in a cursive style.

Malcolm Withers
Account Manager Major Development