

How the department has responded to the Natural Resources Commission Review Recommendations for the Water Sharing Plan for the Greater Metropolitan Region Groundwater Sources 2011

This document outlines how the department has responded to the independent review of the *Water Sharing Plan for the Greater Metropolitan Region Groundwater Sources 2011* under S43A of the *Water Management Act 2000*.

Water sharing plans are statutory instruments under the *Water Management Act 2000* (the WM Act). They prescribe how water is managed to support sustainable environmental, social, cultural and economic outcomes. They intend to provide certainty regarding rules for water sharing for water users over the life of the water sharing plan, which is typically 10 years, unless it is extended.

The *Water Sharing Plan for the Greater Metropolitan Region Groundwater Sources 2011* (the plan) commenced on 1 July 2011 and was due to expire in July 2021.

The Natural Resources Commission (NRC) has a role under Section 43A of the WM Act to review water sharing plans within five years of expiry and report to the Minister on:

- the extent that the plan's water sharing provisions have materially contributed to the achievement of, or failure to achieve, environmental, social and economic outcomes
- if changes to plan provisions are warranted.

The [final review report](#) is available on the NRCs website.

The NRC may recommend extending or replacing the plans depending on its review findings. In this instance the NRC recommended the replacement of the plan by no later than 30 June 2023.

Tables 1 and 2 below outline the recommendation and suggested actions arising from the NRC review and the status of the response to these actions by the Department of Planning and Environment – Water (the department).

The Greater Metropolitan Region Groundwater and the Greater Metropolitan Region Unregulated River water sharing plans were reviewed in the same document. The recommendations and suggested actions in Table 1 and Table 2 are relevant to the groundwater plan (the replaced plan) only.

Table 1. Department response to NRC review recommendations

The Natural Resources Commission recommended (February 2021)	Action taken against NRC recommendation (November 2022)
<p>1 Overall</p> <p>That this plan is:</p> <ul style="list-style-type: none"> a) extended for a further two years until 30 June 2023, to allow time to complete data collection, analysis and modelling b) Replaced by 1 July 2023 supported by the completion of the recommendations of this review. The replacement process should ensure the plans consider the draft Greater Sydney Water Strategy (GSWS) to ensure water management is integrated across the region. 	<p>Closed.</p> <p>The plan will be replaced by 1 July 2023.</p> <p>The department has considered the GSWS drought supply target (30GL/yr) in the risk assessment for informing the long-term average annual extraction limits to ensure adequate provision to enable licence and account operation.</p>
<p>2 Managing extraction volumes</p> <p>To inform the replacement plan by 1 July 2023, the department should develop a comprehensive water balance. This should be developed using an overarching modelling framework, which includes:</p> <ul style="list-style-type: none"> a) reviewing and addressing gaps in current modelling and model inputs b) all surface water and groundwater extraction c) inflows (including treated wastewater and recycled water discharges) and induced recharge (internal and external to the plans) d) up to date evidence regarding recharge, hydrogeology, connectivity, and climate (the hydrological model should use the climatic data developed for the draft Greater Sydney Water Strategy). 	<p>Closed.</p> <p>A comprehensive water balance model is not feasible in the Greater Metropolitan Groundwater Sources due to limited data availability in these groundwater sources.</p> <p>Up to date information on rainfall, hydrogeology and climatic projections were used to review recharge estimates. Rainfall recharge estimates were revised after incorporating expanded rainfall data (up to 2019 rather than 2006) and applying infiltration rates based on surface geologies across the water source rather than the dominant geology.</p> <p>The climatic data developed for the draft Greater Sydney Water Strategy is less reliable at the water sharing plans shorter-term scale. While the long-term data indicated greater average rainfall, the lower, historic average was used for the water sharing plan as a precautionary approach.</p> <p>To determine the plan long-term average annual extraction limits, the department assessed environmental and socio-economic risks, taking into account the rainfall recharge, distribution of groundwater-dependent ecosystems and estimates of current and future extraction in each of the water sources.</p>

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<p>The modelling framework should be used to inform revised provisions and assess their ability to achieve outcomes.</p>	
<p>3 Managing extraction volumes</p> <p>By 1 July 2023, the department should ensure all extraction in the Greater Metropolitan region is managed to protect, preserve and maintain the water sources, aquifer integrity and dependant ecosystems by:</p> <ul style="list-style-type: none"> a) using the modelling framework to establish and publish numeric values for comparable, catchment-scale LTAAELs for the Surface Water and Groundwater Plans that include all forms of extraction managed under the plans b) using the modelling framework to ensure the Surface Water and Groundwater Plans can function, protect values and achieve objectives under a representative range of climatic conditions over the medium to long term c) basing LTAAELs on sound evidence of ecosystem requirements, recharge, hydrogeological boundaries, and connectivity d) ensure mining activities are licenced e) including an amendment provision allowing LTAAELs and Available Water Determinations (AWDs) to be adjusted should volumes managed external to the plans change significantly. 	<p>Closed.</p> <p>Groundwater extraction limits are expressed as an annual volume of water (ML/year) that can be extracted on average over the long-term. While the total amount extracted by all water users varies each year, on average it cannot exceed the extraction limits.</p> <p>The department used a risk-based assessment to determine extraction limits and considered:</p> <ul style="list-style-type: none"> a) Estimates of all forms of current and anticipated extraction in each groundwater source. including basic landholder rights, aquifer access licences and licence-exempt take. b) Climate change over the life of the replaced plan - adopting the historical average rainfall. c) Best available evidence of hydrogeological boundaries and ecosystem requirements was sourced to revise plan provisions to maintain aquifer integrity and protect ecosystems. Additional groundwater-dependent ecosystems were identified and considered in the risk assessment that informed the LTAAEL. The LTAAEL is not the primary tool to manage ecosystem requirements which are dependent on local availability, rather than long term average across a water source. The replaced plan also manages risks to high priority groundwater-dependant ecosystems (GDEs) by restricting how close works can be to them. d) Licensing take is an implementation issue not a water sharing plan matter. Both licensed and exempt take was considered in risk assessment. e) The replaced plan includes a provision allowing extraction limits to be modified.

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4	<p>Managing extraction equitably</p> <p>By 1 July 2023, DPE-Water should ensure the plans facilitate equitable sharing of water by clearly defining equity objectives consistent with the Act’s requirements.</p>	<p>Closed.</p> <p>All water sharing plan provisions consider the water sharing principles and objects of the <i>Water Management Act 2000</i>. This recommendation has been addressed with improved drafting of objectives, strategies and performance indicators.</p>
6	<p>Limiting timing of extraction to protect flows and manage drought</p> <p>By 1 July 2023, the department should review all exemptions and simplify daily access rules in the Surface Water Plan and connected Groundwater Plan water sources to minimise the time and volume of exempt extraction.</p>	<p>Ongoing.</p> <p>As access rules are linked, simplifying groundwater access rules is addressed by simplifying access rules and removing some exemptions in the surface water plan.</p> <p>Many of the areas where changes to exemptions were proposed were affected by flooding. Consultation on proposed changes to simplify these rules were postponed. Consultation on the rule changes is proposed within the first five years of the plan. Plan amendment will enable any changes.</p>
8	<p>Limiting timing of extraction to protect flows and manage drought</p> <p>By 1 July 2023, the department should ensure that, if licensees are unable to comply with access licences at any time, extraction is appropriately mitigated, including:</p> <ul style="list-style-type: none"> a) amend Clause 57(3) parts (a) and (b) of the Surface Water Plan on planned environmental water, which allow for cease to pump exemptions for aquifer interference activities that are either approved by the Environment, Planning and Assessment Act 1979 or the Minister, to require 100 percent mitigation of any exemptions b) link Groundwater Plan daily access exemption provisions to Surface Water Plan provisions where appropriate and consider including mitigation requirements 	<p>Closed.</p> <p>S60I/ 60A of the WMA requires a licence to be held for any water taken during mining activity. Mines are unable to cease taking during CTP times, but their take is measured or estimated and reported via their development consent conditions including site water management plans. Mitigation and reporting of take daily is not practical but mitigation can occur on a longer time scale and would be a condition of their development consent.</p> <p>Smaller aquifer interference activities do not always require an approval.</p> <p>The replaced plan includes an amendment provision to add or modify provisions relating to the management of aquifer interference activities including the granting of aquifer interference approvals.</p>

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<p>c) in the Surface and Groundwater Plans, account for mitigation daily (the timescale at which cease to pump rules operate).</p>	
<p>9 Limiting timing of extraction to protect flows and manage drought</p> <p>By 1 July 2023, the department should:</p> <ul style="list-style-type: none"> a) estimate extraction each year to ensure compliance with LTAAELs to determine if adjustments are necessary b) include rules following the department’s consideration of how AWDs can be used to manage extraction during drought, including under predicted climate change c) examine and simplify the combined role of the AWDs and carryover activities. 	<p>Ongoing.</p> <ul style="list-style-type: none"> a) Extraction figures will be available once the NSW Non Urban Metering Framework is implemented in the Greater Metropolitan region. b) Available water determinations in localised areas or an entire groundwater source can be reduced if extraction is impacting on the groundwater source. This is enacted under s324 of the Act. <p>The appropriateness of access rules has been considered based on the longest record of flow available including the most recent 2019/20 drought. Plans operate for 10 years at which time they may be reviewed.</p> <p>The department will work toward priorities in the State Water Strategy. Priority 4 of the State Water Strategy is to increase resilience to changes in water availability (variability and climate change). The 2021/22 action plan looks to improve and apply our understanding of climate variability and change. Including work to determine a methodology and progressively incorporate climate risk data into water sharing plan and environmental water management decision making.</p> <ul style="list-style-type: none"> c) Available water determinations and carryover rules were reviewed. No changes are proposed. <p>Available water determinations in groundwater sources can be reduced if extraction exceeds limits. The volume of water in accounts from carryover is considered when determining available water determinations in groundwater sources if limits have been exceeded.</p>
<p>10 Accounting for spatial variation in values and risks</p> <p>By 1 July 2023, the department should use best available evidence, to reassess</p>	<p>Closed.</p>

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<p>the socioeconomic, cultural and environmental value of all management zones/water sources in the plans including:</p> <ul style="list-style-type: none"> a) fine scale High Ecological Values Aquatic Ecosystems (HEVAE) mapping consistent with data used for other NSW Government planning processes b) reviewing trade limitations with a view to manage trade across broader areas provided environmental outcomes can be maintained c) the full range of economic benefits and impacts of water extraction and presence of water in-stream when considering the economic dependence of water sources, such as: <ul style="list-style-type: none"> i. benefits and impacts of secure water supply and time on water restrictions for town water supplies including residential and industrial uses ii. benefits and impacts of flow and water quality on industries and water uses such as tourism, ecosystem services and recreation and community activities. <p>Where necessary, the department should then amend both plans' rules to address any changes to classifications and ensure that the high value environmental ecosystems are protected by the plan rules, without unnecessarily inhibiting trade.</p>	<ul style="list-style-type: none"> a) The department used the HEVAE framework to identify high priority groundwater-dependent vegetation ecosystems. b) The review of groundwater source boundaries reduces trade barriers while maintaining environmental outcomes. c) The risk assessment approach was revised identifying expanded socioeconomic, cultural and environmental values and encompasses additional risks to these values which are greater in the Metropolitan area (dewatering and urbanisation). The risks assessed incorporated: <ul style="list-style-type: none"> i. fine scale HEVAE mapping consistent with other NSW Government planning ii. reviewing groundwater source boundaries and trade limitations - with some boundaries removed with hydrogeological evidence to support the change iii. the full range of economic benefits and impacts of water sources.

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<p>11 Accounting for spatial variation in values and risks</p> <p>By 1 July 2023, the department should:</p> <ul style="list-style-type: none"> a) better define connectivity terminology with respect to spatial and temporal variation and needs of different aquifer types b) strengthen the evidence base across the plan area regarding the extent and spatial variability of connectivity through on ground studies and mapping c) specifically refer to known areas of high connectivity and lower connectivity, and distinguish between discharging and receiving groundwater systems, and gaining and losing streams to better manage the Surface and Groundwater Plans as a whole. 	<p>Closed.</p> <p>a) The water sharing plan is a statutory document setting the rules for water sharing. It is not the place for definitions that are not critical to the operation of the rules. NSW's definitions of connectivity are included in the Macro water sharing plan - the approach for groundwater. A report to support community consultation.</p> <p>b) and c) Where updated connectivity data is available to inform plan development, it has been utilised. Any improved understanding of connectivity is reflected in documentation supporting plan development, public exhibition and plan commencement.</p>
<p>13 Accounting for spatial variation in values and risks</p> <p>By 1 July 2023, to improve Groundwater Plan clarity and protection of GDEs to achieve environmental outcomes, the department should:</p> <ul style="list-style-type: none"> a) Clearly define groundwater terms and their relevance to the Groundwater Plan, including GDEs, high priority (to include culturally significant sites), groundwater type, and connectivity – connectivity should include both discharge of groundwater to surface water and surface water recharge to groundwater systems b) include known values relating to culturally significant groundwater dependent sites in the revised Plan 	<p>Closed.</p> <p>The replaced plan provides:</p> <ul style="list-style-type: none"> a) An improved dictionary which defines groundwater terms used in the water sharing plan including GDEs. High priority GDEs are identified in the plan and are those GDEs where distance restrictions for water supply works apply unless a location, at a lesser distance, results in no more than minimal harm. The departments website outlines how high priority (vegetation) GDEs are identified. Distance restrictions outlined in the plan do not apply to other groundwater-dependent ecosystems that may occur within the area. In contrast, distance restrictions apply to all known culturally significant sites to mitigate impacts of groundwater extraction unless locating the works at a lesser distance would result in no more than minimal harm. b) Rules for managing water supply works near known culturally significant sites (identified on the Aboriginal

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<p>and ensure these are protected by the plan provisions</p> <p>c) ground-truth updated DPE–EES HEVAE mapping for the presence and extent of GDEs, including estuarine ecosystems. Identify and clearly refer to high priority ecosystems (considering defined factors such as cultural significance, presence of endangered ecological communities, period of groundwater dependence, suitability of water quality, representativeness)</p> <p>d) review setback distances for work near identified GDEs and standardise these based on the NSW Aquifer Interference Policy 2012.</p>	<p>Heritage Information Management System). Works must be outside restricted distances unless there is no more than minimal harm to the groundwater dependent culturally significant area.</p> <p>In addition to the plan rules, under Priority 2 of the State Water Strategy and while developing the state-wide Aboriginal Water Strategy, the department continues to engage with Aboriginal communities about social, cultural, spiritual and customary objectives. It is a priority to recognise cultural values in water management, as well as Aboriginal rights and values and increase access to and ownership of water for cultural and economic purposes.</p> <p>c) High priority GDEs have been identified and mapped based on the latest available information and method. This takes account of the probability of groundwater dependence and the ecological value of the GDE. See https://www.industry.nsw.gov.au/water/science/groundwater/ecosystems for more information on how the department identifies high-priority GDEs. The plan allows that these mapped high probability vegetation GDEs may not be groundwater dependent. A high probability of groundwater dependence may be confirmed before applying distance restrictions to mapped High Priority GDE vegetation communities. The plan also includes amendment provisions allowing updates to high priority GDE if new information becomes available.</p> <p>d) Set back distance rules for new works near GDEs were reviewed and align with standard distance rules where appropriate based on hydrological expertise.</p>
<p>15 Supporting outcomes for Aboriginal people</p> <p>Amend the plans to reflect all current native title claimants and Indigenous Land Use Agreement holders comprehensively and reflect this consistently across both plans. Undertake detailed engagement with</p>	<p>Closed.</p> <p>The replaced plan reflects current Native Title determinations and can be amended to reflect the outcome of pending claims.</p> <p>Targeted consultation has addressed understanding water licensing, water availability and options for aboriginal communities. Aboriginal organisations and community</p>

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	these Native Title groups to determine water allocations and access options.	representatives were invited to make a submission on the draft plan during public exhibition.
16	<p>Supporting outcomes for Aboriginal people</p> <p>Undertake subsequent work with Aboriginal stakeholders and Traditional Owners to further understand all water-related values (for surface and groundwater) and better protect them through plan provisions.</p>	<p>Ongoing.</p> <p>We reached out to several Aboriginal organisations in the Greater Metropolitan plan area. Consultation will continue with Aboriginal organisations over the life of the plan.</p> <p>The department will work toward priorities in the State Water Strategy. Priority 2 of the State Water Strategy is the Recognise First Nations/Aboriginal People’s rights and values and increase access to and ownership of water for cultural and economic purposes.</p> <p>The NSW Government recognises First Nations/Aboriginal People’s rights to water and our aim is to secure a future where water for First Nations/Aboriginal People is embedded within the water planning and management regime in NSW, delivering cultural, spiritual, social, environmental and economic benefit to communities.</p> <p>Actions under the State Water Strategy include:</p> <ul style="list-style-type: none"> • Strengthening the role of First Nations/Aboriginal People in water planning and management. • Developing a state-wide Aboriginal water strategy. • Providing for Aboriginal ownership of and access to water for cultural and economic purposes. • Working with First Nations/Aboriginal People to improve shared water knowledge. • Working with First Nations/Aboriginal People to maintain and preserve water-related cultural sites and landscapes. <p>The department is committed to providing greater opportunities for Aboriginal water management and participation in water sharing. A new Aboriginal water directorate has been established within the department and work is progressing on an Aboriginal Water Strategy, which will identify the ways in which we can achieve the priorities under the State Water Strategy.</p>
17	<p>Supporting outcomes for Aboriginal people</p>	<p>In progress.</p>

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<p>Reserve unallocated water for Aboriginal specific licences or other Aboriginal water access options, before being offered to the market on commercial terms.</p>	<p>This issue has been incorporated into Aboriginal Water Strategy development.</p> <p>The replaced plan allows Aboriginal community development specific purpose licences in water sources where there is unassigned water.</p>
<p>18 Supporting outcomes for Aboriginal people</p> <p>Finalise an NSW Aboriginal Water Strategy in 2021 to provide consistent, transparent guidelines and resourcing for Aboriginal water management across NSW, comprising the following at a minimum:</p> <ul style="list-style-type: none"> a) Improve recognition of native title by including a common provision to undertake preliminary amendments to a plan within six months of a native title determination or other agreement that includes water allocation b) allow additional time to undertake detailed engagement with Traditional Owners, make water allocations and final plan amendments; considering native title claims proactively as part of water sharing planning c) identify Aboriginal water values and uses, objectives and outcomes by undertaking extensive engagement with Aboriginal stakeholders in all plan areas; prioritising allocations to protect values; adopting cultural landscape-scale principles; integrating identified values into ongoing water planning and management d) co-design Aboriginal specific licences or other water access options with key Aboriginal 	<p>Closed.</p> <p>Action as in recommendation 16.</p> <p>There are no native title determinations in the Greater Metropolitan plan area. The plan therefore indicates that on commencement, the amount of water required to satisfy native title rights is estimated as OML/yr.</p> <p>The replaced plan will be amended as soon as practical to give effect to, or in connection with, a determination made after the plans commence. Amendments commonly take approximately six months to process as they require approval by multiple Ministers.</p>

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<p>stakeholders that meet identified needs for a range of cultural, environmental, social and economic uses.</p>	
<p>19 Supporting outcomes for Aboriginal people</p> <p>By 1 July 2022, the department should improve MER to increase transparency and support the achievement of Plan outcomes in line with the water management principles and priorities of the Act. This should include:</p> <ul style="list-style-type: none"> a) Completing relevant studies identified in the 2011 Plans b) developing a publicly available research plan for the completion of further studies required to improve the knowledge base and for adaptive management – required studies should also be included in the plans c) developing plan-specific, publicly available MER frameworks consistent with the coastal and state-wide guidelines. The framework should include linked and specific, measurable, achievable, relevant and time-bound (SMART) objectives, strategies and performance indicators, define roles and responsibilities, set timely public reporting requirements and include adaptive management processes. 	<p>In progress.</p> <p>The department is developing a monitoring, evaluation and reporting (MER) framework for coastal water sharing plans. The framework will help coordinate activities conducted by multiple agencies. In this way, MER activities can deliver on specific agency requirements and contribute to a broader understanding of water management and river and wetland health over time. The implementation of any MER programs is dependent on having a defined, long term budget. While every effort is made to maintain a MER program, the ability to implement aspects in a MER is limited by resources.</p> <p>The department has undertaken two studies to support efficient and effective use of scarce monitoring funds throughout NSW. The 'prioritisation' study is designed to deliver advice on which water sources should be targeted for monitoring activities and why, while the 'transferability' study is designed to deliver a model that will allow us to know with high probability which water sources are so similar to each other that they can be considered synonymous. The two projects combined will allow us to maximise the results from monitoring activities, and transparently share the results with stakeholders.</p> <p>Implementation of the MER program will commence in late 22. This will clarify the roles and responsibilities, reporting requirements, governance arrangements and timeframes associated with the program.</p> <p>The MER plan will include SMART objectives, strategies and performance indicators that are linked to the Act's outcomes. This will align with the Act priorities.</p>

Table 2. Department response to NRC Review suggested actions

NRC suggested actions for the department to support the replacement plan (May 2021)		Action taken against NRC suggested actions (November 2022)
A	<p>Managing extraction volumes</p> <p>Finalise the reasonable use guidelines for domestic and stock use by 1 July 2022 and include the agreed standards as part of the replacement plans.</p>	<p>In progress.</p> <p>A project is underway to review the need and options for regulation of take under domestic and stock basic landholder rights. The project is aimed at determining the most appropriate framework for managing take under these rights, according to the level of risk, and may or may not result in reasonable use guidelines.</p>
B	<p>Managing extraction volumes</p> <p>Policies around exempt and externally managed extraction should be finalised to inform the replacement plans' development, for example stormwater harvesting and construction and maintenance dewatering.</p>	<p>In progress.</p> <p>Policies around exempt and externally managed extraction are being progressed by the department but will not be finalised in time to inform the replaced plan.</p>
D	<p>Improving plan delivery</p> <p>Continue to develop state-wide evaluation framework and monitoring plan, considering and addressing key gaps and prioritising MER activities based on values and risk. The framework, monitoring plans and reporting should be publicly available to improve transparency.</p>	<p>See response for Recommendation 19.</p>
E	<p>Improving plan delivery</p> <p>Adopt additional mechanisms to support metering and measure water extraction and movement across the plan area, such as remote sensing, to improve calculation of LTAAEL compliance and support adaptive management.</p>	<p>In progress.</p> <p>When the NSW Non-Urban Metering Framework comes into effect in the Greater Metropolitan plan area; users will be required to install accurate, tamper-free meters and telemetry devices if they meet the thresholds established under the framework. The department, in conjunction with NRAR and WaterNSW, are supporting water users as they transition to the new framework.</p>

NRC suggested actions for the department to support the replacement plan (May 2021)		Action taken against NRC suggested actions (November 2022)
<p>F</p>	<p>Improving plan delivery</p> <p>The department should adopt state-wide processes that support the plan remake and implementation by:</p> <ul style="list-style-type: none"> a) enhancing communication of water sharing plans through active, simple, and consistent language and modes of communication b) improving implementation using clear and consistent governance, roles and responsibilities, and timelines. 	<p>Ongoing.</p> <p>The water sharing plan template has been updated to improve readability and has been drafted by Parliamentary Council Office.</p> <ul style="list-style-type: none"> a) As part of public engagement pre and post remake, the Department follows a programme of effective communication. Much of this involves the delivery of public documents, for example, rule summary sheets, background documents, guides to water sharing. These documents assist to communicate the rules of the plan in 'plain English'. These documents are periodically reviewed for their effectiveness. Departmental staff are also available to advise on the rules and assist licencees understand rules. b) These communication programmes are one consideration of the implementation programmes the Department is now developing for water sharing plans. The implementation programmes shall in part establish unambiguous governance, roles, responsibilities etc for the delivery of key provisions of a plan.

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<p>G</p>	<p>Improving plan delivery</p> <p>By 1 July 2023, the department should liaise with WaterNSW and the Natural Resources Access Regulator (NRAR) to ensure that Surface and Groundwater Plan provisions are practical, enforceable, and can readily be placed on access licences where relevant. Access licences should reflect plan provisions.</p>	<p>Closed.</p> <p>The department has been working in close collaboration with WaterNSW during the development of both Greater Metropolitan Plans. WaterNSW has provided valuable advice relating to the practicality of plan provisions and the how plan drafting can support systems operations.</p> <p>The department provided both the draft Surface and Groundwater Plans to NRAR to comment on the enforceability of provisions. The draft plans were provided to the department’s Implementation team responsible for drafting and imposing mandatory conditions.</p>
<p>H</p>	<p>Improving plan delivery</p> <p>As part of the plan replacement, the department should develop well-evidenced and resourced processes for stakeholder engagement in the plan area. This should be part of a strengthened state-wide stakeholder engagement strategy.</p>	<p>Closed.</p> <p>A communication and engagement plan has been developed and supporting material produced to help explain the changes in the replaced plan.</p> <p>An external consultant was engaged to help deliver the public exhibition component of the plans.</p>

NRC suggested actions for the department to support the replacement plan (May 2021)		Action taken against NRC suggested actions (November 2022)
I	<p>Improving plan delivery</p> <p>By 1 July 2023, the department should adopt integrated catchment management approaches that support the plans' replacement and implementation.</p>	<p>Water sharing plans are developed in accordance with the requirements of the Act and cannot direct catchment actions not related to water sharing.</p> <p>That said, the department will work toward priorities in the State Water Strategy. Priority 4 of the State Water Strategy is to increase resilience to changes in water availability (variability and climate change). Action 4.4 under this priority is to better integrate land use planning and water management.</p> <p>The Government will work to better integrate strategic land use planning with water management frameworks and outcomes. Taking steps to:</p> <ul style="list-style-type: none"> a) Establish processes to support communication and early engagement to better inform land use, agriculture and industry investment decisions based on a clear understanding of water availability and constraints, and water allocation risk over the immediate and longer term. b) Develop new planning policies, if required, to integrate land use and water cycle management decisions. c) Identify opportunities for the planning system to support water resource health and resilience in a changing climate; for example, through strategic recognition of critical groundwater resources in coastal areas and mitigate impacts from urban development. d) Improve access to information about water availability to support development.