

Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Sir/Madam

DRAFT NAMOI REGIONAL WATER STRATEGY

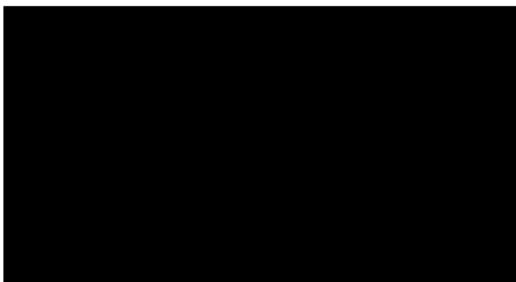
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On behalf of Tamworth Regional Council thank you for the opportunity to provide comments on the Draft Namoi Regional Water Strategy.

Council's submission follows.

Please contact the undersigned should you wish to discuss this matter further.

Yours faithfully,





Tamworth Regional Council

**Response to the NSW Department of Planning, Industry
and Environment**

Draft Namoi Regional Water Strategy

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Background

Tamworth Regional Council supplies potable water to 7 different communities within the Council area via 6 discrete water supply systems. These communities are

- Tamworth
- Moonbi/Kootingal
- Attunga
- Bendemeer
- Barraba
- Manilla
- Nundle

The table below details the water sources and entitlements available to Council from each of those sources for each centre.

Water Entitlements - Various Sources - ML's				
	Regulated River	Unregulated River	Groundwater - Alluvial	Groundwater - Fractured Rock
Tamworth, Moonbi, Kootingal	16400	5600	118	
Attunga			120	
Bendemeer		84		10
Barraba	365			180
Manilla	150	421		
Nundle			100	

Ove the past 20 years each of the communities have experienced drought leading to the imposition of severe water restrictions as shown below

Centre	Restrictions	Period
Tamworth	Level 5 – No outside use of water. Target consumption of 150 L/person per day	14/5/2007 to 24/8/2007 23/9/2019 to 31/8/2020
Barraba	Level 4 – No outside watering	20/1/20 to 6/4/2020
Manilla	Level 4 - No outside watering	20/1/20 to 6/4/2020
Nundle	Level 4 - No outside watering	4/2/03 to 4/3/03 28/1/19 to 13/4/20

Given the severity of restrictions and particularly how long Level 5 restrictions were in place in Tamworth during the most recent drought which saw Chaffey Dam, Council's main supply dam for Tamworth, Moonbi and Kootingal, reach a storage level of 12.85% (13,107 ML's), Council is very concerned about enhancing the future water security and reliability of raw water at all our centres, and particularly Tamworth.

Comments of the draft Strategy

With that as background it is advised the elected representatives of Tamworth Regional Council considered a report on the Draft Namoi Regional Water Strategy at the Council meeting of 23 March 2021 and resolved to make a submission, including the following comments, in relation to the draft strategy

- the NSW Government and DPIE are to be congratulated on the draft strategy, as it is the first comprehensive attempt to look at the issues involving water management in the Namoi and seek solutions;
- Council considers that the definitions for water security and reliability need to be the same when talking about water security from a regional water strategy and from an Integrated Water Cycle Management perspective. It is untenable for water security to be estimated based on different models which could yield different answers for the same centre;
- Given the size of Tamworth and the daily consumption, even at severe water restrictions levels, there is no alternative water supplies e.g. water carting, which can provide a water supply to residents in the event Tamworth ran out of water. On this basis, considering water security which allows for a centre to run out of water is not possible for a centre the size of Tamworth and future water security for certain centres must consider that the centre cannot be allowed to run out of water.
- for a growing centre, water security should not just be assessed based on present demand, but also into the future when growth will place further demand on supplies;
- Council supports the Dungowan Dam and Pipeline project as a key component in securing Tamworth and Moonbi/Kootingal's water supply into the future;
- Council agrees that much further work is required to better understand groundwater including the linkages between surface and alluvial water;
- Council believes groundwater users should contribute to the cost of the storage where one of the reasons for releasing water from the storage is for aquifer recharge;
- as part of the consideration of changes to present water sharing rules, consideration needs to be given to the lack of incentives for a centre to save water particularly if the driver for saving water is to enhance water security and to prevent water restrictions in the future. At present all water saved from a particular source is available to be sold to other customers. This approach provides no improvement in water security;
- Other changes to current water sharing rules include;
 - **Clause 48 – Minimum Daily Flow Rules - The Operator is required to ensure a minimum daily release of 3 ML is made from Chaffey Dam...**

Council supports making water available for the environment, however the present 3ML per day releases from Chaffey Dam, regardless of downstream conditions, should be reconsidered. Council has previously suggested the 3ML per day release could be stored in the dam and released as part of a block release which will ensure sufficient water is released to address any environmental concerns identified .

Council also believes releases should stop when the dam storage falls to a certain level.

- **Clause 52 – Maintenance of Water Supply – the lowest period of accumulated inflows is listed as prior to 1 July 2010**

Council believes the period should be changed to ensure the drought of record is incorporated in this consideration.

Whilst it is acknowledged that this may lead to a reduction in predicted inflows and therefore reductions in annual Available Water Determinations, it is also reflecting the reality of the situation and to exclude the most recent and future droughts from future inflow modelling cannot be justified.

- **Division 5 – Available Water Determinations (AWD)**

The present Water Sharing Plan (WSP) is supposed to detail the rules relating to how water is shared in the Peel/Namoi Valley. Council does not believe the WSP contains enough detail in relation to just how this will be done, in particular around the assessment of AWD.

Council staff have been in discussion with DPIE staff in relation to the calculation of AWD in the Peel Valley and the process is as follows;

1. In April/May each year – the volume of water left in the storage in Chaffey Dam is identified

The volume in 1 is then reduced by

2. 100% of Town Water Supply entitlement in year 1 and 70% in year 2
3. Allowance for stock and domestic
4. Allowance for Basic Land Holder rights
5. Allowance for minimum releases
6. Other high security entitlements
7. An allowance for instream losses and operating losses

Then increased by

8. An allowance for inflow over the next 12 months
9. An allowance for Dungowan Dam above 50%
10. What is left is then used to calculate the AWD for general security

It is clear the current WSP;

- Does not detail Town Water Utilities receiving 100% of their entitlement in year 1 and 70% in year 2 – there is no mention of year 2 at all
- Does not detail how High Security entitlements are handled during the assessment
- Does not detail how operating and other losses are included and handled in the assessment
- Does not mention inflow considerations
- Does not mention consideration of the level of Council's Dungowan Dam

Council would like the process followed to establish an AWD to be fully detailed in the WSP such that all license holders in a valley know how the AWD is calculated, rather than the current perception that the AWD assessment comes out of some black box following wide interpretation of any requirements.

- **Change the WSP to allow the provision of 100% of Council's entitlement in year 2 and 100% of Council's entitlement in year 2 during the AWD process.**

- **Chaffey Dam Pipeline**

Under rules set by the NSW Government, and in place until 31 November 2021, the new Chaffey Dam pipeline can only be operated when the storage level in Chaffey Dam is less than 20%

Council's position is that the most appropriate operating regime for the pipeline, long term, is operation at all times with water only released into the Peel River from Chaffey Dam for Council's purposes, when the demand for water in Tamworth/Moonbi/Kootingal is above the capacity of the pipeline to supply. Further, water that would otherwise have been lost during delivery of that water via the Peel River to Council's extraction point at the Peel River Pump Station, should be stored in Chaffey Dam to increase the security of supply for Tamworth/Moonbi/Kootingal.

- the Peel Valley is relatively unique when considering the percentage of entitlement from Chaffey Dam held for town water. As a result, there may need to be solutions developed that are unique to the Peel Valley;
- at Split Rock Dam during the most recent drought, the excessive losses experienced to get water to Manilla, given the relatively small volumes of water required, suggests that the 13GL cut off was insufficient to ensure ongoing water supply and this amount should therefore be reconsidered;
- Council supports the investigation and roll out of recycled water options, but the issue of what to do with the wastewater from the treatment systems presently available is a considerable deterrent for inland centres, and the strategy should include further research into the treatment processes available for recycled water;
- Option 11, which suggests the creation of a critical human needs water license, needs careful consideration because in Tamworth, where approximately 50% of the water used for commercial purposes is used by 3 abattoirs, Council is concerned that
 - people may have water to drink, but no job, because their employer has been closed down;
 - the closure of businesses such as the abattoir will significantly affect the supply of beef, lamb, and chicken in NSW; and
 - once a business is closed it may never reopen. Will incentives be provided to encourage business to reopen when the drought is passed.

Flow on effects such as these must be considered when reserving water for critical human needs only.

- Option 38, the voluntary conversion of licenses, should include investigation of the buyback of sleeper licenses in the Peel and if that were undertaken, what, if any, benefits that would produce in terms of increased water security.