



## Community Environment Network Inc.

*An alliance of community and environment groups from Lake Macquarie, Wyong and Gosford.*

Department of Planning  
Major Projects  
Sydney 2000

11<sup>th</sup> November 2011

### **Re: Brooklyn and Dangar Island Sewerage Scheme – Modification to Condition 63.**

Dear Sir,

The Community Environment Network objects to the request by Sydney Water to Modify Condition 63 of the prior approval of the Brooklyn Dangar Sewerage Scheme.

In particular, CEN believes that this project should not be considered until more detail is provided by Sydney Water. This has been requested by locals in Brooklyn and on Dangar Island. Specifically, information has not been provided to the public to explain the poor performance and high cost of the plant. Locals have requested that SWC provide current information on the operational failures, including;

1. Chemical usage of ferric chloride is 4 times above other plants and is substantially over design;
2. Electricity consumption is between 50 to 60% above design specifications, and;
3. Membranes which are a key element of the cost are failing after only 3 years of life versus Sydney Waters design expectation of ten years.

Prior to the plant being built, water plant experts estimated a life of 5 to 7 years for membranes across the life of the plant. This is with a plant running at 100% but the plant has only operated at 30% capacity since it was built. The plant was designed with high standards to minimize pollution into the Hawkesbury as a compromise to discharging the effluent through Sydney or into the Ocean.

The best solution is to maintain the high quality of effluent discharge by fixing the problems in the plant operation. CEN believes that Sydney Water should provide information on the failure of the plant and identify all steps taken to fix the plant and alternatives considered. CEN calls on Department of Planning to 'Stop the Clock' on this proposal until all the information requested from Sydney Water by locals has been provided and all options to improve operation of the plant considered.

**Comment 1:** Do not approve any variation in Condition 63, instead fix the Sewerage Treatment Plant.

Locals in Gosford LGA were required to contribute an amount of approximately \$17,000 to the capital cost of the STP. These residents have been given no detail in regard to the failures of the plant to perform and they are entitled to an explanation.

**Comment 2:** Further consideration of the project should stop until locals are given an explanation of the STP failures.

The Healthy Rivers Commission Report in 1997 was the beginning of improving the environmental health of the river. Cabinet endorsed the recommendations of the HRC report and in 1998 adopted the Statement of Joint Intent whereby all arms of government were committed to improving the health of the river. In July 2010 following significant engineering works, studies and consultation, environmental flow releases commenced from the Metropolitan Dams into the Hawkesbury Nepean System.

**Comment 3:** Do not approve the request due to the devaluing of environmental flows

The government policy position to achieve environmental improvements to the health of the river system has been substantial and long term. This includes Regional Environment Plans, Catchment Action Plans and Management Plans.

**Comment 4:** Do not allow any increase in pollutants entering the river as it is counter to good policy

NSW Government has been conducting a voluntary buy back of water licences in order to release more environmental water into the HN System. This was advertised in June 2011 and is the Water Licence Purchase Project and it is an integral part of the overall Commonwealth-funded Hawkesbury-Nepean River Recovery Program. The project is managed by the Office of Environment and Heritage. Increasing the level of pollution at Brooklyn negates the effect of increasing environmental flows.

**Comment 5:** Do not approve this application as it is contrary to a *Whole of Government Approach*.

Increased pollutants entering the river will add to the pollutant load carried by the river from existing development and discharges within the catchment. Increased outbreaks of algal blooms are likely.

**Comment 6:** Do not approve any increase in discharges as it will unnecessarily increase biological load on the river.

Engineering works on dams and weirs and catchment works by agencies, communities and councils have all aimed to improve the health of the river. Substantial expenditure of public funds through utilities, Catchment Management Authorities and councils needs to be added to the work and private funds of oyster growers, fishermen and communities.

**Comment 7:** Do not allow any increase in pollutants as it negates much public expenditure to date.

Sydney Water has not addressed the operational failures that have been identified in the Brooklyn plant but instead sought an increase in the pollution license discharge limits. If this is approved it could become a precedent for all chemical plants in NSW that suffer from poor operational performance.

**Comment 8:** Do not allow this proposal to succeed as it sets a bad precedent

The Land and Property Management Authority is currently engaged in a process to determine the future usage of the former Peats Island Hospital lands in Mooney and Peats Island. Part of these proposals is for increased residential and commercial development. Consequently, additional sewerage load will occur into the Sewerage Treatment Plant (STP) and associated discharges will increase.

**Comment 9:** Do not allow the effluent quality to decrease as volumetric discharges are likely to increase.

The justification for the increase in discharges is noted to have been subject to an economic evaluation. However, the methodology used is not valid as economic evaluations usually consider alternative approaches to achieve similar outcomes. In this instance the outcomes are markedly different. A more appropriate alternative strategy for the economic evaluation would be to consider the cost of purchasing such water or releasing more water from dams on the Hawkesbury Nepean to dilute and transport the increased effluent stream while maintain the existing standards. The cost of this water is known and such an option gives identical outcomes. For example, Sydney Water charges \$1.296/kL for trade waste and the plant is designed for a maximum flow of 2.2. ML/Day. In addition, according to the OEH website water is trading for around \$1,000/ ML from Cattai Creek.

**Comment 10:** Economically evaluate the option presented against other options to achieve identical not differing outcomes.

In conclusion, fishermen are reporting seeing dolphins in the river after 20+ years of work by communities, agencies, fishermen and councils to clean up the river. This proposal now attempts to turn back the clock by increasing pollution and undoing many years of good government policy and substantial expenditure rather than fixing the Sewerage Plant.

Yours sincerely



Chairman