

The application for licencing by Cooranbong Water (CW) should be rejected by IPART for the following reasons:

- There has been no cost/benefit analysis provided by the proponent to using Marconi Rd. as opposed to building new plant. The proponent appears to argue that such cost benefit is not necessary however it seems to contradict common sense that unnecessary expense must be added to land costs in the area proposed to be serviced.
- There has been totally inadequate project information provided by CW and community consultation regarding the facility has not been conducted in accordance with State Government or Lake Macquarie Council (LMCC) standards.
- There is adequate capacity to service the area proposed to be serviced by CW under this application at the Hunter Water sewerage treatment plant in Marconi Rd. Morisset. This plant has recently been upgraded and the capital works costs are now being paid for by Hunter Water customers in this area. If the proponent utilized Marconi Rd. capacity more customers would benefit from lower service costs.
- The proposed location of the plant is totally inappropriate. To locate such a plant within meters of existing residential dwellings in a builtup area beggars belief. The local community has submitted over 140 negative submissions to LMCC in respect of both the development application for the project and the rezoning of the land of its site.
- I am not sure that potential buyers of the proposed serviced land will appreciate either the added cost or inconvenience of having a 'septic like' storage tank and pump on their land as is part of the CW proposal. These tanks are a requirement of Hunter Water to buffer flows in times of maintenance and emergency. A connection to Marconie Rd. eliminates the need for these tanks and pumps. Such tanks and pumps are not what we expect from 21st Century technology.
- The Cooranbong area has experienced a recent extreem storm event. The site of the proposed plant is marginally above the flood plane of Dora Creek. The extensive flooding of this plane post storm is indicative of the impossible nature of controlling acceptable overflow from the proposed plant.

For all the above sensible reasons IPART should reject out of hand the application by CW for a licence to build and operate the plant for which this submission applies.