



A Co-operative venture of the municipalities of:
Cockburn, East Fremantle, Fremantle, Kwinana, Melville & Rockingham

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Contact: Mick McCarthy (08) 9364 0631

Reference: DoW Discussion Paper - Managing Unallocated Water

Discussion Paper: Managing Unallocated Water in Western Australia
Strategic Policy Division
Department of Water
PO Box K822
PERTH WA 6842

Dear Sir,

**SOUTH WEST GROUP SUBMISSION ON DEPARTMENT OF WATER
DISCUSSION PAPER: MANAGING UNALLOCATED WATER IN WESTERN
AUSTRALIA**

This submission from the South West Group is in response to the above discussion paper prepared by the Department of Water (DoW).

The South West Group, formed in November 1983, is a Voluntary Regional Organisation of Councils (VROC). It comprises the Cities of Cockburn, Fremantle, Melville, and Rockingham, and the Towns of East Fremantle and Kwinana. The South West Group is managed by a Board consisting of the Mayors and CEOs of its member local governments.

The South West Group seeks to work with these six local governments and through cooperation with industry, community and the other spheres of government to capture a wide range of opportunities to enhance economic growth as well as supporting a diversity of quality lifestyles whilst servicing and sustaining cohesive, productive communities in an enviable environmental setting.

The local governments in the region hold numerous DoW licences to abstract water and undertake a critical role in the management and irrigation of Public Open Space (POS) for the benefit of their communities and other users. This use is considered of the highest value as a community benefit and any change in policy for unallocated water will have significant implications for local government as a key stakeholder and water user.

The region is expecting significant population growth over the next 50 years, which will have a direct impact on increased urban development and the establishment of passive and active POS.

ABS data on population growth for the South Metropolitan Area of Perth is provided in the table below.

Year	Population
2010	363,066
2020	446,860
2027	512,486
2060	750,000*

**Ultimate population estimated by the South West Group*

In reviewing the discussion paper, the South West Group offer the following comments prepared in consultation with the member Councils.

- General support for the DoW putting in place a more robust and equitable arrangement for groundwater allocation
- Local Governments require access to groundwater to sustain public open space and maintain an acceptable standard of amenity in our communities
- This "public good" use by Local Government should be recognised as one of the highest priority uses of groundwater and a use that is highly valued by the community
- On the basis that each Local Government provides a large range of community infrastructure that benefits residents of the Greater Perth Metropolitan Area and not only the residents of the municipalities, Local Government should receive a higher priority in the allocation of groundwater to adequately service POS and other infrastructure for the wider community
- The Councils in the South West Corridor are growing at a significant rate and there is increased demand for active and passive public open space and associated groundwater use
- Local Governments are recipients of POS irrigation systems established by developers and transferred to Local Government following a period after practical completion of subdivisions
- Preliminary data gathered by the member Councils indicate an annual increase in POS irrigation demand of approximately 2.0 to 2.5 GL over the next 5 – 15 years throughout the South Metropolitan Area of Perth.
- This "community driven" water resource demand will primarily need to be drawn from the Jandakot Mound, Rockingham, Stakehill and Cockburn groundwater areas and other superficial aquifers and/or the deeper Leederville and Yarragadee confined aquifers (quality and availability permitting).
- This projected Local Government demand in groundwater allocation for POS irrigation across the South Metropolitan Area region represents a significant water resource allocation that requires protection by the State Government

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- Further details on consultation with Local Government during the transition phase for the proposed policy is required
- Established communication protocols between DoW and Local Governments is required as a standard requirement for water allocation requests being assessed by DoW. This should include the transition phase associated with the progress of this proposed policy initiative
- Greater explanation of the proposed auction arrangements, together with the process for resolving conflicting uses arising involving multiple bids for available groundwater resources, are required
- By not allowing sufficient allocation of water for POS irrigation to Local Governments in developing communities, some communities will be adversely affected to the extent that there may be no allocation of water in certain areas. This will become a significant issue in developing communities and will potentially lead to inequities and community backlash, as well as adversely impact on the standard of public amenity and housing within certain precincts.
- In addition, a lack of groundwater may influence developments to be relocated to areas that have an adequate water source, thereby potentially reducing urban growth in areas identified for urban and future urban development.

In allocating groundwater, it is considered essential for DoW to be engaging far more closely with each Local Government impacted by water resource allocation requests. This will enable each Council to assess the impact of an allocation request on current and future groundwater demands at that locality.

The member Councils request that they be consulted for any allocation application from any other proponents that could potentially threaten Local Government access to groundwater supplies.

I trust that the DoW will consider the above points in finalizing the policy for unallocated water in WA and recognize the importance of Local Government's use of groundwater for POS irrigation as an essential use and highly valued community benefit.

Yours sincerely



Mick McCarthy
Director South West Group