

Draft NSW Water Strategy submission form

The NSW Water Strategy will be the first 20-year water strategy for all of NSW. It will provide a blueprint to help us tackle the key challenges and opportunities for water management across the state.

For more information about the strategy or to download a copy of the strategy, please visit dpie.nsw.gov.au/nswwaterstrategy.

Your voice is important

We would like to hear your views on the draft strategy, including whether you think it identifies the right priorities, challenges, opportunities and actions.

Please provide your feedback in the submission form below and email your completed submission to nsw.waterstrategy@dpie.nsw.gov.au or post to NSW Water Strategy, Department of Planning, Industry and Environment, Locked Bag 5022, Parramatta NSW 2124 **by 28 March, 2021**.

The form will take approximately 15 minutes to complete and your response can remain anonymous if you wish (see question 1).

Questions marked with an asterisk (*) require an answer.

If you have any questions about making a submission, please email: nsw.waterstrategy@dpie.nsw.gov.au

Making your submission public

We collect information about you, which may include personal information, to assess submissions in response to the department's dealings and activities, and to perform other functions required to complete the project. This information must be supplied. If you choose not to provide the requested information we may not be able to assess your submission.

To promote transparency and open government, we intend to make all submissions publicly available on our website, or in reports. Your name or your organisation's name may appear in these reports with your feedback attributed, unless you have chosen to remain anonymous.

If you would like your submission and/or feedback to be kept confidential, please let us know when making your submission. You will be asked for your confidentiality preference at question 1.

If you request that your submission be kept confidential, it will not be published on our website or included in any relevant reports. However, it will still be subject to the *Government Information Public Access Act 2009*.

Your submission will be stored securely consistent with the department's Records Management Policy and you have the right to request access to, and correction of, your personal information held by the department.

Further details can be found in our privacy statement available on our website. industry.nsw.gov.au/privacy

1. Information on confidentiality and privacy*

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

- Yes
 No

I would like my personal details to be kept confidential.

- Yes
 No

2. Your details

Name* Graham Dooley

Contact phone number* 0879998555

Postcode* 5000

Email address* gdooley@wua.com.au

Do you identify as an Aboriginal person?

- Yes
 No

Are you an individual or representing an organisation?*

- Individual
 Organisation

3. Organisation or business details

Who do you represent?

- Government Please specify
 Peak representative organisation Please specify
 Local Water Utility
 Other (please specify)

4. Draft vision

The NSW Government has developed the draft NSW Water Strategy as part of a suite of long-term strategies to maintain the resilience of the state's water services and resources over the coming decades.

The proposed vision for the draft NSW Water Strategy is sustainable water resources for thriving people, places and ecosystems, both now and for future generations.

Which aspects of water management are most important to you and your local community?

We are a large-scale investor of Australia superannuation funds in water infrastructure. We pride ourselves on delivering high quality water, affordable, reliable and sustainable water supply services (municipal, agricultural, industrial) across Australia through the infrastructure we invest in. We own four water utilities across two States, including two in NSW.

The best strategy is one that meets the needs and challenges that currently exist but also allows for the reasonably anticipated challenges of the future to be included within the scope of the Strategy. This Draft NSW Water Strategy is commendable in setting out a policy and planning framework to achieve that.

The Strategy omits one critical element: The State and Local Governments of NSW have real and ongoing limits on the amounts of capital they can apply to re-capitalise existing infrastructure and apply to new infrastructure. The great unspoken challenge of this Strategy is how to harness the investment horsepower of the super funds of Australia. To partner with Government capital. This topic warrants inclusion.

Do you support the proposed vision for the draft NSW Water Strategy?

- Yes
 No

Please tell us more about your response:

The 7 Priorities (pages 42, 43) are very well structured and are hence strongly supported. However, the re-capitalisation of the LWU's across NSW is likely to require ~\$10B. This means that both the capital and the skills to deploy that capital need to be harnessed and focussed. It almost needs a new Priority 8. References and inferences in items 5.4, 6.4, 6.9, 6.10 and all of 7 are not sufficient. The presumption that the financial future of water is merely an extrapolation of the current practice is not enough.

5. Draft objectives

The draft NSW Water Strategy sets high level objectives and principles to guide water service delivery and resource management across NSW. We have identified six core objectives which underpin the draft strategy. These are based on the *Water Management Act 2000*. They are:

- protecting public health and safety
- liveable and vibrant towns and cities
- water sources, floodplains and ecosystems protected
- cultural values respected and protected
- orderly, fair and equitable sharing of water
- contribute to a strong economy.

Which objectives are most important to you?

Please rank the objectives from most important to least important (where 1 is most important and 6 is least important).

Protecting public health and safety

Liveable and vibrant towns and cities

Water sources, floodplains and ecosystems protected

Cultural values respected and protected

Orderly, fair and equitable sharing of water

Contribute to a strong economy

Do you have any comments on any of the proposed objectives?

All of these objectives are important and need to be delivered upon. The Australian Productivity Commission (2017) suggested that the price that residents pay for water and sewerage in the non-metro regions ought to be similar to the price paid by equivalent residents in the two metro areas. The PC suggested an equalisation mechanism. This line of thinking needs to be picked up and included. We suggest this be a strategy topic included in the Strategy, not relegated to an implementation phase.

6. Draft guiding principles

The draft strategy also proposes seven principles to guide the long-term strategic planning for water resource management in NSW. These principles work in tandem with the draft objectives to guide development and implementation of actions.

The guiding principles are:

- healthy environments sustain social and economic outcomes
- water is a limited (although recyclable) resource
- systems thinking to optimise outcomes
- data-enabled planning and decision-making
- transparency and accountability to engender community trust
- forward thinking to build preparedness and resilience
- giving effect to Aboriginal rights and access to water.

Which principles are most important to you?

Please rank the objectives from most important to least important (where 1 is most important and 7 is least important).

Healthy environments sustain social and economic outcomes

Water is a limited (although recyclable) resource

Systems thinking to optimise outcomes

Data-enabled planning and decision-making

Transparency and accountability to engender community trust

Forward thinking to build preparedness and resilience

Giving effect to Aboriginal rights and access to water

Do you have any comments on any of the guiding principles?

There is another principle, in our mind: Subject to some caveats, residents in non-metro towns and cities ought to pay a similar price for their water and sewerage services as equivalent residents in the metro areas. This should occur notwithstanding that some regional centres will have much higher costs.

We are fully aware that this is a difficult topic, but if NSW is to have a comprehensive and enduring Water Strategy, this question of residential affordability needs inclusion.

7. Opportunities, challenges and actions for improved state-wide water management

The draft NSW Water Strategy outlines seven strategic priorities for action, focused on meeting the core objectives based on the *NSW Water Management Act 2000*. These strategic priorities are:

1. Build community confidence and capacity through engagement, transparency and accountability
2. Recognise Aboriginal rights and values, and increase access to and ownership of water for cultural and economic purposes
3. Improve river, floodplain and aquifer ecosystem health, and system connectivity
4. Increase resilience to changes in water availability (variability and climate change)
5. Support economic growth and resilient industries within a capped system
6. Support resilient, prosperous and liveable cities and towns
7. Enable a future focused, capable and innovative water sector.

Under each priority the draft strategy identifies several opportunities and challenges, and a total of 41 proposed actions to improve water management across the state.

Do you have any comments on the seven strategic priorities identified?

As identified in our comments above, an 8th Priority covering the sourcing and application of the capital that is needed, harnessing that capital (in a partnering configuration between Government capital and superannuation investors) and the issue of the residential water and sewerage prices needs inclusion.

Do you have any comments on any of the proposed actions identified?

All seem good.

Are there any additional opportunities, risks and challenges that should be considered in the draft strategy?

Only the sourcing and application of capital, together with the retail price equalisation proposal from the Productivity Commission.

What actions should be prioritised for immediate implementation and how should they be implemented?

Our sense is that the people of non-metro NSW are looking for leadership from the Government. We suggest that the LWU's be aggregated into larger management units along the lines of modified (as to governance and funding) Water County Councils.

We also suggest that topics like resilience in the face of drought and extreme weather (bushfires etc) be implemented as very public priorities.

8. Other comments

Do you have any other comments on the draft NSW Water Strategy?

This is a very good document that we encourage be updated with the 3 topics of:

1. Re-forming and aggregating the LWU's into bigger entities
2. Partnering with superannuation capital
3. Affordability at the retail level
4. Figure 14 on p. 35 omits WICA utilities in the distribution of water and management of wastewater box

9. How did you hear about the opportunity to provide feedback on the draft NSW Water Strategy?

Please select all that apply from the list below:

- Newspaper
- Radio
- Department of Planning, Industry and Environment website
- Direct email
- Social media
- Have your say NSW website
- Word of mouth
- Other (please describe)