

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: SUBMISSION - FNC Water Strategy.

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To whom it may concern,

I am a local to the area of Dunoon, having bought here seven years ago. I am also a local to the Northern Rivers, having lived on a property in Cumbalum for my childhood. I do not support this dam for a number of reasons listed below.

Firstly, I want to thank the DPIE for the work they have done so far, you have developed the Water Strategy, however, the strategy cannot rely heavily on the Rous's Future Water 2060 project, as that plan relies heavily on the proposal of the Dunoon Dam.

Below are some of the reasons I object to the Dunoon Dam.

- Lost opportunity to invest in system-wide water efficiency - this is the cheapest & fastest way to ensure supply-demand balance. By focussing on system efficiency, Sydney added an additional 950,000 people without a rise in consumption. (Metropolitan Water Plan 2006, NSW Government) (1)
- The 21st century is about a suite of smart water options. This dam would be a lost opportunity to make our system fit for the 21st century. It would swallow all resources in one big expensive 'white dinosaur' project.
- The dam would encourage continued inefficient and often wasteful water management by local governments. They would have no incentive to do things differently.
- Destruction of important Indigenous cultural heritage, including burial sites (Cultural Heritage Impact Assessment, 2011)(2). Ongoing disregard for First Nations' heritage.
- Destruction of The Channon Gorge and its endangered ecological community of lowland rainforest (including regionally rare warm temperate rainforest on sandstone), and its threatened flora and fauna species. (Terrestrial Ecology Impact Assessment, 2011)(3).

Rous is planning to offset the loss of rainforest on sandstone with regeneration of degraded land in the buffer zone. Offsetting is problematic because the type of vegetation offered as recompense is never equivalent. This example is worse than most. (Nan Nicholson, botanist)

Councils are required under State planning regulations to: "Focus development to areas of least biodiversity sensitivity in the region and implement the 'avoid, minimise, offset' hierarchy to biodiversity, including areas of high environmental value." NSW Department of Planning, Industry and Environment 2019, 'Delivering the plan', Sydney, viewed 03 August 2020 <<https://www.planning.nsw.gov.au/Plans-for-your-area/Regional-Plans/North-Coast/Delivering-the-plan>>, Direction 2: Enhance biodiversity coastal and aquatic habitats and water catchments. (4)

Rous is required to avoid this destruction because there are economically viable and more effective solutions.

- Industrial/construction zone for The Channon/Dunoon community; noise, machinery, trucks, visual impact. Ongoing sound impact from pump house etc.
- Higher prices for consumers due to a 4x increase in the cost of water. Rous general manager, in response to a question from councillor Vanessa Ekins, said he expected a fourfold increase in the cost of supplying water if the dam is built.
- The small population increase predicted for the four Rous-supplied councils of 12,720(5) between 2020-2060 does not justify such a large and destructive dam. The dam risks being an expensive white dinosaur, diverting expenditure away from more sustainable, flexible and effective solutions. NSW Department of Planning, Industry and Environment 2019, 'NSW population projections', Sydney, viewed 03 August 2020, <<https://www.planning.nsw.gov.au/Research-and-Demography/Population-projections/Projections>> scroll down to "Local Government Factsheets".(5)
- Catastrophic flooding downstream in worst floods, particularly for the first 3 kilometres below. (Environmental Flows Assessment 2011)(6)

I SUPPORT these alternatives:

I believe we need to take action on a suite of smart water options and proven alternatives.

The tide is turning on renewable and sustainable power. It is time for the tide to turn on how we meet our water needs too. This is 21st century thinking.

- An investment in system-wide water efficiency and strong demand management. Analysed, costed and deployed, creating jobs. (We understand Rous has not costed this in creating their future water plan)
Existing research over the past decade consistently finds that the best 'bang-for-buck' investment in water supply comes from demand management and identifying savings within the existing supply.(7) (8)

- Water re-use in various ways, including Purified Recycled Potable water.

A wealth of global research and experience already exists regarding potable reuse of water as set out in Water Research Australia's report, Potable Water Reuse: What can Australia learn from global experience? [https://www.waterra.com.au/publications/document-search/?download=1806\(9\)](https://www.waterra.com.au/publications/document-search/?download=1806(9))

Example: The city of Windhoek in Namibia in Southern Africa has been using purified recycled water for 30 years using advanced technology. [https://www.wingoc.com.na/our-history\(10\)](https://www.wingoc.com.na/our-history(10))

- Water harvesting (urban runoff; rain tanks):

Water tanks on all new (and existing) developments.(11) This builds community resilience - much needed, as the recent extreme bushfire season has shown.

The Australian government advises that: "Depending on tank size and climate, mains water use can be reduced by up to 100%. This in turn can help: reduce the need for new dams or desalination plants; protect remaining environmental flows in rivers; reduce infrastructure operating costs."

Rainwater harvesting also decreases stormwater runoff, thereby helping to reduce local flooding and scouring of creeks.(12)<https://www.yourhome.gov.au/water/rainwater>

- Contingency planning would enable Rous to be ready to rapidly implement supply measures if it becomes necessary in times of drought.

- Groundwater, where this is environmentally safe

The Australian government provides a lot of information on the ecological impacts and groundwater usage.(13)

<https://www.environment.gov.au/water/publications/what-are-the-ecological-impacts-of-groundwater-drawdown>

With scalable supply alternatives in place, the existing supply from Rocky Ck Dam will be made resilient to anticipated times of drought and projected population growth, without the environmental destruction, social costs, and the over-capitalisation risk of an oversized and unnecessary dam.

I hope you consider the above points.

Kind regards,

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