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Subject: Macquarie-Castlereagh RWS Submission Warrumbungle Shire Council

Dear Regional Water Strategy Team,

Please find below Warrumbungle Shire Council's submission on the Macquarie-Castlereagh RWS.

Unfortunately, the provided submission form did not provide sufficient space for our comments, therefore I have enclosed those in the email body.

WARRUMBUNGLE SHIRE COUNCIL SUBMISSION TO MACQUARIE-CASTLEREAGH REGIONAL WATER STRATEGY

Council welcomes the opportunity to comment on the Draft Macquarie-Castlereagh Regional Water Strategy.

Issues

Improving Water Security in the Upper Castlereagh and Talbragar River Systems

Option 4 of the Long list of options states:

Improving town water security in the upper Macquarie unregulated river system Conduct a feasibility study to identify options to improve water security for towns that rely on water from the upper Macquarie (unregulated) system, including Bathurst, Orange, Oberon and Lithgow. The study would identify water security deficiencies, potential water sources, delivery mechanisms and preferred options for further development.

Council believes a similar feasibility should also be included for towns that rely on water from the upper Castlereagh and Talbragar Rivers. This would ensure that the Strategy is all-encompassing, addressing issues of a similar nature across all parts of the Macquarie-Castlereagh Catchment.

Apart from Timor Dam located at the very top of the Castlereagh catchment, there are no major water storages in the upper reaches of the Castlereagh and Talbragar rivers. As a result, river flows can be highly variable and riverbeds often dry. This area includes the towns of Coonabarabran, Coolah, Dunedoo, Mendooran and Binnaway, with the majority of these centres experiencing major water supply and security issues in recent droughts. While groundwater supplies also exist in most of these towns, there are issues with groundwater quality as well as limitations on extractions.

In particular the issues for Warrumbungle Shire Council include:
- Currently insufficient groundwater allocation for Coonabarabran, not in line with the now 11 bores and \$2.2M groundwater pipeline project; Council assumes that an application for an

increase in allocation will be granted following the finalisation of the hydrogeological study/groundwater management plan.

- Mendooran and Dunedoo town water source security appears impacted and threatened by local irrigators and other users (such as RMS); despite these concerns and sustained Council objection, approval has recently been given to the installation of another irrigation bore near Dunedoo. - Mendooran and Binnaway, Council's unsewered townships, suffer from groundwater contamination, rendering the use of back-up bores partially impossible. - Binnaway and Coonabarabran surface water extraction cannot at all times comply with current Water Access Licence requirements with regard to environmental flows.

The Macquarie-Castlereagh Regional Water Strategy needs to recognise that almost all towns in the upper reaches of the Macquarie-Castlereagh catchment are experiencing similar issues in relation to water security, and therefore all of these centres should also be given the same level of consideration when looking at options for improved water security. The challenges faced by smaller centres is often more significant due to ageing water supply infrastructure and limited financial capacity for these centres to afford the costs of expansion and/or upgrading.

Therefore, as provided in option 4, Improving town water security in the upper Macquarie unregulated river system, the strategy should also consider a similar option

Improving town water security in the upper Castlereagh and Talbragar river system

Conduct a feasibility study to identify options to improve water security for towns that rely on water from the upper Castlereagh and Talbragar systems, including Coonabarabran, Coolah, Dunedoo, Mendooran and Binnaway. The study would identify water security deficiencies, potential water sources, delivery mechanisms and preferred options for further development.

Groundwater Management

Council supports the options included in the long list relating to groundwater, including options 13 and 39 but specifically options 25, 26, 27 and 28.

Groundwater plays a major role in the supply of water to virtually all towns and villages in Warrumbungle Shire. It is critical that these supplies are effectively managed to ensure long term water security for the urban centres relying on this water. The Strategy needs to ensure issues relating to access to this water, as well as protecting these supplies from contamination, such as from activities related to coal seam gas extraction/fracking, or over-extraction, is well understood. There needs to be a high level of collaboration between NSW agencies responsible for the management of these groundwater supplies and Council as a key user of this water. This can only be achieved with a greater level of understanding about how these

groundwater system actually work and what the key threats to their long term sustainability are, with this knowledge shared between Council and these agencies to enable sustainable groundwater management plans to be developed and implemented.

Current issues Council faces include:

- Secure Yield modelling for groundwater supplies, required for Council's Integrated Water Cycle Management Strategy.
- Development of water sourcing policies, where multiple sources are available and using available Secure Yield modelling results, to ensure optimal yield while considering downstream supply system, for example in the case of Coonabarabran, Binnaway and Mendooran.
- Determination of adequately updated town water restriction triggers as part of Council's Drought Management Plan.

Ongoing Management of Key Water Infrastructure in Rural NSW

The strategy outlines in Section 3.3 p 103

Other important considerations when we arrive at shortlisted options will be who owns and maintains infrastructure options, who benefits from the option, what the impacts are and how to pay for the option: for example, should the cost be recovered from water users and what can be funded by the Australian or NSW Governments?

A key consideration for any major infrastructure option which benefits LWUs will be how the ongoing operational and renewal costs of this infrastructure is dealt with.

This is particularly relevant for Warrumbungle Shire Council, where there are numerous individual water supply systems servicing small, isolated communities. Currently, there are ten supply systems across the Local Government Area, including two non-potable supplies. Many of these towns and villages have stagnant or declining populations as well as old water supply infrastructure which needs to be renewed. At the same time, Council is required to comply with the same regulatory issues as well-resourced major water utilities, while constantly battling to attract and retain skilled staff with the necessary expertise to ensure Council continues to meet its key water supply obligations, especially in regard to reliability and water quality

The ongoing cost of operating these water supply systems, as well as ensuring ongoing renewal of key assets, is a significant and ongoing challenge for Council. There is limited scope to increase water charges to cover these costs, as many communities simply do not have the capacity to pay, due to limited household incomes and declining, aging populations.

The Strategy needs to address this situation, by engaging effectively with these communities to fully understand these challenges and explore sustainable solutions. There needs to be open and broad ranging discussions held with these communities so that a realistic understanding of the issues can be gained, and solutions developed in a

collaborative manner. This process also requires both the NSW and Australian Government to take an open minded approach to the potential solutions which may be identified, recognising the very real challenges which many rural communities face and being prepared to examine new ways of ensuring these communities can remain viable in the long term.

Regards,

[REDACTED]

Warrumbungle Shire Council

[REDACTED]

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