

16 May 2022

The Development Manager
AOYUAN GROUP
Suite 30.02, Level 30
420 George Street,
SYDNEY NSW 2000

RE: CHELSEA GARDENS - INTERIM WASTEWATER TREATMENT PLANT (IWTP) - MODELLING

True Water has been engaged by Aoyuan Group to provide comment on the suitability of modelling completed by Strategic Environmental & Engineering Consulting (SEEC) for the Chelsea Gardens Estate IWTP.

Part 1 - Suitability of SEEC Modelling

The modelling completed by SEEC is in line with regulatory requirements and best practice principles. The modelling correctly considers relevant factors and employs established methodology.

In True Waters experience, the modelling is suitably structured and informed, and will be accepted by local and state government regulators throughout Australia.

Part 2 – Should *plant water requirement* be applied to modelling?

Generally, the *plant water requirement* is applied to modelling to confirm favourable crop types or required watering regimes for irrigation schemes servicing commercial cropping (agriculture), or long-term turf irrigation for golf courses or sports fields.

The Chelsea Gardens Estate irrigation will not service commercial cropping (agriculture) and will not provide long term turf irrigation. Irrigation will be for short term effluent dispersal. Therefore, *plant water requirement* is not a consideration.

Plant water requirement should not be applied to modelling.

Conclusion

Documentation and modelling conducted by SEEC is accurate, reflects industry best practice, and regulatory requirements. In True Water experience, SEEC's documentation and modelling would be approved by state regulators throughout Australia.

Note: DA 21/0772 for the IWTS has been approved with concurrence from Water NSW.

Yours Sincerely,



Jim Mahoney
Director – Design & Consultancy Group
True Water Community

Suitability to Peer Review

True Water is a specialist wastewater company that acquire local and state government approvals for wastewater projects throughout Australia.

Active in all states of Australia True Water have a strong understand of various regulatory landscapes and governing best practice principles.

Chelsea Gardens Estate

True Water have been engaged to secure the Operator's License for the Chelsea Gardens Interim Wastewater Treatment Plant (IWTP). Due diligence completed prior to engagement included a detailed review of relevant project information, document, and modelling to ensure suitability for regulatory approval.

True Water - Experience

True Water have acquired more than 2,000 government approvals for site specific WWTP's and delivered more than 1,500 WWTP's throughout Australia and the Pacific. WWTP's delivered by True Water have a combined treatment capacity of approximately 5,400,000Litres per day.

True Water past and current projects / regulatory approvals include:

| WWTP Capacity (Effective Population) | Location | Regulator |
|---|------------------|-------------------------------|
| 6,700 | North Brisbane | QLD Department of Environment |
| 5,000 | Toowoomba QLD | QLD Department of Environment |
| 3,450 | Ipswich QLD | QLD Department of Environment |
| 3,000 | Papua New Guinea | AusAID - Federal Government |
| 2,700 | Greenbank QLD | QLD Department of Environment |
| 1,600 | Tweed Shire NSW | NSW LGA |
| 1,100 | Gladstone QLD | QLD Department of Environment |
| 1,000 | Emerald QLD | QLD Department of Environment |
| 800 | Toowoomba QLD | QLD Department of Environment |
| 600 | Katherine WA | West Australian EPA |
| 550 | Cook Town QLD | QLD Department of Environment |
| 500 | Newcastle NSW | NSW LGA |

Please note: the Chelsea Gardens Estate IWTP is expected to service <500EP.