



12 October 2012

Director
NSW Department of Planning and Infrastructure
GPO Box 39
Sydney NSW 2001

Ref Number 10_0235

Dear Director

Re: Objection to the proposed Macquarie River to Orange Pipeline / Orange Drought Relief Connection, following exhibition of the Environmental Assessment on the Department of Planning website during September & October 2012.

Submission 1 – Unjustified project and inadequate water planning

I am writing to directly object to the proposed Macquarie River Water Pipeline from the Macquarie River to Orange, and to highlight substantial inadequacies in the projects Environmental Assessment (following a period of public display).

As a resident of Orange, I appreciate being invited to comment on the project and Environmental Assessment, and I wish to make the following submission for consideration by the NSW Department of Planning and Infrastructure.

In my judgement, the Orange City Councils Water Strategy and this Macquarie River pipeline project is substantially flawed and I believe the project proponent has deliberately presented information in a selective way to the NSW Department of Planning and Infrastructure in an attempt justify a significant infrastructure project – which most of the Orange community believe will do very little to buffer Orange from future drought events.

After reviewing the Environmental Assessment, I have serious concerns about the suitability of this major infrastructure project on the following grounds:

1. **The project route to the Macquarie River is yet to be determined.** Therefore the Environmental Assessment has been developed and presented to the NSW Government and Commonwealth Government prematurely. It is therefore unable to identify the full range of impacts of the project and should be withdrawn from the Department of Planning until such time as a route is determined and an Environmental Assessment is conducted on that route. Alternatively, the project proponent should conduct and present a series of Environmental Assessments on all proposed route options to the Macquarie River for consideration by the Dept of Planning and Infrastructure.
2. **The proponents' water consumption model over-estimates the water demand of Orange by 80% per person.** Orange residents consume an average of 225 Litres per person per day, not the stated 404 L/p/day (as per proponents EA). The

residents of Orange and Orange City Council have worked hard over recent years to reduce water consumption to 225 L/p/day, and the Macquarie River project is based on an unrealistic consumption rate. The estimate of 404 L/p/day is an inflated figure and the proponent should supply modelling based on Oranges real demand of 225 L/p/day.

3. **High consumption model unethical and strategically risky.** The proponents are seeking to establish a high consumption model, whereby water is pumped from the Macquarie River to top up the Suma Park Dam when storage drops below being full. Their models support “unrestricted supply” which they have stated publically, which is not only highly unethical but strategically risky. Establishing an unrestricted supply model will lead to unrestricted consumption, and this will ultimately set Orange up for a major shortfall in future droughts (that impact on local water storages and the Macquarie River simultaneously).
4. **This project is not part of a regional water solution.** The Central Tablelands region requires a regional infrastructure project, not a single stand alone pipeline that will be for the Orange township alone. The NSW Government should be supporting regional water projects, including increased stormwater harvesting in all Central West towns (Dubbo, Bathurst, Molong, Cowra, etc).
5. **The projects initial construction costs are not justified.** The project will cost an estimated \$47 million which is not justified when a regional solution is required, and when Orange has a range of other water supply options for the next 10 years. An investment of state funding is greatly appreciated, but it should be directed to a more scientifically sound, regionally-focused and environmentally responsible project rather than the current project under consideration.
6. **The projects ongoing costs are not justified.** The Macquarie River water harvesting is modelled to provide an average of 1616 ML /year to Suma Park Dam and an average of 1300 ML/year currently spills over the Dam wall back into the Macquarie River. The cost of pumping water in this circular system (using current electricity charges) is \$800,000 per year. This is an exorbitantly high cost for an average net supply of 316 ML/year water.
7. **The Orange region has more suitable viable sources of water** in existing infrastructure and readily available equivalent to greater than 5,300 ML / year, including enlargement of the Suma Park Dam (100-200 ML/year), enhanced use of Blackmans Swamp Stormwater harvesting Stage 1 (1300 ML/year) , ground-water in south Orange (>1,000 ML/year), bores in the Orange township (450 ML /year), Blackmans Swamp stormwater harvesting Stage 2 (1679 ML/year), Blackmans Swamp stormwater harvesting Stage 3 (2576 ML/year), Ploughmans Creek stormwater harvesting (700 ML/year) rainwater tanks, water sensitive urban design, groundwater aquifer recharge, treated water reuse/indirect potable water reuse, and water-efficient infrastructure. The proponent has adopted an unrealistic approach to supplying water to Orange, and has disregarded the options above which were recommended by Council staff less than 5 years ago.
8. **The Environmental Assessment has failed to address many issues.** It has been prepared in a rushed manner, and as a consequence, many aspects of the EA have been undertaken poorly. The project proponent has failed to adequately assess the projects impact on Terrestrial Ecology - see Submission 2. The

currently proposed access route to the River will adversely impact of significant habitats, threatened species, ecological communities, ecological processes, cultural and aesthetic areas, and will require a long-term land management program. This is unacceptable in the opinion of Orange residents and local landholders.

9. **Water extraction would place the Macquarie River under high stress.** The proponent proposes to extract up to 12 ML / day from the Macquarie River when the river contains as little as 38ML /day. This would impact on native fish species, native fauna (such as platypus), and many native fish species recovery programs which have taken years to develop. Extraction of 12ML of water at such low flow scenarios could place many rock holes and riverine habitats under threat. This would have a cascading impact on the ecology of the river well downstream. A large angling/fishing community would also be adversely impacted.
10. **Community consultation lacking.** I am also very concerned that the proponent has prepared the Environmental Assessment without sufficient consultation with local community groups, landholders, users of the Macquarie River, the general public of Orange and surrounding townships. The proponent has formed a series of committee's but has failed to make a genuine attempt to engage with the community regarding issue on this project. The concerns of residents are very quickly dismissed by the proponent. This poor standard of community engagement is less than satisfactory.

Thank you for the opportunity to comment on the Environmental Assessment documentation, and for considering the interests and values of the Orange community in this important issue.

Sincerely

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