
From: David Bennett
Sent: 1/11/2021 5:51:56 PM
To: Council Northernbeaches Mailbox
Subject: DA2021/1533

Dear Council,

The application is accompanied by an 'On-site Wastewater Management Report' (SEEC 18000327 P02-WW-02) that does not comply with the following legislative requirements of the Local Government (General) Regulation (2005):

- *Section 26 'Site Assessment'*

'The Regulation requires an application for approval to install or construct a sewage management facility be accompanied by "details of the climate, geology, hydrogeology, topography, soil composition and vegetation of any related effluent application areas together with an assessment of the site in the light of those details." (Section 26(4)). This is commonly achieved when the application is accompanied by hydrologic modelling (i.e. 'water balance'). A simple 'water balance' methodology is available within the 'Environment & Health Protection Guidelines - On-Site Sewage Management for Single Households' ('The Guidelines') issued by the Director-General that can be used to demonstrate compliance with Section 26 (4). NOTE: 3.1 of the Report (Climate) is false. Evaporation does not exceed rainfall for most or all of the year. Bureau of Meteorology data suggests that rainfall exceeds evaporation greater than 50 days each year and this exceedence is on occasions significant.

- *Section 29 'Environment and Health Protection Matters' – 're-use of nutrients'*

'The Regulation' requires Council take into consideration the matters specified including "the re-use of resources (including nutrients, organic matter and water" (Section 29(2)(g)). This is commonly achieved when the application is accompanied by nutrient modelling (i.e. 'nutrient balance'). A simple 'nutrient balance' methodology is available within 'The Guidelines' issued by the Director-General that can be used to demonstrate compliance with Section 29 (2) (g).

Non-compliance with the above sections poses a significant environmental risk. Treated wastewater (or effluent') is responsible for the pollution of our waterways, damage to native ecosystems and the degradation of our soil and land.

I request the application be accompanied by an amended 'On-site Wastewater Management Report' including hydrologic modelling and nutrient modelling. A simple methodology is available within 'The Guidelines' issued by the Director-General that can be used to demonstrate compliance with Section 26 and Section 29 . Note: The methodology in the current 'On-site Wastewater Management Report' is not a water balance. Instead, the methodology Q/DLR is a simple fluid dynamics equation to explain the movement of fluid through a medium and while the methodology reference is correct (AS1547) the climate / nutrient requirements prescribed in the Local

Government Regulation remain.

I kindly request an email response. Please email me if you have any questions

Dave

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