



## **Submission to IPART : Wollondilly Water - Bingara Gorge/Wilton WICA application, Network and Retail supplier.**

Wilton is a small rural village 80kms SW of Sydney in the Wollondilly Shire. It lies between the Hume motorway and Thirroul on the Illawarra escarpment, nestling on the edge of precious water catchment land.

Wilton faces development on a scale not seen in NSW before. The city planned is the largest new city in NSW for over 100 yrs and will be on the scale of Bathurst or Port Macquarie.

Wilton Action Group (WAG) aims to ensure this new "Town" is an innovative, sustainable, healthy and harmonious community. We are a group of volunteers that are working together to ensure the best possible outcome for the existing and new residents of Wilton, taking into account that there are several developers all with adjoining development parcels of land, which will all contribute to forming the new and larger Wilton, abutting the existing town. This creates challenges as cooperation between developers has been strained at times. We aim to prevent "cookie cutter" dormitory suburbs that only serve Developers profits (as has been the case in other regions), and are advocating for services, infrastructure, education and employment. WAG also aims to advocate for the environment and the creatures who don't have a voice.

**We are concerned about the implications of Wollondilly Water / Lend Lease taking on the WICA licence. They are just one of four commercially competitive developers that are providing land for development in Wilton. We are concerned that the WICA licence will be a barrier to Sydney Water being able to provide a single wastewater solution for Wilton. And we are also concerned that the WICA licence will result in Wilton becoming a multiple wastewater plant town. This compounds the visual, odour and environmental impact on the community. No other community in the Sydney Basin has to tolerate multiple sewage treatment plants in the one town, and we don't believe Wilton should be any different.**

**We must ensure community and environmental needs are met**, and remain the primary focus of the scheme. This is despite some of the development being "out of sequence", ie the existing Bingara Gorge development, and other parts of it being determined as "in sequence" ie the recently rezoned Wilton South East. We request IPARTs assistance in ensuring the existing plant built to service Bingara can be progressively upgraded to service all the stages of the whole of the Wilton development, which is likely to eventually service a population of 60,000.

It is important that **all the development in and around Wilton be allowed to connect in to the Bingara plant** (which may trigger the need for upgrading or upsizing) to avoid the Wilton community and environment bearing the risk of several small package plants being installed (or long term tinkering solutions, which are equally undesirable, inefficient and costly and increases truck movements in residential areas). We want a one sewage plant town, as this is what other normal communities have. Centralise the sewage services to ensure they are of sufficient size to operate efficiently, are adequately staffed and operated by experienced staff who are on site for a large portion of time, and reduce the risk of poor water quality nutrients and odour being discharged to the environment.

**Recommendation: That a clause be added to the WICA contract to the effect that the company must upgrade, expand or alter the works under commercial agreement with Sydney Water if they so request it.**

**Preventing undue market influence.** Considering these developers are effectively competitors in the market for the supply of housing, will the conditions of the WICA licence prevent the licence holder (who is the an established developer in the area with more blocks of land to sell) from having undue market power in Wilton and using that power unfairly to advantage the sale of their own lots of land over those of their local competitors?

The best possible solution for the untenable situation that the town, community and environment of Wilton finds itself in, would be for the several separate developments to be sold to one developer who could then unify the area and bring it back to a master planned community. This would allow development in sensible stages with logical connections and servicing, rather than the strange patchwork that we are about to experience, with pocket pieces of housing being proposed which are not ideally located for sensible staging of wastewater servicing. However, with market forces as they are currently, and developers not all wanting to go to market as a group, we cannot see this happening.

Ultimately, we want to ensure that the multiple different developers are not forced into a situation that causes the wastewater provisioning of new areas in Wilton to be driven by finances instead of the best wastewater design. It is difficult to get these developers to agree and cooperate, so from the communities perspective, the best possible solution would ultimately be for Sydney Water to control the wastewater provisioning, not one of the developers. We are not sure if WICA licensing is the best outcome in this regard, and we are generally quite unhappy about the amount of oversight and public accountability of the scheme.

We are not confident that reports of problems within the current scheme are being passed on as required by the operators to the relevant authorities, as it seems that these reports either don't exist, or are very difficult to find. We are aware that reports of brown water, no water, and other such problems have been made from consumers inside the recycled wastewater network, but these complaints do not seem to be making it into the annual reports. Ultimately, public trust is based on transparency. It is important that reputation at risk is not a consideration in the public accountability of WICA schemes, but as they are operated by companies that have reputations that they rely upon to conduct business, I do not see how this does not produce a massive incentive to not adequately report.

We hope that those that are charged with granting the WICA licence can do so by addressing the above concerns, perhaps by ensuring the licence requirement states the need to serve the community? We are really concerned that the WICA licence will be a barrier to ensuring the best wastewater servicing option is available for the multi developer town, with out of sequence development and in sequence development. Please can you help in any way possible to ensure we don't end up with 3 or 4 sewage works impacting the community visually and odorously, and placing our rivers at risk of discharges and nutrient contamination.

Yours Sincerely,

[REDACTED]

On behalf of the Wilton Action Group

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