



Parramatta River
Catchment Group



LET'S MAKE OUR RIVER
SWIMMABLE AGAIN BY
2025



Reference: 015-20SJ

Tuesday, 21 April 2020

Re: Greater Metropolitan Water Sharing Joint Submission

To whom it may concern,

Thank you for the opportunity to comment on the *Greater Metropolitan Region Unregulated River Water Sharing Plan (WSP)*. This submission was prepared jointly by Sydney Coastal Councils Group (SCCG) and the Parramatta River Council Group (PRCG).

The Sydney Coastal Councils Group (SCCG) is a regional organisation of Councils that advances sustainable management of Sydney's urban coastal and estuarine environment. We currently comprise nine member Councils who represent 1.3 million Sydneysiders.

The Parramatta River Catchment Group (PRCG) is a regional organisation representing nine member councils, government agencies and community groups. Together we are working to revitalise the Parramatta River. In October 2018, we launched DUBA, BUDU, BARRA: Ten Steps to a Living River - The Parramatta River Masterplan. This Masterplan details the steps required to make the Parramatta River swimmable again by 2025.

Together, the SCCG and PRCG is driving the delivery of a Greater Sydney Harbour Catchment Management Plan (CMP) under the *Coastal Management Act 2016*. The CMP will have a focus on improving waterway health in the catchment and seeks to ensure long-term actions are delivered by a range of stakeholders who have responsibility for the catchment's policy setting, management and monitoring. This catchment-wide CMP is likely to involve twenty-one Councils and multiple state agencies including Department of Infrastructure and Planning, Transport for NSW and Sydney Water.

It is therefore vital that the review of the *Greater Metropolitan Region Unregulated River WSP* considers the development of the CMP.

Water Sharing Plans are developed under the *NSW Water Management Act 2000 (WM Act)*. Many of the objects of this Act align with the objects of the *Coastal Management Act 2016* and are particularly relevant to a waterway health focussed CMP including:

- (c) to recognise and foster the significant social and economic benefits to the State that result from the sustainable and efficient use of water
- (d) to recognise the role of the community, as a partner with government, in resolving issues relating to the management of water sources
- (f) to integrate the management of water sources with the management of other aspects of the environment, including the land, its soil, its native vegetation and its native fauna
- (g) to encourage the sharing of responsibility for the sustainable and efficient use of water between the Government and water users.
- (h) to encourage best practice in the management and use of water.

Given the alignment of objectives, we believe that the review of the *Greater Metropolitan Region Unregulated River WSP* presents an important opportunity to strengthen,

complement and support the Greater Sydney Harbour CMP and other CMPs being developed in the Sydney basin.

We therefore recommend that the review of the *Greater Metropolitan Region Unregulated River WSP* considers the following:

1. Greater promotion of stormwater harvesting

It is noted that WSP may be amended to include rules around stormwater harvesting. We believe that stormwater harvesting should be highly promoted given the benefits to both water conservation and water quality. Some of our Councils currently harvest stormwater and use it to manage their assets such as parks and gardens. Capturing stormwater also has many benefits to water quality as stormwater often carries with it pollutants it comes in contact with such as roofs, roads and sometimes sewer systems.

2. Providing opportunities for enhance market-based trading.

We recommend including a mechanism to fund water quality improvement initiatives such as water sensitive urban design (WSUD), and bank stabilisation and naturalisation works. These types of initiatives have these ability to improve waterway health in the catchment. WSUD such as rain water tanks on private dwellings can also greatly reduce the amount of public water required to service individual households.

3. Accurately reflecting expected population growth in the Sydney basin and the impacts this will have on water use and water quality.

Currently, the Greater Sydney Harbour catchment is home to 3.07 million people and this is projected to increase to 4.35 million by 2041. These population figures need to be considered carefully in the review of the WSP as these significant increases are likely to lead to a degradation of water quality and significant demand on public water unless appropriately managed and new policy settings are developed.

4. Adapting to a changing climate and the likely impacts this will have on waterway health

The WSP needs to ensure it remains adaptable given the likely impacts of climate change such as change in the frequency of rainfall, sea level rise and increased urban heat. It needs to consider the latest information on climate change such as data sources from the NSW Government's AdaptNSW. It should also adopt a precautionary approach when developing new policy or changing management approaches.

5. Including an environmental monitoring and reporting framework (EMFR) that links with other NSW Government monitoring work

To measure and evaluate the success of the WSP, an appropriate EMFR needs to be developed. To be effective, efficient and consistent, it should also align and link with other monitoring work currently being done across government. These include:

- The Marine Integrated Monitoring Program being developed by the Marine Estate Management Authority
- NSW Beachwatch Program run by the DPIE which measures water quality at popular swimming locations

- Monitoring work being developed by Councils as part of the development of their CMPs.

If you have any queries, please contact Sarah Joyce

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Yours sincerely,



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