

From: [cleva](#)
To: [submissions](#)
Subject: The Byron Shire Recycled Water Management Strategy 2017 – 2027
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Below is my submission to the The Byron Shire Recycled Water Management Strategy 2017 – 2027.

By Matthew O'Reilly

219 the Saddle Road, Brunswick Heads

I have a major problem with the strategy as it relates to future urban uses.

- The Draft Byron Residential Strategy and the Draft Byron Employment Land Strategy have not been referenced at all in the The Byron Shire Recycled Water Management Strategy 2017 – 2027.

As significant new residential and industrial land developments are proposed in both the residential land employment land strategies. Dual reticulation needs to be a requirement and condition of all the new proposed green and brown fields development in both these strategies.

The failure to integrate the The Byron Shire Recycled Water Management Strategy 2017 – 2027 and the Byron Residential Strategy and the Byron Employment Lands Strategy is a MAJOR failing.

The The Byron Shire Recycled Water Management Strategy 2017 – 2027 needs to be deferred until the Residential Land and Employment Land Strategies have been confirmed by the Council and the Minister. The The Byron Shire Recycled Water Management Strategy 2017 – 2027 should then be redrafted to include these new approved growth areas.

- The The Byron Shire Recycled Water Management Strategy 2017 – 2027 has also not included any reference to the Byron Rural Land Use Strategy or the Byron Sustainable Agriculture Strategy.

A full audit of all Agricultural water uses in Byron Shire should be made including Nurseries, Garden Centres, Horticultural Production (Bananas, Macadamias, Cut Flowers, Orchards, Fruits and Vegetables), Irrigated Cropping, Turf Production, Sugar Cane Farming, Tea Tree farming, Coffee, Essential Oil Trees, Irrigated Pasture, Aquaculture etc.

All commercial water use for Agriculture in Byron Shire (with the exception of stock watering) requires a valid water access license issued by Water NSW.

Byron Council needs to audit which Agricultural business

have legal Water Access Licenses and which businesses are utilising water illegally. It is these illegal water use businesses that should also be targeted as part of the The Byron Shire Recycled Water Management Strategy 2017 – 2027.

- The Byron Shire Recycled Water Management Strategy 2017 – 2027 does not include additional potential urban recycled water used that should be investigated in the Brunswick Valley. These include:

- The Ocean Shores County Club /Gold Club
- Industrial land used in Billinudgel and Mullumbimby
- Brunswick Heads Bowling Club
- Brunswick Heads Sporting Fields
- Water Lily Park- Ocean Shores
- Terrace Reserve Holiday Park
- Massey Green Holiday Park
- Ferry Reserve Holiday Park
- New Brighton Sporting Fields
- Raja Road Sport Field
- Mullumbimby Sporting Fields
- Mullumbimby Bowling Club
- Mullumbimby Golf Club
- Other Council parks and sports fields in Mullumbimby, Brunswick Heads, Ocean Shores, South Golden Beach and New Brighton
- Proposed new Industrial land near Tyagarah aerodrome, Wreckers Corner, Manns Road etc.
- Proposed new Urban land developments at Tallowood Ridge, Bayside Brunswick Heads, Mills Estate, Station Street - Mullumbimby, Saddle Road - Brunswick Heads etc.

All of these additional users should be included in a formal cost benefit analysis to extend the Recycled water trunk lines to all the Brunswick Valley Villages.

- It should be a core part of the Byron Shire Recycled Water Management Strategy 2017 – 2027 that ALL new housing developments and NEW subdivisions and NEW strata sub-divisions are required to install dual plumbing in preparation for future recycled water reticulation running along all urban streets.
- The Byron Shire Recycled Water Management Strategy 2017 – 2027 once again is making unrealistic claims about rural water use just as the last strategy did in relation to Main Arm reuse. Not enough detail is provided relating to the West Byron Rural Water re-use and the future Main Arm reuse expansion. This lack of detail is troubling and seems to indicate that they are just included to make the strategy "look good". If something has not worked in the last strategy then evidence needs to be provided why it will work this time. The information provided is too vague and ambitious. It needs to be changed to reflect better evidence and a clear business case and cost benefit analysis.

- The Byron Shire Recycled Water Management Strategy 2017 – 2027 completely writes off urban recycled water reuse in villages in the Brunswick Valley including Mullumbimby but no clear evidence, facts or figures are provided to substantiate this claim. Additionally, while recycled water can be used for dual plumbing no figures are provided for the use of recycled water in private urban gardens. If dual reticulation were installed in all the streets of Byron Bay, Mullumbimby, Brunswick Heads and Ocean Shores how much would it cost and how much water could potentially be used?



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