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Tim Macdonald:tm
11 November 2011

Gosford City Council

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Lisa Chan
A/Senior Planner
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NSW Department of Planning & Infrastructure
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Dear Ms Chan,

Exhibition of Modification Request for Brooklyn and Dangar Island Sewerage Scheme - MP 09_0134 MOD 03

I write to express Gosford City Council's concern in regard to Sydney Water's proposal to increase nutrient discharge limits from the Brooklyn Wastewater Treatment Plant (BWTP) into the Hawkesbury River.

Nutrients in the estuary increase the risk of harmful algal blooms becoming more prevalent which in turn threatens public health, local fisheries, oyster industries and recreational activities. This risk to estuarine health, commercial and recreational pursuits is unacceptable.

The recent information released by Sydney Water has highlighted that the BWTP is not operating to original design specifications. The plant operational problems are clearly evident with:

- Chemical usage of ferric chloride 4 times above other plants and is substantially over design;
- Electricity consumption is between 50 to 60% above design specifications, and;
- 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.

In 1998 the Healthy Rivers Commission Report 'Independent Inquiry into the Hawkesbury Nepean River System' highlighted a range of significant and frequently long-term issues which have not been well managed and which present serious risks to the health and welfare of the Hawkesbury River system.

The Inquiry specifically focused upon minimizing the impact of Sewage Treatment Plants upon estuarine health including SE4 (p178) which related to decision criteria for new Sewage Treatment Plants. It recommended that where existing developed areas warrant sewage treatment by a new sewage treatment plant, the decision criteria should include public health risk and risks to sensitive receiving environments as well as population density and cost. Additionally the Inquiry stated that license conditions on new plants should not allow desirable ambient water quality in receiving waters to be significantly compromised.

In line with this recommendation the BWTP was designed with high treatment standards to minimize pollution as a compromise to discharging the effluent into the Hawkesbury River. The Minister for Planning granted approval for the sewerage scheme on 20 March 2006 with the Conditions of Approval (CoA) that included CoA 63, placing limits on the quality of effluent discharged from Brooklyn WWTP that came into effect on 23 July 2011.

It is also Council's understanding that the proposal to alter nutrient discharge concentrations has not been evaluated in accordance with requirements of the Healthy Rivers Commission Report which concludes "For future protection of river health, the commission recommends that all license renewal processes should incorporate assessment of the cumulative impacts of discharges within the relevant sub-catchment. Those assessments should be in terms of the implications of the subject activities for river health outcomes" (p71).

Further, the proposal to increase nutrient discharge concentrations from BWTP is inconsistent with NSW State Government natural resource management objectives which seek to improve estuarine health through nutrient reduction programs and acknowledges that the plant has failed to perform to design specifications. This design failure should be resolved with an engineering solution to improve effluent quality rather than by degrading the estuary by increasing nutrient discharge concentrations.

Government agencies, Local Government, industry and community groups are working cooperatively to remove nutrients from the estuary. In particular, the proposal is inconsistent with the Office of Environment and Heritage (2010) "Lower Hawkesbury Nepean Nutrient Management Strategy" which has the objective to "reduce nutrient loads from existing sources" (p1).

It is Council's position that the sewerage discharge pollution limits for BWTP not be increased. Sydney Water should improve plant performance by installing additional or alternate treatment measures to improve the discharge quality that doesn't require increasing nutrients into the estuary or cost to residents.

Should Sydney Waters application for a modification to the effluent quality limits in CoA 63 be approved, Council requests that an enhanced water quality monitoring program be established so that the impacts of the BWTP can be assessed as its capacity increases to ensure that discharges are not detrimental to the receiving environment.

Please contact me on (02) 4304 7658 should you have any queries.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Colleen Worthy-Jennings', written in a cursive style.

Colleen Worthy-Jennings
Director Environment & Planning