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Our ref ER22684

Dear Ms Makin

**PLANNING PROPOSAL – “KYEEMA” GUNDAROO ROAD,
GUNDAROO (PP-2012-03) – SUPPLEMENTARY INFORMATION**

I refer to your letter dated 14th August 2014 requesting comments on additional information provided in support of the planning proposal to rezone land known as “Kyeema” at Gundaroo. Initially reference is made to the Office of Water’s response dated 16th December 2013 on this matter. The NSW Office of Water appreciates the opportunity to comment and requests the following comments be considered in finalising the proposal.

- The NSW Office of Water concurs with Council’s concerns over the potential for proliferation of bores. This is recognised primarily due to the demands for non-potable and potable water which have not been adequately serviced for by the planning proposal. As recommended previously a reticulated water supply (a non-potable supply may be sufficient) is necessary to support the proposed lot sizes or alternatively a larger lot size to accommodate necessary environmental buffers. The minimum 250m buffer distance required between all existing and new domestic and stock bores and effluent disposal sites remains within the *Water Sharing Plan for the Murray Darling Basin Fractured Rock Groundwater Sources 2011* (WSP). Therefore Council and the developer need to be aware that any potential reliance on groundwater for a water supply by this development needs to be consistent with the distance rules set out in the WSP.
- Mechanisms such as 88B Restrictions to limit bore growth do not address the key issue of ensuring an adequate water supply is available for the development. Further to this such mechanisms will require compliance by Council, hence it is generally recommended that adequate planning for servicing via lot sizes or reticulated services are the primary tool to manage the water resource.
- The response from Soil and Land Conservation Consulting refers to a CSIRO report. The Office of Water reviewed a CSIRO Report titled “*Holistic solutions to management of on-site wastewater treatment systems over a karstic aquifer used for drinking water supplies* (March 2009)” assumed to be the same report. Soil and Land Conservation Consulting infer based on the investigations undertaken as part of the CSIRO report that there is no impact to groundwater from Aerated Wastewater Treatment Systems (AWTS). The following comments are provided in response to this report:
 - o The CSIRO report was an area specific study that did not directly address the potential impacts of effluent irrigation in areas where there is a high concentration of houses such as rural living blocks or larger urban blocks such as at Gundaroo.
 - o The Office of Water’s concern with AWTS is that their use in concentrated areas may cause potential impacts on groundwater. It was a recommendation from the

CSIRO report "that as more rural areas are subdivided for higher density housing (eg. rural living blocks) council could investigate decentralised wastewater treatment options.....that is managed either by Council, a utility or a private operator".

- o The Office of Water supports the recommendation of Council investigating decentralised wastewater treatment options for higher density housing such as that proposed at "Kyeema".
- The NSW Office of Water is supplied with limited data in terms of groundwater quantity and quality upon drilling of each bore. A review of some of the bore logs in the vicinity of Gundaroo indicates bore yields are generally less than 1L/sec and the salinity is fresh or good.
- Groundwater monitoring will be valuable where some form of effluent irrigation is proposed. Ideally a minimum of 3 monitoring bores should be constructed to enable the monitoring of the groundwater flow in the area of the development, the background quality and the onsite groundwater quality.

Should you have any further queries in relation to this submission please do not hesitate to contact Tim Baker on (02) 6841 7403.

Yours sincerely



Mitchell Isaacs
Manager Strategic Stakeholder Liaison
4 September 2014