



**Gundaroo Community
Association Inc.**
c/- Post Office
Gundaroo NSW 2620

President: Moraig McKenna
Secretary: Natasha Flores
Treasurer: Gina Collins

Submission to consultation on: Kyeema Wastewater Pty Ltd // Gundaroo – Network Operator’s and Retail Supplier’s Licensee application

We would like to point to two areas of concern that the Gundaroo Community Association (GCA) sees in relation to this application: Water availability and Population growth.

1. Water Availability

The Kyeema development will rely on rainwater collection by individual households. This is in line with the situation in the existing village. However, without on-site waste water treatment, the effluent can’t be used for watering (parts of) gardens, instead being used for irrigation away from the dwellings. In our view this will increase fire risks, especially in dry times as trucking in additional water is expensive. Self-imposed water restrictions in such circumstances may also compromise the operation of the sewerage system itself. The WS-POL-2 requirements state that the minimum tank size for a 150 m² dwelling is 45,000 liters. This is not likely to be enough if all on-site irrigation has to be supplied from that. The only example known to us of a township with reticulated sewerage but no town water is Waratah Bay in Victoria where annual rainfall is significantly higher (>1000 mm) than in Gundaroo (~650 mm). Future rainfall in Gundaroo is not likely to be higher in the future, but evaporation rates are certainly going to increase. Future water scarcity is going to make the scheme nonviable.

2. Population Growth

The South East and Tablelands Regional Plan (SETRP) of July 2017 stated that the villages of [...] Gundaroo, Sutton and Wee Jasper are expected to retain their small village character and only accommodate minimal growth. In addition, the Yass Valley Settlement Strategy budgets a 35% growth for “Gundaroo and district” between 2016 and 2036. These documents have been prepared with community input and formal consultation, and should therefore be considered as strongly guiding, even if not legally binding.

If the Kyeema development goes ahead as planned, with 2000 m³ lots, it would on its own result in 30% growth of the population in the village. Given that there is another development planned at the southern side of the village and there is considerable growth within the existing village boundaries, population growth over the next two decades could easily turn out to be 100%. None of these numbers can be considered minimal.

We believe it would be in the public interest to limit the increase in block sizes in this development to 5000 m³ and this would make reticulated sewerage unnecessary under the zoning of the relevant land.

According to clause 10.4.f of the Water Industry Competition Act 2006 matters having regard to the public interest may be reason for the Minister not to grant a license, so we call on the Minister to take these concerns into consideration and reject the application for Kyeema Waste Water for a Network Operator’s and Retail Supplier’s Licensee.

Warm Regards
Moraig McKenna
President Gundaroo Community Association