

Our Reference: 0755
Enquiries: Peter Slocomb

11 May 2011

Upper Ovens WMP
c/- Matthew Pethybridge
Goulburn Murray Water
PO Box 165
TATURA VIC 3616

Dear Matthew

Draft Upper Ovens River Water Management Plan – Response to Prescriptions

Further to the recent release of the Draft Upper Ovens River Management Plan, North East Water has reviewed the draft and provides its response, in the prescribed format, as follows:

Prescriptions – Management Zones (Page 30)	Rating 1
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Comments:

North East Water is supportive of the concept of Zone 1 and Zone 2 groundwater resource zones as a means of managing both surface water and groundwater resources in the Ovens Valley.

Prescriptions – Restrictions on Taking Water in Management Zone 1 (Page 34)	Rating 1
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Comments:

No comments provided.

Prescriptions – Transitional arrangements for Zone 1 Groundwater (Page 38)	Rating 2
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Comments:

North East Water is responsible for providing water to the communities of Harrietville, Bright, Porepunkah and Wandiligong. The Corporation intends to continue to utilise groundwater resources as part of its immediate and long term contingency planning. A significant amount of infrastructure is associated with this contingency plan, which may be at risk of becoming redundant, if no transitional arrangements are made.

North East Water seeks dispensation to allow it to transition the groundwater resources currently provided for its contingency planning over the same period of time as is being provided for enterprises with permanent plantings. That is, over a period of up to 9 or 10 years.

Prescriptions – Restrictions and prohibitions on issuing take and use licences (Page 41)	Rating 2
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Comments:

North East Water is currently proposing to construct a 520ML off river water storage at Freeburgh to improve the reliability of the Bright supply and to contribute towards the achievement of the Environmental Water Reserve, as prescribed by Action 3.8 of the Government White Paper, *Securing Our Water Future Together*.

It is conceivable, beyond the current planning horizon, which includes the development of the off river storage, that North East Water will seek to further augment its water supply for Bright through the development of a groundwater bore field at Freeburgh within the Zone 2 Management Zone.

The Water Management Plan should accommodate this possibility.

Prescriptions – Restrictions and prohibitions on issuing works licences (Page 43)

Rating 1

Comments:

No comments provided.

Prescriptions – Transfers within Management Zone 1 (Page 46)

Rating 2

Comments:

North East Water is proposing to transfer the diversion point for its Bulk Water Entitlement for Bright, from Hawthorn Lane in Bright, upstream to Freeburgh, a distance of approximately 7 kilometres. It is intended that the extractions rules associated with this amended BE will permit both summer and winter diversions, but with different low-flow environmental flow triggers. That is, the amended BE will not be exclusively a winter fill BE. These rules have been developed in consultation with DSE and Goulburn Murray Water and should be recognised or accommodated by the plan.

North East Water seeks clarification as to whether its BE for Bright will be subject to the same restrictions as are to be applied to irrigation licences.

Prescriptions – Transfers between Management Zone 1 and 2 (Page 47)

Rating 1

Comments:

No comments provided.

Prescriptions – Domestic and Stock Transfers (Page 47)

Rating 1

Comments:

No comments provided.

Prescriptions – Licence Transfers into the Protection Area (Page 48)

Rating 1

Comments:

No comments provided.

Prescriptions – On-Property Licence Transfers (Page 48)

Rating 1

Comments:

No comments provided.

Prescriptions – Off Property Licence Conversions (Page 50)

Rating 1

Comments:

No comments provided.

Prescriptions – On-Property Licence Conversions (Page 50)

Rating 4

Comments:

Prescriptions 39 and 42 appear to be inconsistent. If surface water and groundwater within Zone 1 are conceptually to be treated the same shouldn't the restrictions associated with the transfer, from one to the other be the same.

That is, it seems unreasonable to require the transfer of an on-property surface water licence to a Zone 1 groundwater licence, to be as a winter-take licence, if the same restriction does not apply in the other direction.

Prescriptions – Meter Installations (Page 52)

Rating 1

Comments:

No comments provided.

Prescriptions – Meter Reading and Accounting for Use (Page 53)

Rating 1

Comments:

No comments provided.

Prescriptions – Monitoring (Page 56)

Rating 1

Comments:

This is a key requirement and is necessary to monitor the success of the Water Management Plan.

Prescriptions – Revocation of the Permissible Consumptive Volume (Page 57)

Rating 1

Comments:

No comment provided.

Prescriptions – Review of the Plan (Page 58)

Rating 1

Comments:

No comment provided

Additional Comments

North East Water's proposal to construct the 520ML water storage carries with it the normal risks associated with the provision of environmentally sensitive and capital intensive water supply infrastructure. The timeliness of project delivery and certainty of outcome are heavily influenced by a range of factors outside of North East Water's control.

It is requested that the Plan recognises these risks and uncertainties and does not seek to unnecessarily limit North East Water's ability to deliver this project.

Accordingly, North East Water requests that the Plan provides adequate time for the Corporation to transition over to a water supply strategy that is consistent with the management principles of the Plan. For project planning and delivery purposes a period of 10 years is requested.

If you wish to discuss any of the above please call our Mr Peter Slocomb on 02 6022 0542.

Yours sincerely



Craig Heiner
Managing Director

Rating Options

- 1 I support the proposal
- 2 I support the proposal but suggest changes
- 3 Neutral
- 4 Not sure and need more information
- 5 I do not support