

Formal Response to Council Submission Regarding the Proposed Wastewater Treatment Plant

Submitted by: Jennifer Berger, Resident – Fernbank Creek Road

As a resident of Fernbank Creek Road, I am compelled to voice my firm opposition to the proposed wastewater treatment plant. After reviewing the submission, I find the project to be poorly planned, inadequately justified, and a serious threat to our community's environment and wellbeing. Below, I outline the key concerns that demand reconsideration of this proposal:

- **Lack of Transparency in Site Selection and Documentation**

The Environmental Impact Statement (EIS) and related reports, including the Response to Submissions (RTS) and Amendment Report (AR), fail to include critical documents that question the suitability of the Thrumster site. Reports such as the *Thrumster Wastewater Scheme – Strategic Wastewater Management Plan* (Beca HunterH2O, 2023d) and *Discharge Options Assessment* (Beca HunterH2O, February 2024) highlight the site's environmental, social, and economic shortcomings compared to alternatives like Koala Street or Lake Road. These omissions suggest an intentional effort to obscure evidence that the Thrumster site is flood-prone, ecologically damaging, and costlier than upgrading existing facilities. A transparent process would have prioritised these findings and explored less harmful options.

- **Inadequate Public Engagement and Cost Disclosure**

The Council's communication about the project has been insufficient, with minimal effort to inform residents during the public exhibition period. As of 10 May 2025, the project website provides outdated and incomplete information. Furthermore, significant cost increases—escalating well beyond the initial \$134 million estimate—have not been shared publicly. This lack of openness undermines trust and raises questions about the project's affordability and the Council's commitment to accountability.

- **Undisclosed Changes to Power Infrastructure**

Essential Energy's April 2025 report revealed that the planned underground power conduit for the plant is unfeasible, necessitating overhead lines and a new route. These changes, which expand the project's environmental footprint, were excluded from the AR and RTS. Withholding such critical updates violates the principles of honest environmental assessment and suggests an intent to defer scrutiny until after approval.

- **Insufficient Infrastructure Planning**

The project's success hinges on major upgrades to local infrastructure, which have not been adequately addressed.

- **Fernbank Creek Road:** This narrow, deteriorating road is unfit for heavy industrial traffic. It requires widening, resurfacing, hazard clearance, and proper lighting to ensure safety.

- **Creek Restoration:** Fernbank, Partridge, and Kooloonbung Creeks are clogged and disconnected from the Hastings River. Dredging and restoration are essential to prevent flooding and ensure drainage, yet no clear plan or budget for this work has been provided. Without these prerequisites, the project risks operational failure and environmental harm.
- **Public Health Risks**
Residents along Fernbank Creek depend on rainwater tanks for drinking water. Construction dust and plant emissions could contaminate these tanks, posing a direct health risk. In contrast, Koala Street residents have access to protected, piped water, making that site a safer alternative. The Council's failure to address this disparity is deeply concerning.
- **Dismissal of Viable Alternatives**
The decision to build on a flood-prone, ecologically sensitive site ignores more suitable options, such as expanding the existing Koala Street–Lake Road facility. This alternative is already zoned for industrial use, requires less environmental disruption, and could meet capacity needs at a lower cost. The EIS does not provide a credible explanation for dismissing this option, despite the Secretary's Environmental Assessment Requirements mandating a thorough evaluation of alternatives. This oversight suggests a rushed and biased planning process.
- **Financial Mismanagement**
The project's estimated cost of \$134 million excludes critical expenses, including environmental restoration, power infrastructure upgrades, road improvements, and land acquisition. Internal Council documents from July 2023 indicate costs exceeding \$200 million, with additional unbudgeted expenses for creek dredging and electrical upgrades. These omissions point to either poor planning or deliberate misrepresentation, risking a financial burden on the community.

Conclusion

The proposed Thrumster wastewater treatment plant is a flawed and risky endeavour. Its flood-prone location, environmental impacts, and inadequate infrastructure planning threaten our community's health, safety, and finances. The Council's lack of transparency, dismissal of alternatives, and failure to address critical concerns undermine public trust. I urge the Council to halt this project, thoroughly reassess viable alternatives, and prioritise the wellbeing of Fernbank Creek residents and the environment.

Sincerely,
Jennifer Berger
Fernbank Creek Road Resident