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13<sup>th</sup> May 2025

To Nick Hearfield,  
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**Subject: Concerns Over Omission of Information, Misleading Conduct, and Consultation Failures in the Thrumster WWTP Project**

I write to raise serious concerns regarding the Thrumster Wastewater Treatment Plant (WWTP) project, particularly around the omission of critical documents, exclusion of stakeholders, misleading communications, and procedural failings involving the Council and its consultant, GHD. I am dissatisfied with the response from council made on 9/5/25.

**1. Absence of Key Documents and Deliberate Misleading Information**

Crucial documents outlining infrastructure planning and site comparisons were excluded from the Environmental Impact Statement (EIS), Response to Submissions (RTS), and Amendment Report (AR), despite being available to Council and GHD. These documents clearly show the proposed site is significantly less suitable—financially, environmentally, culturally, and socially—than alternatives such as Lake Road and Koala Street.

The chosen location is flood-prone, ecologically sensitive, and of cultural significance, as confirmed by artefacts found during excavations. Meanwhile, upgrading existing infrastructure at Koala St, an option supported by the EPA, offers numerous advantages, including:

- Improved water quality and reduced odour,
- Lower cultural and ecological impact,
- Avoidance of major sewer diversions,
- Significantly lower capital and operational costs.

Key Documents Omitted:

- Thrumster Wastewater Scheme – Strategic Wastewater Management Plan (Beca HunterH2O, 2023)
- Discharge Options Assessment (Beca HunterH2O, Feb 2024)
- Connection Investigation Response - *Thrumster Sewer Scheme V3* (April 2025)
- Feedback from Birpai Traditional Owners Corporation

**2. Stakeholder Exclusion**

Directly impacted Fernbank Creek residents were not included in consultation or decision making, while select groups such as the Hastings Birdwatchers participated in the Multi Criteria Analysis (MCA). Nearby residents were directly excluded and denied a fair opportunity to raise concerns.

**3. Misleading Public Communications**

As of 10 May 2025, the Council's website continues to misrepresent the project. The exhibition period was not publicly promoted, keeping the community uninformed. Rising

project costs—due to escalating construction and network expenses—were also not disclosed, further masking the flaws of the selected site in addition to exclusions associated

with the construction of access road, power upgrades associated with overhead power supply to the site, Water supply to the site, Council's contingency, NPV for the project, ongoing O&M especially power cost estimate for unfeasible and unsustainable transfer of sewer to the fernbank Creek to transfer the treated effluent back to the Kooloonbung creek. The location name is misleading in itself! The proposed site is in Fernbank Creek NOT Thrumster.

4. Exclusion of Birpai RAP from Archaeological Work

On 20 November 2024, a registered Birpai Traditional indigenous Owner was denied access to test excavations site by GHD's subcontractor, despite earlier participation and the site being on Birpai country. The Bunyah Aboriginal Council (from outside the area) was included instead. The RAP's concerns were ignored, and none of these issues—including artefact findings and formal complaints—were missing in the report by GHD and its consultant. Why was the RAP excluded? Why are his concerns and cultural values disregarded? Why were the findings of artefacts downplayed despite their potential significance?

5. Withheld Power Supply Changes

On 4 April 2025, Council received notice from Essential Energy that the original power supply route was unviable, requiring overhead cabling and footprint / impact changes. This major revision was omitted from official reports, seemingly to secure project approval without scrutiny—violating planning obligations.

6. Noise/vibration during construction

The limitations surrounding noise and nightworks have been unclear and possibly deceptive. According to the construction work hours appendix, noise and vibration may be permitted on up to four nights within any seven-day period.

Project element	Summary of the project
Construction work hours	<div><div></div><div><ul style="list-style-type: none"><li>Monday to Friday: 7:00 am to 6:00 pm</li><li>Saturday: 8:00 am to 1:00 pm</li><li>No work on Sundays or public holiday</li></ul></div></div>

ref NV4: “No more than two consecutive nights of noise with special audible characteristics and/or vibration generating work may be undertaken in the same NCA over any 7-day period, unless otherwise approved by the relevant authority.”

7. Potential contamination of drinking water

All residents of Fernbank Creek Road rely on roof-collected rainwater as our primary source of drinking water. I understand there are plans to use fill from the cowarra water treatment and its associated network project which contains **naturally occurring asbestos and other contaminations with forever materials (PFAS, etc.)**. This is especially concerning of long-term health impacts to my family (which includes 3 young children), and other nearby residents and workers.

8. Environmental concerns

The biodiversity report outlines the Swift Parrot, Koala, Trailing Woodruff, Leafless Tongue Orchid, Slender Marsdenia and Biconvex Paperbark impacted by the project as a “matter of national environmental significance”. This raises legitimate concerns about the suitability of the proposed location. To date, these environmental impacts have not been adequately addressed by the project.

At the proposed project site, my family and I witnessed the bush and peat fires that burned for 210 days during the 2019-2020 fire season, followed by a historic major flooding event in 2021. This raises two significant concerns:

1. The proposed area is environmentally vulnerable and prone to extreme events, which could place any new infrastructure at substantial risk.

2. The proposed elevated site has the potential to exacerbate flood risks, including spillage and overflow, in the event of a wet weather event. Current flood modelling does not include modelling based on allow for extra clogging and silting of the creeks due to discharge of the stormwater from the plants and road's embankment and solid surfaces to the creeks .

#### Conclusion and Requests for Action

This pattern of withheld information, stakeholder exclusion, and misleading practices undermines public trust and legislative compliance.

I respectfully request:

1. An immediate review of the EIS, RTS, and Amendment Report for accuracy and completeness.
2. Suspension of all approvals pending a full, independent reassessment including all previously omitted reports.
3. Re-engagement with all affected stakeholders, including Birpai Traditional Owners and Fernbank Creek residents.
4. Public release of all withheld documents and revised cost estimates.

The project's environmental, cultural, and financial impacts must be transparently reassessed before further progression.

Sincerely,

Dr Lisa An