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ABN: 39 638 876 538



Reference: 017-20JM

20 April 2020

Attention: Anthony Rush  
Independent Pricing and Regulatory Tribunal  
PO Box K35  
HAYMARKET Post Shop 1240

**Re: Comments on waterway health outcomes identified in the Draft Report –  
Review of Prices for Sydney Water, March 2020.**

Dear Anthony,

Thank you for the opportunity to comment on IPART's *Draft Report – Review of Prices for Sydney Water* (March 2020).

The Sydney Coastal Councils Group (SCCG) is a regional organisation of Councils that advances sustainable management of Sydney's urban coastal and estuarine environment. We currently comprise nine member Councils who represent 1.3 million Sydneysiders. Our goals include waterways and foreshores being protected and healthier, and marine biodiversity protected in the bioregion.

The SCCG previously provided a submission on the Draft Report in collaboration with other Sydney catchment groups - Cooks River Alliance, Georges River Keeper and Parramatta River Catchment Group. One of the key points of our joint submission was the need to ensure that the health of waterways and coasts are prioritised. To this end, we support the expenditure on Sydney Water's environmental improvement programs.

In our role as project manager of the Greater Sydney Harbour Coastal Management Program (CMP), we would like to make an additional submission on the Draft Report. The CMP, to be developed under the *Coastal Management Act 2016*, aims to involve 21 Councils and multiple state agencies including Sydney Water, and will have a focus on improving waterway health in the catchment. Funding to support such an important initiative is crucial to protect our waterways and to adapt to future threats including climate change and population increases.

We therefore support IPART's decision to provide to Sydney Water allowances over the 2020 determination period of:

- \$22.2 million for the Waterway Health Improvement Program managing impacts of stormwater on the water quality of waterways, allowing it to not defer \$6.5 million into the following period;
- \$183.7 million for abatement of wet weather overflows to waterways most of which is for 'source control' across the three priority catchments Upper Parramatta, Lane Cove and Mid Parramatta; and
- an appropriate amount for the proactive management of dry weather overflows to waterways.



Sutherland Shire  
COUNCIL

INNER WEST COUNCIL



WAVERLEY  
COUNCIL



Bayside Council

northern  
beaches  
council



WILLOUGHBY  
CITY COUNCIL  
City of Diversity



Randwick City Council  
a sense of community



We also support the initiative of IPART allowing 'discretionary service charges' for activities and works to improve waterways as done for the Waterway Health Improvement Program (WHIP) when customer willingness to pay is robustly demonstrated and the expenditure is efficient. It is noted that under the WHIP, Sydney Water has proposed to deliver improved waterway health through stormwater management activities that will increase:

- the length of waterways in good health;
- areas of planted native vegetation;
- sets of recreation facilities; and
- the amount of rubbish and litter removed from Sydney waterways each year.

The CMP can leverage and support these activities and ensure consistency of approaches across all levels of government.

I look forward to the acceptance of the *Draft Report – Review of Prices for Sydney Water* and support for the SCCG to continue leading the important work being undertaken to advance waterway health.

Yours sincerely,



Sarah Joyce  
**Executive Officer**

cc.  
Sydney Water Corporation  
PO Box 399  
PARRAMATTA 2124

