

# **Formal Response to Council Submission Regarding the Proposed Wastewater Treatment Plant**

**Submitted by: Dr Charles Hopley, Resident – Fernbank Creek Road**

I am writing in response to Council's recent submission concerning the proposed wastewater treatment plant and associated infrastructure. As a long-term resident of Fernbank Creek Road, I must express my strong objection to this proposal. The project, as currently presented, appears to be poorly conceived, inadequately investigated, and poses a significant and unacceptable risk to both residents and the environment. The following outlines the many issues at play:

## **1. Omission of Key Documents and Misrepresentation of Facts**

Crucial documents evaluating the viability of the Thrumster WWTP site were deliberately omitted from the Environmental Impact Statement (EIS), its appendices, and subsequent reports. These documents contained findings that demonstrated the selected site's clear inferiority—environmentally, socially and economically—when compared to alternatives such as Lake Road and Koala Street.

Despite this, the Council and GHD excluded the following key reports from public and departmental scrutiny:

Thrumster Wastewater Scheme – Strategic Wastewater Management Plan (Beca HunterH2O, 2023d)

Discharge Options Assessment (Beca HunterH2O, February 2024)

Connection Investigation Response – ECN-022950\_MNC000088 – Thrumster Sewer Scheme V3 (April 2025)

These documents concluded that the selected site is suboptimal due to:

Flood-prone location and associated environmental risks

Long-term ecological degradation

Negative social impacts and public health concerns

Conversely, a progressive upgrade of the existing infrastructure—an option previously supported by the EPA—would:

Improve receiving water quality

Reduce odour and air pollution

Limit ecological impacts

Require less land disturbance and offsetting

Eliminate major diversions and lower project costs

The intentional exclusion of these findings from the EIS, Response to Submissions (RTS), and Amendment Report (AR) is both misleading and deceptive, undermining the integrity of the planning process and depriving decision-makers of the full evidence base.

## **2. Misleading Public Communication and Withheld Cost Information**

As of 10 May 2025, the Council's official website continues to present incomplete and misleading information. The public exhibition period was not properly promoted, denying affected residents an opportunity to engage.

Moreover, substantial cost escalations relating to the construction and delivery of the Thrumster WWTP were not publicly disclosed. This intentional withholding of updated financial information

reflects a pattern of opacity designed to avoid scrutiny and reinforces the project's unaffordability relative to superior alternatives.

Despite these objections, no reference to the incident or its implications was made in the EIS, RTS, or AR. This exclusion appears retaliatory and reflects a broader lack of impartiality and cultural sensitivity in the management of heritage processes.

### **3. Withholding of Critical Power Supply Information**

On 4 April 2025, the Council received an updated connection investigation from Essential Energy which revealed that the originally proposed underground conduit route was unfeasible. This required significant changes, including overhead power lines and a revised route—alterations that impact both the project's footprint and environmental assessment.

This information was deliberately withheld from the AR and RTS and appears to have been reserved for later modification requests—contravening the principles of transparent and accurate environmental assessment.

### **4. Other Infrastructure Requirements**

The success and safety of this project depend on two non-negotiable elements of local infrastructure:

1. **Fernbank Creek Road must be significantly upgraded**—widened, fully resurfaced, cleared of hazards, and fitted with appropriate lighting and signage. It is currently dangerous, narrow, and deteriorating, and cannot support the heavy industrial traffic this plant would bring.
2. **Dredging and restoration of Fernbank Creek, Partridge Creek, and Kooloonbung Creek** must be carried out as a prerequisite to any construction. These creeks are choked with debris and no longer function as effective waterways. Before any plant is approved, they must be reconnected to the larger Hastings River system to ensure flood mitigation and drainage capacity.

### **5. Health Hazards – Contaminated Materials and Drinking Water Risks**

Residents of Fernbank Creek rely entirely on rooftop-harvested tank water. Any airborne pollutants generated by construction activities or the plant's operation will settle on roofs, ultimately contaminating our only source of drinking water.

In contrast, Koala Street residents receive piped, underground water, protected from such risks.

### **6. Questionable Process and Rushed Planning**

Why is Council rushing to build a facility on swampy, unstable land—ignoring more suitable industrial areas that already have the necessary infrastructure?

It appears that a sensible alternative—modernising and expanding the existing Koala Street–Lake Road treatment plant—was prematurely dismissed. That site is already zoned partly industrial, poses far less ecological risk, and with planned upgrades, could meet the required capacity at a significantly lower cost. It offers a far more efficient and environmentally responsible solution.

The Environmental Defence Organisation has pointed out that the Environmental Impact Statement (EIS) should have included a thorough discussion of alternative sites and options. In fact, the Secretary's Environmental Assessment Requirements (SEARs) specifically mandate that proponents must evaluate alternative options and explain the analysis behind their final decision in the EIS.

Yet, it appears serious consideration was not given to this viable alternative, which could both serve the growing needs of Thrumster and modernise the aging Koala Street–Lake Road facilities. No public explanation—technical, scientific, ecological, health-based, or economic—has been provided as to why this alternative was dismissed. Instead the Council is proceeding with a high-impact development on an environmentally sensitive and inappropriate site in Fernbank Creek, without the transparency and accountability the community deserves.

## 7. COST vs. BUDGET – A Financial Disaster in the Making

The **Estimated Development Cost (EDC)**—previously known as the Capital Investment Value (CIV)—for the proposed wastewater treatment plant is \$134 million **excluding** GST, contingencies, and escalation costs.

However, in a Council document dated July 2023, the **actual projected cost** is stated as **over \$200 million, plus environmental costs\*** and **plus power infrastructure upgrades**. These figures do not include further land acquisition, road upgrades, or emergency mitigation works.

*\*Environmental costs: Dredging Fernbank Creek and potentially Partridge Creek, and reopening them to the Hastings River, is an expensive and complex undertaking.*

*\*Power infrastructure costs: Upgrading electrical supply requires bush clearing, access road construction, fire safety compliance, and long-term annual maintenance.*

**Both of these are unavoidable, basic infrastructure requirements.** They are not optional extras, and their omission from the cost analysis suggests either negligence or even intentional concealment.

## Conclusion

The flood-prone, swampy location selected for the wastewater plant poses significant risks of operational failure, environmental harm, and community backlash. Without transparent justification of site selection, robust flood-proofing, ecological protections, and proper consideration of local infrastructure and public health, this project cannot proceed responsibly and approving this plan as is would be financially reckless. Council has a duty to plan for the future with care, transparency, and respect for the community it serves. In its current form, this proposal represents a preventable disaster and must be immediately suspended and ultimately cancelled at the proposed Fernbank Creek location.

**Sincerely Yours,**

**Dr Charles Hopley**

**Fernbank Creek Rd Resident**