

# Response to the Natural Resource Commission on the review of the Lachlan Regulated River Water Source 2016

23 February 2025



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Natural Resource Commission  
GPO Box 5341,  
Sydney, NSW 2001

Via email: [nrc@nrc.nsw.gov.au](mailto:nrc@nrc.nsw.gov.au)

To whom it may concern,

**Re: Review of the Water Sharing Plans for the Lachlan Regulated River Water Source 2016**

Central NSW Joint Organisation (CNSWJO) speaks with a unified voice for its collective priorities. This region has a proud history of working collaboratively, representing over 180,000 people covering an area of more than 53,000sq kms comprising the local government areas of its membership - Bathurst, Blayney, Cabonne, Cowra, Forbes, Lachlan, Lithgow, Oberon, Orange, Parkes, Weddin. Central Tablelands Water County Council is an associate member.

Tasked with intergovernmental cooperation, leadership and prioritisation, CNSWJO has consulted with its stakeholders to identify key strategic regional priorities. The CNSWJO Strategic Plan can be found here - [www.centraljo.nsw.gov.au](http://www.centraljo.nsw.gov.au).

CNSWJO member councils all operate local water utilities (LWUs), so the security, availability and affordability of town water supplies for the communities in Central NSW is core business for the councils in this region and a priority for the CNSWJO Board.

Following extensive work by the CNSWJO and its members with the NSW Department of Climate Change, Energy the Environment -Water (DCCEEW) on the development of the Lachlan Regional Water Strategy we welcome this opportunity to provide feedback on the Water Sharing Plan for the Lachlan Regulated River Water Source 2016.

It is understood that the review is a statutory requirement under Section 43A of the Water Management Act 2000 and will focus on the extent to which the water sharing provisions in the plan have materially contributed to the achievement of, or the failure to achieve, environmental, social and economic outcomes. It will also identify whether changes to plan provisions are warranted.

Where CNSWJO member councils may provide separate more detailed submissions based on local issues, this response provides regional feedback based on CNSWJO Board endorsed policy on the effectiveness of the Water Sharing Plans with respect to town water and its productive use.

We reference a previous submission to the NRC for the review of the Water Sharing Plan for the Lachlan Unregulated River in 2022 [220523 CNSWJO Submission Water Sharing Plans Lachlan FINAL](#). Where change is slow in the strategic water management space, we reiterate the following points.

*The Central NSW JO speaks for over 180,000 people covering an area of more than 53,000sq kms comprising of Bathurst, Blayney, Cabonne, Cowra, Forbes, Lachlan, Lithgow, Oberon, Orange, Parkes, and Weddin.*

A great deal of change has occurred over the past decade which relates to NSW Water Sharing Plans. CNSWJO believes that a thorough review is needed. This region seeks to codesign the approach to the review ensuring that the needs and aspirations of urban communities are well considered and the opportunities to do business differently, particularly in the Lachlan, are enabled. It is the view of this region that this has not been the case in the current Plans.

Arguably, the inception of Water Sharing Plans was at a time when rural and regional NSW was perceived as experiencing both population and production decline. Indeed, the current NSW Treasury Common Planning Assumptions are a testament to this outdated thinking and data. In fact, Central NSW continues to struggle with housing and skills shortages for its growing contribution to the state and national economies.

Recent modelling completed by the DCCEEW as part of the development of the Lachlan Regional Water Strategy and lived experience through a multi-year drought has highlighted areas where town water supply systems are at some risk under future climate conditions.

It has become evident through the development of the Regional Water Strategies for both the Lachlan and the Macquarie-Castlereagh catchments, that assumptions made by agencies about the social and productive value of town water are not in line with the region's lived experience. The challenges for many of our towns through the 2017-2020 drought are a testimony to the failure of existing systems including the Water Sharing Plans. More detail is available on request.

It remains the view of the Central NSWJO Board that there is plenty of water in this region and the opportunity is for more efficient and effective use of available water to modernise and sustain the region's economy and livability.

The Water Sharing Plan for the Lachlan Regulated River Water Sources 2016 requires review for the following reasons:

- Learnings from the drought of record including:
  - the need for better linkages between town water restrictions and access to water for human consumption within the Plans.
  - recognition of the existing extent and potential for urban communities to share water including existing and planned infrastructure.
  - the need for a Critical Water Needs Act as existing systems were not able to cope; and
  - the enablement of storm water harvesting and other contemporary approaches to water security for urban communities.
- Incorporation of the learnings from the Regional Water Strategies including the value of productive water and the potential for regional solutions for urban water security.
- Alignment with other key State and Federal aspirations particularly the water needs of:
  - The Parkes Special Activation Precinct
  - Critical minerals
  - Contemporary developments in alternative energy relating to water e.g. hydrogen and pumped hydro
  - Modern, including protected, agriculture
  - Regional Water Strategies
  - Manufacturing and food independence as a result of Covid and international instability.
- Alignment with priority in the Water Management Act 2000 where water for human consumption is not sufficiently enabled in the Plans.

- Greater knowledge of the impacts of climate change where we now know that there will be increasingly serious droughts **and** floods and water sharing needs to optimise outcomes from both.
- Good practice where the data sources and other information relied on in the current plan are a decade out of date; and
- The opportunities afforded for using water differently.

### **Change to enable town water security in the Lachlan**

Councils in the catchment continue to plan and implement innovative solutions to improve water security including in demand management initiatives. There are cases where these efforts are being prevented or inhibited by the current Water Sharing Plans as follows:

- Access to additional entitlement and conversion of this entitlement to town water supply use;
- Water trading restrictions; and
- The need to seek additional approvals during times of critical drought.

While water for human consumption is recognised as of the highest priority for the WaterNSW dam network, there continues to be challenges in delivering water to towns and communities in times of drought. While slow progress is being made in identifying options to secure town water supplies in the Lachlan Regional Water Strategy, the big issues around water sharing and dam management need to be addressed including in the Water Sharing Plans.

As it currently stands, irrigation is a greater water user in droughts than towns where much of the heavy lifting in terms of water efficiency has had to be undertaken.

### **Change to enable stormwater harvesting and other innovations**

Given the 10-year duration of the plan and once in 10-year opportunity to make submissions on changes, the Water Sharing Plan needs to allow for innovations such as stormwater harvesting and other water security improvements to be specifically recognised and enabled.

Under the existing Water Sharing Plans not enough use is made of water credits. Stormwater harvesting and other recycling and reuse innovations provide an opportunity for the additional flow volume created by urban development, in a local sense, to be treated like a water credit with the excess water above natural flow available for capture and reuse. This is a concept that should be reflected in the review of the Water Sharing Plans, like treated effluent discharge.

A return flows policy has been investigated by the NSW DCCEEW for some time and needs to be progressed. The Water Sharing Plan should cater for water credits when water is returned to the river.

### **Changes that enable a swifter response during drought for water for critical human needs**

There continues to be a need for better policy and protocols to underpin the Water Management Act 2000 in a new climate future to ensure water for critical human needs are met as the highest priority. This includes linking town water restrictions to the environment and other users.

We reiterate that the key questions that need to be addressed through a review of the Water Sharing Plans are:

- What's the definition of critical human needs?
- When there isn't any water, how is a high security allocation for a town supply implemented on the ground?

- What are the triggers and policy settings to ensure the basic human right for drinking water are met?
- What are the implications of secure yield modelling for Water Sharing Plans and environmental flows on town water supplies?

Water for critical human needs should have the highest priority in the Water Sharing Plans. Currently Councils are required to seek additional or special approvals to access additional water. This was experienced during the 2017-2020 drought and critical time frames could be reduced if suitable mechanisms existed in the Water Sharing Plans to prioritise town water supply.

There needs to be significant changes to the way water is managed for inland regional towns not only in times of emergency.

### **Change to enable innovation in the Lachlan such as the Parkes Special Activation Precinct and the Dutch Model**

A potential review of the Lachlan Regulated River Sources Water Sharing Plan presents the opportunity to ensure policy and water management settings are right to not only solve long-term water security for urban communities, but to drive growth and prosperity by delivering better flood immunity and water security to enable the agricultural sector.

Together with the Lachlan Regional Water Strategy and review of the Lachlan Water Sharing Plan there is potential to consider, not just urban water, but water for productive uses including manufacturing and business, agriculture and mining in a whole of catchment approach. This includes the opportunity in the Lachlan for the creation of more high security entitlements to enable higher value uses of water. This is not about increasing water usage above the Water Sharing Plan Limit but improving security and reliability and allowing usage to reach the Plan Limit.

By reviewing and changing how water security is managed in the Lachlan Valley and increasing the proportion of water allocated as high security water, this will in turn push the value of water up, having guaranteed allocation leading to an increased investment in capital infrastructure and more water efficient crops. By managing the river water effectively, it will also lead to less pressure on the ground water aquifer and potentially lead to more water for the environment.

### **Conclusion**

In reviewing the Water Sharing Plans, we urge the NRC to recognise the economic benefits of regional town water as a critical and essential component of the NSW economy. Regional towns provide essential support for agribusiness, mining, tourism, and sustain other essential services such as health, social care and education. Having access to secure, quality affordable water is critical for the economic vitality of urban and rural towns particularly so they can continue to thrive in the face of population growth and climate change.

It's time to challenge the way we have always done things and to think about how we may be able to learn from countries such as the Netherlands and create additional value from the water in the Lachlan Valley whilst implementing sustainable water management policies.

In summary, this region does not seek to provide answers to the challenges. Instead, it is seeking for there to be a complete review of the Plan where the CNSWJO offers to provide support in coordination in a codesigned process.

We welcome the opportunity to continue the conversation about how water is valued for our urban communities and to add rigor and confidence to the great work that has been done in this space so far.

For further advice or to discuss any matters raised in this response please do not hesitate to contact me on [REDACTED] or email me on [REDACTED]

Yours sincerely,

[REDACTED]

[REDACTED]

**Executive Officer**  
Central NSW Joint Organisation (CNSWJO)