

**From:** [REDACTED]  
**Sent:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** Your submission for Far North Coast Regional Water Strategy

### 1. Information on confidentiality and privacy

I give my permission for my submission to be publicly available on the NSW Department of Planning, Industry and Environment website.: Yes

I would like my personal details to be kept confidential.: No

### 2. Your details

Email address: [REDACTED]

Name: Graham Kennett

Address: [REDACTED]

Contact phone number: [REDACTED]

Do you identify as an Aboriginal person?: No

Are you an individual or representing an organisation?: Organisation

### 3. Organisation or business details

Who do you represent?: Local Water Utility

If you selected Government, please clarify.: Local

If you selected Peak representative organisation, please clarify.:

### 4. Draft Regional Water Strategy objectives and vision

Do you support this vision for the Far North Coast Regional Water Strategy? : Yes

If no, please outline your vision for the long term management of water resources in this region?:

### 5. Information and modelling used to develop the Far North Coast Regional Water Strategy

Do you have any comments about the information used to develop this strategy?: Information used seems to reflect best currently available.

Please provide details if there is additional information you think we should consider?:

### 6. Stochastic modelling method

Do you have any comments about the modelling method used to develop this strategy?: No issues.

Is there any additional information that you believe could help us assess the benefits and

disadvantages  
of draft  
options?:

## 7. Opportunities and challenges for water management in the Far North Coast region

Do you have  
any comments  
on the  
opportunities,  
risks and  
challenges  
identified?:

Appear appropriate.

Are there any  
additional  
opportunities,  
risks and  
challenges that  
we should  
consider and  
what options  
could address  
these?:

## 8. Draft Far North Coast Regional Water Strategy options

Which five (5)  
options do you  
think are most  
important?:

20. Raise Toonumbar Dam level 15. Address auditor general recommendations for strategic planning to support local water utilities 32. River Recovery Program 31. Northern Rivers Watershed 6. Remove impediments to water reuse projects

Please  
comment on  
why you think  
these options  
are most  
important? :

The opportunity that Toonumbar Dam presents if raised is critical to the Kyogle LGA. The regulatory environment that LWUs operate in is unnecessarily complex, onerous, and lacks a whole of government strategy, and is an impediment to innovation and opportunities such as reuse and recycling and provision of new water supply and sewerage schemes to service villages currently without centralised systems. There is a need to repair and restore the riparian corridors, and the Richmond Watershed Initiative provides a long term improvement to mitigate against many adverse impacts on the river system, the surrounding ecosystems, and communities in the region.

Which five (5)  
options do you  
think are least  
important? (If  
any):

Please  
comment on  
why you think  
these options  
are least  
important? :

Do you have  
any comments  
on the draft  
options?:

An additional option has been proposed by ROUS County Council that would see the preparation of a regional flood model and characterisation of the flooding across the catchment. This initiative would be strongly supported by Kyogle Council, and would help to prioritise restoration within the catchment as well as provide economic impact assessments that could be used in the evaluation of possible mitigation projects and the overall Richmond Watershed Initiative.

## 9. Option combinations

Do you have  
any thoughts  
on how the  
options could  
be combined  
with other  
options?:

The main aspect of the combination of options is around the timing of delivery as there could be significant benefits gained by implementing options in parallel, as well as in sequence over the coming decades. For too long the main town water and regulated systems in the region have gone without augmentation, while the various bodies have procrastinated without commitment to long term solutions. Demand management has been effective in delaying the critical point where demand exceeds supply, however there is only so much that demand management can do. The point in time where demand exceeds supply is getting dangerously close to the time taken to deliver options such as new dams. The best long term outcome would be achieved by combining raising Toonumbar and Clarrie Hall Dams, and building Dunoos Dam as soon as possible, then advance the future inter-connection of Tweed/Rous and the smaller supplies where feasible, and possibly even SEQ. Then look at desalination for improved resilience and emergency supply either from a centralised plant in the Northern Rivers, or the existing plant in SEQ. All of these options run in parallel to the restoration of the natural waterways to improve the overall river health, and eventually improve the secure yield of the surface water and groundwater extractions across the region through improved/restored natural retention and recharge of water within these systems.

Are there  
additional  
options that we  
should  
consider?:

## 10. Other comments

Do you have  
any other  
comments  
about the Far  
North Coast  
Regional Water  
Strategy?:

The strategy does not include the unserved areas that are currently under stress due to on-site sewerage systems or a heavy reliance on rainwater tanks to provide water supplies. For the Kyogle LGA the key priorities are a water supply for the village of Tabulam, and sewerage systems for the villages of Tabulam, Wiangaree and Mallanganee. The existing Urbenville Muli Muli Woodenbong water supply is also omitted from the strategy (refer Table 4) and this supply has a Medium to High water security risk. Part of the issue here is not including the significant section of the Kyogle LGA that is actually part of the Clarence River catchment, rather than the Richmond, Tweed and Brunswick which are the focus of the strategy. This means that the strategy has some shortfalls for those LGAs that also include areas from other catchments, such as Kyogle and Richmond Valley. There is also a need to consider the additional residential demand that occurs during serious drought when those people in rural areas that would normally rely on rainwater tanks, suddenly become customers of the town water supply systems through water carters, when their tanks are empty due to the lack of rainfall. This places serious additional stress and reduced security of supply for the town water systems, and there is often a political reluctance to cut off these rural water carters during severe drought, which in turn impacts on the actual customers of the water supplies, who have been paying for the infrastructure that is being used to supply this unplanned demand.

## 11. Referral

How did you  
hear about the  
public  
exhibition of  
this strategy?:

Department of Planning, Industry and Environment