

29 October 2013

Murray-Darling Basin Authority
Constraints Management Strategy 2013 to 2024: draft for public comment

Thank you for the opportunity to provide feedback on the Murrumbidgee Darling Basin Authorities Draft Constraints Strategy 2013 – 2024.

Wagga Wagga City Council fully supports the overall objectives of improving the ecology of the Basin's river systems, the Murray-Darling Basin Plan and acknowledges the intent of the draft Constraints Management Strategy to provide an initial analysis on relaxing or removing priority constraints to improve the delivery of environmental water recovered under the Basin Plan.

It is noted that the Strategy identifies the Murrumbidgee as one of seven key focus areas for further examination and mentions the community of Wagga Wagga as providing input into the strategy.

It is also noted that the strategy identifies a number of potential constraints to environmental water delivery in the Murrumbidgee including: *"the low level Mundarlo Bridge; the channel capacity of the Tumut River; the channel capacity of the Murrumbidgee River near Balranald; and possible third-party inundation and impeded access impacts, particularly around the upper Yanco Creek, Collingullie and Darlington Point"*.

During earlier consultations and discussions with NSW Office of Environment and Heritage (OEH) and more recently the Murray-Darling Basin Authority (MBDA) regarding the potential of relaxing or removing constraints to environmental water delivery in the Murrumbidgee, Council raised a number of significant concerns relative to the Local Government Area (LGA) that have not been acknowledged in the Strategy.

Council recognises that the relaxing of flow constraints is a complex issue that will require extensive and detailed examination, consultation and collaboration as referred in the Strategy, but also recognises the importance of identifying and acknowledging the potential constraints early on in the process.

Accordingly the Strategy should make more detailed reference to the potential constraints to the delivery of enhanced environmental flows. In respect to Wagga Wagga these constraints include:

- direct impact on infrastructure including the inundation of roads, isolation of private property and public facilities
- impact on agricultural production
- increased risk of localised flooding due to reduced capacity of the City's stormwater water system to protect the community against localised flooding during local rainfall events.

- the significance of the potential social and economic impacts for communities such as ours (as demonstrated during the 2012 flood event during which the CBD of Wagga Wagga was evacuated, impacting on approximately 2000 properties)

The Strategy refers to constraints as being rules and structures and fails to adequately acknowledge the significance of the potential social and economic constraints associated with the delivery of enhanced environmental flows.

Whilst the intent of the Strategy is to only provide an initial analysis on potential constraints and not make any decisions on individual constraints, the Strategy should be strengthened by making stronger commitments to undertaking mitigation works before the existing river operating constraints can be considered for removal or relaxation. These works should include but not be limited to:

- upgrading of infrastructure (roads & bridges)
- undertaking flood mitigation enhancement works (raising of levees)
- undertaking erosion control works (river bank stabilisation)
- negotiation of flood easements over private property and compensation of landholders

The water modelling that has been undertaken to identify operational and management constraints and the impacts of removing or relaxing those constraints needs to be expanded to take into account the knock-ons such as the impact on overland flood flows on communities caused by the backing up of tributaries and stormwater systems.

It is critical that the Strategy provides a balanced approach between the needs of the Basin's river systems and those of the community that rely on the rivers. Recognising this philosophy the overarching principles of the Strategy should be expanded to make commitments to not creating any additional risk to communities that are vulnerable and potentially impacted by the removal or relaxation of constraints. For example the vulnerability to riverine and/or localised overland flooding should not be worsened by the removal or relaxation river constraints.

For further discussion or comment on the above please do not hesitate to contact myself on 1300 292 442.

Yours faithfully



Heinz Kausche
Director Infrastructure Services