

Rep 21

7/5/23

Greg Ingham
General Manager
Glamorgan Spring Bay Council
Via email: planning@fraycinet.tas.gov.au

Dear Mr Ingham,

Representation SA2022/046 – 155 Rheban Road, Orford

I wish to express my concern over the proposed rezoning and subdivision at 155 Rheban Rd, Orford.

This proposal is ill conceived, and if approved has the potential to jeopardise existing infrastructure and negatively impact amenity in the area for existing users.

Reading through the proposal, and placing it in a broader local context, an already stretched water and sewage system will be pushed to a point where service failures will impact existing residences, and those lots elsewhere within Orford which are already approved and ready for development.

Spring Bay Seafoods was driven from the area due to continued sewage spills rendering marine aquaculture of bivalves in the area untenable. Recent lagoon overtopping events have spilt sewage into waterways and ultimately Prosser Bay, and are a risk to public health. Adding additional loads to this system, especially under a climate change scenario where rainfall is likely to come in more intense bursts, will cause significant problems.

Taswater documentation and strategy (attached) indicates existing non-compliances, overtopping, and only a long term strategy to address potable water requirements, and sewage management. Nothing in the short term is identified to cope with additional loads. No additional lots should be approved within the Orford serviced area until the required infrastructure is built and able to cope with the increased demand for potable water, and commensurate increase in effluent volumes.

Should another treatment lagoon be added to the treatment plant to deal with increased effluent load, then the odour modelling presented as part of the DA would be irrelevant.

In summary;

- There have been (at least) two recent overflows of effluent Lagoon 4. The effluent goes down the creek that flows through the proposed development site. This creates a public health risk, and additional loads will only multiply this. I attach a photo of the sign on the Creek warning of the public health risk.

- The treatment plant is heavily loaded now and needs expansion (at least an extra lagoon). If TasWater agrees to do this, then many other assumptions in the planning document are violated.
- There is an identified water supply risk, which may be mitigated by additional infrastructure some time in the future, but at this point in time additional demands will exacerbate water restrictions for existing ratepayers.
- The modelled wind file used in the odour study does not match the measured winds at Orford from the BOM 1968-2022 dataset. As a result, the odour contours are incorrect. Further, aggregating the 9am and 3pm data averages wind speeds, therefore under-represents the significant periods of calm wind which are the primary source of concern for odour.
- The flow of the plant used for the odour modelling is incorrect. The SEAM report states the ADWF is 179kl/day, and this is the assumption the modelling is based on. The Taswater data (2022) indicates the ADWF is 281kl/day, and as high as 414 kl/day in some months – over double the assumed flows used in the SEAM report (pp94/286).
- The SEAM assertion that ‘the study did not consider upset conditions because there is little that can go wrong’ (pp96/286) is a significant weak point. Taswaters own reports indicate the variation in effluent between months is significant, and that the overtopping events and non-compliances in effluent quality clearly show upset conditions. As a rule of thumb waste water engineers use a multiplier of 3 for odour from lagoons exhibiting upset conditions. This renders the report findings almost nonsensical.
- Should another lagoon be built to address increased sewage needs, any odour modelling will be obsolete as well as incorrect.
- As the odour prediction is flawed, the best approach would be to adopt the buffer zone prescribed in Table 4-2 of the Tasmanian Planning Scheme.

For the projected 2050 population, the buffer distance is 400 m, which should be applied to the current proposal, and depending on the location of a new effluent lagoon, this may impact all the proposed development site.

I urge the council to assess the actual information, and consider what damage can easily be done if/when effluent starts running through properties, residents build in a strong odour zone and the coastal amenity of the area is significantly impacted. The actual damage, and reputational damage to the region would be massive.

Please reject this proposal on the grounds of common sense.

I am fully aware of my right to make further representation and provision of evidence to a TPC hearing. The professional advice I have taken is that it would be well worth pursuing this avenue to the final conclusion to delay or modify this ill considered proposal until appropriate infrastructure is in place

Kind Regards

A handwritten signature in black ink, appearing to read 'Sam Ibbott', is positioned above the printed name.

Sam Ibbott

sam@marinesolutions.net.au

0400697175

Effluent Spillage running through the proposed development site



Modelled Winds used in the Odour assessment.

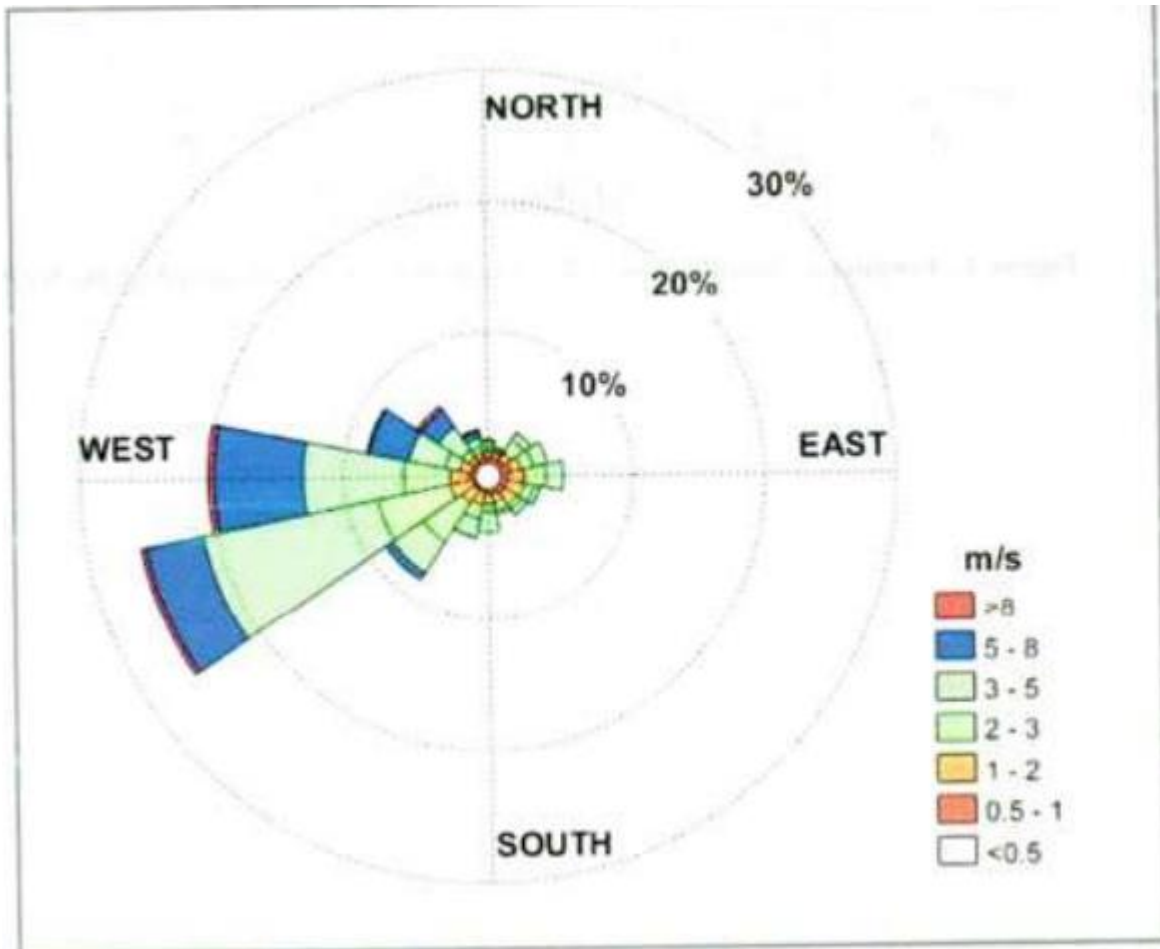


Figure 3. 2013 surface wind roses (m/s) predicted at the STP by TAPM.

Measured Winds at Orford 1968-2022

Rose of Wind direction versus Wind speed in km/h (01 Aug 1968 to 10 Aug 2022)

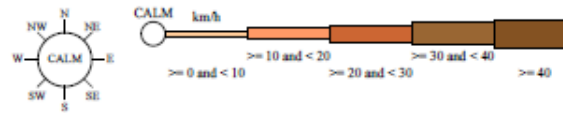
Custom times selected, refer to attached note for details

ORFORD (AUBIN COURT)

Site No: 092027 • Opened Jan 1951 • Still Open • Latitude: -42.5519° • Longitude: 147.8753° • Elevation 14m

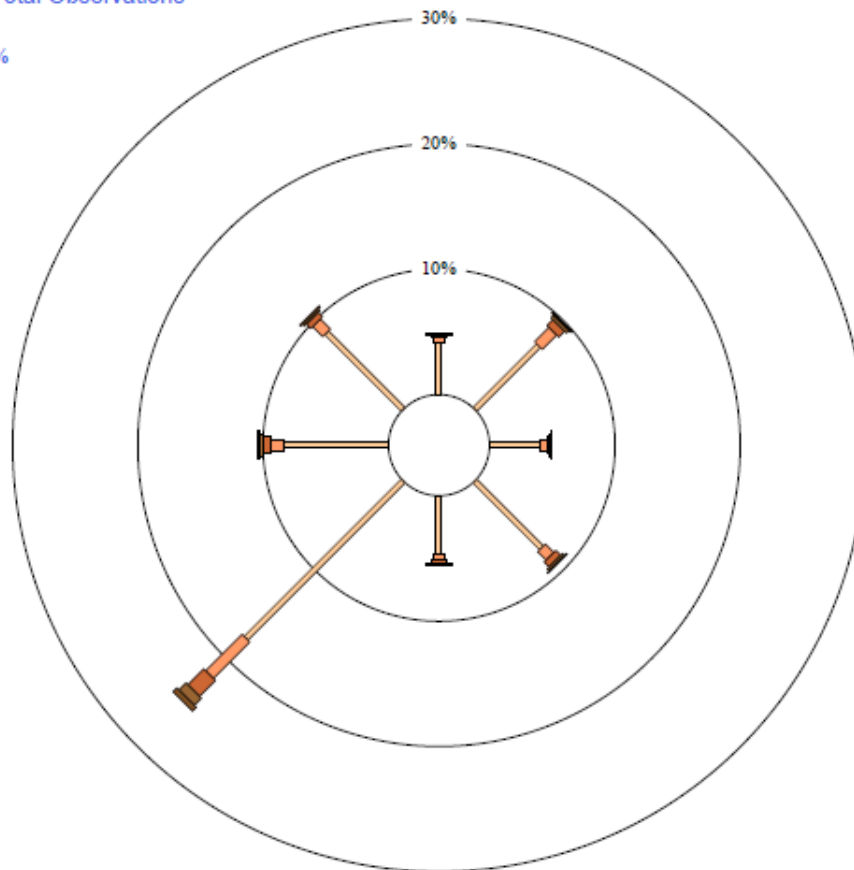
An asterisk (*) indicates that calm is less than 0.5%.

Other important info about this analysis is available in the accompanying notes.



9 am
18710 Total Observations

Calm 20%



Rose of Wind direction versus Wind speed in km/h (01 Aug 1968 to 10 Aug 2022)

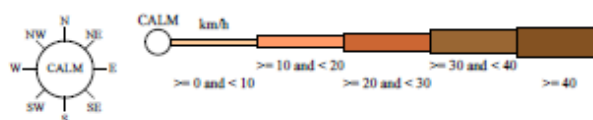
Custom times selected, refer to attached note for details

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3 pm
15948 Total Observations

Calm 10%

