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14 April 2020

Chief Executive Officer  
Sunshine Coast Regional Council  
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SUNSHINE COAST MAIL CENTRE QLD 4560

**Attention:** Jeff Dodd  
Via Email: [mail@sunshinecoast.qld.gov.au](mailto:mail@sunshinecoast.qld.gov.au)  
[jeff.dodd@sunshinecoast.qld.gov.au](mailto:jeff.dodd@sunshinecoast.qld.gov.au)

Dear Mr Dodd,

**Re: Seqwater Third Party Advice – MCU (Animal Keeping and Breeding Kennels for 200 Dogs and Cattery) – 2312 Steve Irwin Way, Landsborough – Lot 2 on RP180434**

Seqwater provides the following advice, following the applicant's response (23 March 2020) to Seqwater's Information Request of 4 December 2019.

Seqwater has reviewed the following relevant application material provided by the applicant:

- Response letter – Prepared by Adams and Sparkes, dated 23 March 2020;
- Amended Proposal Plans – Prepared by Jim Moehead, dated 11 December 2019;
- Stormwater Management Plan – Prepared by 360 Civil Consulting, dated 14 February 2020;
- Seqwater Development Guidelines Assessment – Prepared by Adams and Sparkes, undated; and
- Land Suitability Assessment for On-site Wastewater Treatment and Effluent Disposal – Prepared by Future Plus Environmental, dated 31 October 2018.

Following assessment of the material, generally, the response provides an inadequate address of a number of issues, including:

1. On-site wastewater management, particularly relating to the ability of a domestic wastewater treatment system to capably treat atypical wastewater from the proposed use, being a use not intended for domestic wastewater system receipt. As the use will involve a reduced proportion of

faecal solids to typical wastewater, significant quantities of animal fur as well as a number of cleaning products, antibacterials, disinfectants and possible pesticides (dog washdown and kennel cleaning), the efficiency of an aerobic treatment process may be compromised. The Land Suitability Assessment (section 4.5, page 6) refers to a need to address this concern at the detailed design stage, however an appropriate solution has not been provided in the application stage, which is considered necessary.

It is noted that a sewer main is available to the west of the property. Connection of the site to reticulated sewer would remove contamination concerns presented by the on-site treatment of atypical wastewater.

2. Capture and treatment of stormwater from the activity areas central to the kennel facility. Stormwater from this will contain significant faecal contamination and is considered to pose a risk to downstream water quality in Ewen Maddock dam.
3. The use, storage and disposal of pesticides and other chemicals / products posing a risk to local water quality.
4. Flood extent over the property has not been detailed on a site plan, to ensure that all development and the effluent land application area remains outside the 1% AEP inundation area.
5. No details have been provided on the location, handling, storage and removal of faecal solids collected from kennels and activity areas.

Should Council determine to approve the development, Seqwater recommends the following conditions to alleviate some of the above concerns:

1. A Site and Soil Evaluation compliant with the Seqwater Development Guidelines for Water Quality Management in Drinking Water Catchments 2017 and the Land Use Risk Tool is provided to Seqwater for review and approval, prior to commencement of the use. The report must be generally in accordance with the Land Suitability Assessment (prepared by Future Plus Environmental, dated 31/10/2018) and must address and resolve concerns relating to the atypical wastewater generated by the development and treatment capability by a domestic wastewater treatment plant. The report must be prepared by a suitably qualified, QBCC licenced wastewater consultant ('Site Classifier' and/or 'Hydraulic Services Design' licence class).
2. The effluent land application area must be located above the 1%AEP flood level.
3. The disposal of treated effluent to land must not be by way of surface spray or covered surface drip irrigation, but instead, by a sub-surface method.
4. Wastewater diverted to any on-site wastewater treatment facility must be treated to a minimum advanced secondary standard.
5. Any on-site wastewater treatment facility, as well as pipelines and disposal areas must be maintained appropriately, being inspected and repaired as necessary, in accordance with the manufacturer's recommendations or at least twice yearly.
6. All use areas, buildings, wastewater treatment facility and effluent disposal area must be set back a minimum of 400m to the Full Supply Level of Ewen Maddock dam, located at 25.38m AHD. A survey

plan demonstrating this must be submitted and signed off by Council prior to commencement of the use.

7. All use areas, buildings, wastewater treatment facility and effluent disposal area must be set back a minimum of 50m to any Stream Order 1-3 watercourses on or near the subject site.
8. All faecal solids are to be collected from the exercise / activity yards and kennels of both the accommodation and breeding facilities daily. Faecal solids are to be placed into sealed receptacles and stored appropriately (bundled, impervious surface and covered / weatherproof) for regular collection by a licenced waste contractor for appropriate disposal off site. The waste contractor must be certified to deliver the waste to a municipal wastewater treatment facility. Waste must not be disposed of in landfill. Suitable arrangements for this process must be confirmed prior to commencement of the use.
9. Disposal of dog and kennel washdown wastewater must be directed to a designated sump point, diverted to sewer or the on-site wastewater treatment system.
10. A filtration device is to be provided for the purpose of removing hair and other solid wastes from wastewater prior to diversion to the treatment system. The device must be regularly cleaned out and collected solids placed in the faecal solids containment vessels.
11. Pesticides, cleaning / disinfecting / antibacterial products must be stored in a weatherproof structure on a bunded handstand surface, in quantities not exceeding 200L / kg. Any spills must be cleaned up and appropriately disposed of immediately. A spill kit must be made available to facilitate this.
12. All cleaning and other products used in the facility must be safe for discharge to the on-site wastewater treatment system, and used in the lowest possible quantities.
13. No earthworks or vegetation clearing shall occur within 25m of a Stream Order 1-3 watercourse, or on a gradient exceeding 15%.
14. All vehicular and pedestrian movement paths and parking areas must be either sealed or a gravel surface. All paths and driveways must be maintained so as to prevent stormwater erosion and sedimentation of local watercourses and Ewen Maddock dam.

Seqwater requests a copy of Council's Decision Notice in due course. Should you have any queries regarding the above, please contact Leah Snerling, Senior Land Use Planner, at [planning@seqwater.com.au](mailto:planning@seqwater.com.au).

Yours sincerely,

**Medina Handley**  
Integrated Planning Coordinator