Adoption of the Rous Regional Demand Management Plan 2023-2026

Responsible Officer: Group Manager Planning and Delivery (Andrew Logan)

Recommendation

That Council:

1. Receive and note the 33 public submissions lodged during the public exhibition period outlined in the report.
2. Adopt the '*Rous Regional Demand Management Plan (2023-2026)*' and the supporting document that provides background information to the Plan, *'Regional Demand Management Plan Review and Update - Background Information and Recommended Plan Components*' as presented at Council's workshop held on 20 July 2022.

Background

Following consideration of the draft Rous Regional Demand Management Plan (2023-2026) (RDMP) at the 17 August 2022 Council meeting, the draft RDMP was placed on public exhibition on Council's website from 18 August to 12 September 2022.

The exhibition of the document was promoted through Council's social media channels, website and through each constituent council's communication team. Council received 33 submissions on the draft RDMP which are summarised in **Table** 1 *(refer end of report).*

The majority of respondents generally supported most components of the Draft RDMP with one respondent not supporting the draft RDMP. Many of the submissions raised common themes; additional information on these themes is provided below.

Consultation

Submission themes and Rous County Council (Rous) comments

1. Expenditure on demand management

Some submissions suggested that the RDMP should be more ambitious, and expenditure be increased.

The background information provided with the RDMP compares Rous expenditure on demand management with other North Coast water utilities (Coffs Harbour City Council, Clarence Valley Council, Tweed Shire Council). Rous's historical and proposed future budget expenditure is higher than the average compared to the other local water utilities (total, per property and per ML basis).

The planned expenditure in the RDMP is for Rous only, with additional expenditure by the constituent councils on related programs such as water loss management and smart metering (with potentially high capital and operating expenditure).

While additional expenditure by Rous (e.g., through rebates) may reach more customers, the proposed level of expenditure reflects several considerations including learnings from the previous plan, resourcing, and responsible expenditure of public funds. The key focus of this RDMP in terms of residential and non-residential customer programs, is to pilot programs that will identify targeted and more successful incentives for future demand management programs.

The outcomes of these pilot programs will determine recommended longer term programs and associated expenditure.

The RDMP budget also reflects the resources currently available within Rous and the constituent councils to deliver the RDMP successfully.

2. Rainwater tank rebates

Many submissions did not agree with the phasing out of rainwater tank rebates.

Rainwater tanks provide opportunities for reduction in demand during normal climatic conditions (i.e., when the tanks are refilled by rain) and have not been considered as a drought response in the RDMP. During dry periods, the effectiveness of rainwater tanks diminishes (as they can run dry) but larger tanks are able to store more water for prolonged dry periods. The effectiveness of rainwater tanks in reducing demand is most noticeable when tanks are connected to internal uses (which are not significantly varied by climate) and when there is sufficient rainfall to keep water in the tanks. A rainwater tank does not provide any potable water savings unless it is replacing the potable water supplied by Rous, so discretionary uses such as outdoor watering with tank water result in reduced potable water reduction benefit.

The NSW Government's mandatory BASIX requirements will address any demand reduction opportunities from rainwater tanks in new developments and house renovations, therefore Rous rebates would only be available to existing houses on a voluntary basis.

While water saving behaviour is often exhibited by property owners who rely on tank water, the tanks installed in a reticulated water supply area, such as the Rous regional supply area that are connected to internal uses, are required to include a potable water top up (for when a low water level is reached). In this way, the tank never runs dry and the property owner is relying on the potable water supply for internal uses during drier periods. This diminishes the effectiveness of rainwater tanks in contributing to a culture of water conservation and can give the impression that the rainwater tank supply is limitless.

Rainwater tank installations require sufficient area for the tank and pipe work and the amount of water captured would depend on the area of roof draining to the tank. Tanks are also required to include first-flush systems so that some of the volume is not available for use. Many existing urban houses/lots may not be suitable for installation of a tank for water supply, particularly if plumbing retrofit is required to connect to internal uses.

Expected potable water savings with various rainwater tanks sizes, roof area, first flush volume and usage assumptions has been estimated in the RDMP for the purposes of the cost-benefit analysis. Previous studies reported in the RDMP background information conclude that water use of houses with rainwater tanks is highly variable with water savings dependent on many factors, not simply the tank volume and connections. The analysis and evaluation of water meter data before and after installing a rainwater tank (by Rous as part of a 2020 rebate survey) reiterated the complexities of water consumption, demand and identifying opportunities to maximise water savings associated with rainwater tanks.

Expansion of the rebate program to properties not connected to water mains is not expected to assist in potable demand reduction as these properties would still rely on water trucks in dry periods (when the tanks are empty).

Rainwater tank rebates have been a key component of Rous' demand management program since 2003 with over 2,100 tank rebates provided in the period to June 2022. The RDMP recognises that rainwater tank rebates have been popular, but they do not generally provide value for money for Rous and the community, as they are ineffective during extended dry periods and they are not suitable for all customers.

The current rebate program requires a contribution from the property owner of between $745 and $19,450 (based on 21/22 records) depending on the tank size, proposed use and installation requirements. The RDMP includes pilot programs to identify a broader range of effective residential customer incentives in terms of customer engagement, water efficiency and cost-effectiveness. A broader rebate program is expected to reach a larger section of the community that the current rainwater tank rebate program is missing (e.g. lower socio-economic groups, renters, multi-unit dwellings, houses with limited outdoor area etc.).

The RDMP budget includes the existing budget for tank rebates in 2022/23 ($65,000), gradually reducing to $20,000 in 2025/26 with expenditure directed to other components of the RDMP including education and non-residential programs over years 2 to 4 of the program. Rainwater tank rebates have not been ruled out for the future - the residential pilot program may conclude that rainwater tank rebates are recommended, and this would then be included in the next review of the RDMP.

3. Review of current demand management practice

One submission noted that experience from overseas was not considered in the development of the RDMP.

The review of current practice in demand management was limited to NSW and south-east Queensland examples as:

- The climate, hydrology and water resources are similar to the Rous situation. Many of the overseas examples are from very dry areas with limited water resources.
- Rous operations are guided by NSW legislation and jurisdictions where other regulatory models are not directly comparable e.g., water supply in other Australian states is delivered by state government agencies rather than local government. Non-metropolitan water utilities in NSW such as Rous and its constituent councils are also local councils providing the full range of local government services and are less supported by other levels of government in demand management actions.
- The baseline demand of NSW water users is different to (generally lower than) other Australian states and other parts of the world once leaks are taken into account.
- Rous' customer base, water demand and revenue are much lower than many water utilities in metropolitan NSW, other states and overseas examples.
- There is limited large scale development in the Rous region compared to major cities which limits the opportunities for diversification of water resources and water conservation through development controls.
- Water losses in many overseas examples are very high compared to the Rous region and the overseas actions are therefore not always applicable.

4. Voluntary behaviour change approach

A few submissions suggested that a "voluntary" approach to water conservation was not strong enough.

The behaviour change concept which is based on identifying and supporting individuals/households to implement water conservation initiatives, recognises that any changes would be more successful and sustained with this approach. There are already regulatory (mandatory) mechanisms in place to encourage water conservation (e.g. BASIX, pricing, drought restrictions) and technological approaches driven by this regulation and market incentives (e.g. WELS). The behaviour change approach recognises that these measures have been in place for many years and have been effective but are outside of Rous' control.

The RDMP reflects Rous' responsibilities and recognises that Rous has limited influence over State Government policy and constituent council areas of responsibility, such as dual reticulation and water loss management. As stated in the RDMP, Rous will continue to work with and support constituent councils (where and when appropriate) to deliver this work.

5. Climate change

Some submissions suggested that climate change needed to be considered further in the development of demand management programs.

Supply-side solutions and climate change resilience are being addressed through Rous' Future Water Project 2060. The RDMP recognises that demand management should be a key part of future supply arrangements but cannot fully address the predicted impacts of climate change on water resources. The RDMP aims to increase customer resilience to climate change by influencing water use behaviour and providing support to reduce water consumption. Rous will continue to liaise with other levels of government in developing strategies to adapt to climate change, particularly in relation to water extraction, catchment management and managing the competing demands for water resources.

6. Security of supply and drought level of service

Some submissions commented that Rous had modified drought levels of service without community input.

The level of service (5:10:10 rule) adopted for the Future Water Project 2060 is based on NSW Government guidelines for assessing water supply security. Under this design rule, the total time spent in drought restrictions should be no more than 5% of the time, restrictions should not need to be applied in more than 10% of years and when they are applied, the water supply system should be able to provide 90% of the unrestricted dry year water demand (i.e. 10% reduction in demand) through a repetition of the worst recorded drought commencing at the time restrictions are introduced.

This level of service recognises that it will be harder for the community to limit demand in droughts with restrictions due to demand hardening - already reduced demand due to successful water conservation measures. Previous NSW Government guidelines suggested a 5:10:20 rule, which required a 20% reduction in demand with restrictions, but this is no longer considered achievable and has been reduced to 10% in line with current NSW Government guidance. Refer *Assuring future urban water security*. NSW. Draft December 2013.

Drought restrictions will be reviewed as part of the update of the Rous Regional Drought Management Plan (in progress). Modified levels of service such as more frequent or severe restrictions may be considered by Rous as part of the regular review of the Future Water Project 2060, based on the availability of additional water supplies and ongoing secure yield assessments which will consider any new data on climate change. However, any lowering of this level of service may result in inefficient drought practices and costly emergency supplies or running out of water.

7. Water recycling

Some submissions suggested that the RDMP should include more water recycling initiatives.

Ballina and Byron Shire Councils are responsible for effluent management including dual reticulation schemes in their Local Government Areas. Although Byron and Ballina Shire Councils continue to expand non-potable recycled water connections to new residential developments, the high cost of connection and approval along with other challenges, limit the feasibility of retrofitting existing properties that the recycled water rebate in the previous RDMP

was originally intended to target. Further consideration is required to determine a rebate that incentivises the expansion of recycled water to existing residential connections and provides positive return on investment for both the council and the customer.

Following these challenges, the recycled water rebate was reallocated to support non-residential connections through the Sustainable Water Partner Program as the return on investment would be greater with higher water consuming businesses. Although a small number of businesses have connected and others have expressed interest, there is often difficulty with being able to provide eligible businesses certainty around the rebate amount before they commence works, particularly given the total costs are often only known on completion of the project.

These challenges have driven a focus to continue expanding connections to new residential builds (through recycled water as part of BASIX where applicable in Ballina Shire) and reallocation of rebates for non-potable recycled water (provided by Rous) to support business connections (where feasible) through the Sustainable Water Partner Program. Rous will continue to promote recycled water connections (where available in Ballina and Byron shires) as part of non-residential demand management programs.

The Rous Future Water Project 2060 will continue to investigate water recycling options including indirect potable reuse (wastewater treatment plants to Wilsons River Source, Emigrant Creek Dam or aquifer recharge) and direct potable reuse.

8. Previous submissions provided by the Institute of Sustainable Futures

Some submissions recommended that Rous adopt the recommendations of previous submissions provided by the UTS' Institute of Sustainable Futures.

Rous is working within its area of authority, accounting for our regional context, governance arrangements and the responsible expenditure of public funds. Considering these factors, the RDMP proposes a suite of actions to determine the most appropriate direction to achieve demand management outcomes. As part of this, the assumptions of existing and proposed programs, including that proposed by the Institute of Sustainable Futures will be considered. The outcomes of these investigations will inform what demand management initiatives return the most significant reduction in demand, are cost-effective and best suited to our regional context and customer base.

Conclusion

Having considered the public submissions received, the '*Rous Regional Demand Management Plan (2023-2026)'* and '*Regional Demand Management Plan Review and Update - Background Information and Recommended Plan Components'* are recommended to Council for adoption without alteration.

Table 1: Summary of submissions received

Submission - Ref No.		Date received	Themes / summary	Response from Rous
1	D22/19251	29/08/2022	In support of: • Water loss management for Rous and constituent councils and actively monitoring and reporting on water loss programs across all councils. • Ongoing and increased rainwater tank rebates for reasons related to social impact, value of generating neighbourhood discussions and independent storage. • Community education (including recycled water) and retrofit programs.	Support of proposed demand management initiatives is noted. Refer comment on rainwater tank rebates and water recycling above.
2	D22/19434 (First submission)	31/08/2022	• Rous must have a position on optimum number of humans residing in its regions of supply. Rous must acknowledge that a reduction in possible water sources has occurred. • In support of demand pricing, water use efficiency programs, progressing renewable desalination at Byron, trialling water reuse technologies and investigating renewable energy powered atmospheric water generation. • Opposed to new dam.	Management of growth in the region is the responsibility of the NSW Government and local councils rather than Rous as a single purpose water supply authority. Support of proposed demand management initiatives is noted.
3	D22/20417	11/09/2022	In support of: • Demand management to defer new infrastructure. • Expansion of rainwater tank rebates, recycled water, smart metering, coordination with councils regarding leak detection and education. • Increased water costs for non-residential users.	Support of proposed demand management initiatives is noted. Refer comment on rainwater tank rebates and water recycling above.

Submission - Ref No.		Date received	Themes / summary	Response from Rous
4	D22/20418	11/09/2022	In support of: • Demand management to defer new infrastructure. • Smart metering, expansion of programs, rainwater tank rebates (including rural properties), education (value of water and recycled water), leak repairs, recycled water (both potable and non-potable), retrofitting of residential and non-residential customers, increasing water literacy. • Engagement with Institute for Sustainable Futures.	Support of proposed demand management initiatives is noted. Refer comment on rainwater tank rebates water recycling above.
5	D22/20420	11/09/2022	Comments: • Plan needs to go further. Dissatisfied with reliance on voluntary change. • The plan needs to acknowledge and incorporate the severe and unpredictable nature of climate change and subsequent influences on more serious demand management measures and responses from the population. • Suggests consulting with the community on 5:10:10 rule. • Need to acknowledge that Rous cannot commit to providing water for a demand that has no endpoint. • Supports expansion of rebates for rainwater tanks and water bladders including for all new developments (mandatory).	Support of proposed demand management initiatives is noted. Management of growth in the region is the responsibility of the NSW Government and local councils rather than Rous as a single purpose water supply authority. Refer comments on voluntary behaviour change approach, climate change and rainwater tank rebates above.

Submission - Ref No.		Date received	Themes / summary	Response from Rous
6	D22/20421	11/09/2022	In support of: • A well-considered RDMP for long term water security, protection of First Nations Heritage and flora and fauna conservation. • Continued and expanded rainwater tank rebates and program promotion. Strongly disagrees with any phasedown of this program. • Rous to support constituent councils with leakage management. • Recycled water expansion and rebates. • Community education and engagement. • Strategic guide for water restrictions.	Support of proposed demand management initiatives is noted. Refer comment on rainwater tank rebates and water recycling above.
7	D22/20424	11/09/2022	Comments: • Does not support plan, states it is unsatisfactory and inadequate to address global climate change issues. • Does not support individuals choosing their own reasons to change water consumption behaviours – states that this approach reflects a lack of leadership. • Rous is demonstrating a lack of support / leadership for recycled water. • Nil overseas references or references outside an Australian context – this is a narrow approach. • Seeking more robust plan inclusive of pricing, mandatory water conservation requirements and promotion / ownership. Dissatisfied with voluntary model. • Supports major review of proposed plan.	Refer comment on voluntary behaviour change approach, climate change and review of current demand practice above.

Submission - Ref No.		Date received	Themes / summary	Response from Rous
8	D22/20426	11/09/2022	In support of: • Demand management for reduced water abstraction, delivery, and consumption. • The aims, elements and strategies of the RDMP are sensible and the budget is reasonable and well-justified. • Suggests enhanced education and increased expenditure in demand management. • Water loss management is critical and should be a high priority. • Strong support for rainwater harvesting through BASIX, education and subsidies for tanks – this should remain in future Rous RDMPs. • Supports collection and analysis of data to enable setting of targets.	Support of proposed demand management initiatives is noted. Refer comment on rainwater tank rebates above.
9	D22/20428	11/09/2022	In support of: • Water conservation through ambitious RDMP. • More tank rebates. • Complementary behaviour change and education. • Improved data collection (including smart metering) and standardisation across the region. • Recycled water rebates. • “Fixing the leaks” – maybe Rous could support councils with technology and staff.	Support of proposed demand management initiatives is noted. Refer comment on rainwater tank rebates water recycling above.

Submission - Ref No.		Date received	Themes / summary	Response from Rous
10	D22/20429	12/09/2022	In support of: • Demand management as a tool central to IWCM to decrease water consumption in the context of climate change. • Multiple water supply sources. • Expansion of this plan to increase maintenance, rebates, education in the context of total whole of life costs and climate change. • Consider demand management in the context of future planning and modelling. • Rainwater tank rebates should be retained and extended to small tanks for multi-residential developments. • Suggests further consideration of climate change risk in the RDMP including garden/tree rebate for water changes. • Endorses approach of the NSW Institute for Sustainable Futures. • Suggests further opportunities for public feedback, involvement, education and consultation to support public exhibition. • Supports accurate data and wider range of expert advice.	Support of proposed demand management initiatives is noted. Suggested approaches to water efficient gardens would be considered as part of the behaviour change program and review of residential incentives. Refer comment on rainwater tank rebates and climate change above. The behaviour change pilot program proposed in the RDMP may partly address concerns raised about “democratic public involvement”. Segments of the community would be involved in developing future residential programs.
11	D22/20430	12/09/2022	Comments: • Supports Demand Management as a tool central to IWCM. • Urges expansion of this plan to increase maintenance, rebates, education in the context of total whole of life costs and climate change. • Endorse approach of the NSW Institute for Sustainable Futures.	Support of proposed demand management initiatives is noted. Refer comment on expenditure above.

Submission - Ref No.		Date received	Themes / summary	Response from Rous
12	D22/20444 (word version) D22/20445 (pdf version)	12/09/2022	Comments: • Supports demand management as a tool central to IWCM and to decrease water consumption. • Suggests testing rainwater tank rebate scheme in the proposed incentive pilots. • Rainwater tank rebates should be retained and extended to small tanks for multi-residential developments. • Encourages promotion and education of recycled water. • Encourages prioritisation of smart metering in residential and commercial properties. • Suggests reducing the need for water supply infrastructure. Opposed to Dunoon Dam. • Suggests encouraging drought resilient green spaces. • Endorses approach of the NSW Institute for Sustainable Futures including retrofit program and community consultation around “Level of Service.” • Supports education, engagement and opportunities for public participation and data accuracy. • Recommends fast-tracking delivery and expenditure to realise benefits sooner.	Support of proposed demand management initiatives is noted. Refer comment on rainwater tank rebates water recycling and expenditure above. Suggested approaches to expansion of native vegetation would be considered as part of the behaviour change program and review of residential incentives. The behaviour change pilot program proposed in the RDMP may partly address concerns raised about “democratic public involvement”. Segments of the community would be involved in developing future residential demand management programs.

Submission - Ref No.		Date received	Themes / summary	Response from Rous
13	D22/20446	12/09/2022	Comments: • Need for a publicity officer to actively educate the community. • Recycled water inadequately addressed in RDMP. In support of: • Enhanced community involvement and active education. • Continued and expanded rainwater tank rebates to include properties not connected to mains water. • Investigating alternative cost-effective residential customer incentives. • Smart metering. • Improved data collection and standardisation across the region as well as informing customers of consumption data (smart metering). • Enhanced promotion of recycled water where available. • Education including coinciding information with the deployment of smart meters. • Reducing need for water supply infrastructure. Against the Dunoon Dam proposal. • Endorse approach of the NSW Institute for Sustainable Futures including community consultation around “Level of Service.”	The RDMP includes a new education resource and facility in addition to development of education/ engagement tools which would address concerns about education/publicity. The behaviour change pilot program proposed in the RDMP may partly address concerns raised about limited community involvement. Segments of the community would be involved in developing future residential programs. Refer comment on rainwater tank rebates, water recycling, expenditure, current practice in other jurisdictions and drought level of service above.
14	D22/20449	12/09/2022	In support of: • Long term RDMP to assist long-term future water supplies and defer new water sources. • Continued rainwater tank rebates. • Smart metering. • Water loss management across all LGAs. • Expansion of recycled water.	Refer comment on rainwater tank rebates and recycling above.

Submission - Ref No.		Date received	Themes / summary	Response from Rous
15	D22/20450 (Second submission)	12/09/2022	Comments: • Against reduction in rainwater tank rebates. • Rous needs to make comment on regional human population targets, as recognition of total consumption and influence on demand management planning.	Management of growth in the region is the responsibility of the NSW Government and local councils rather than Rous as a single purpose water supply authority. Refer comment on rainwater tank rebates above.
16	D22/20466	12/09/2022	Comments: • In support of reducing water demand and addressing leaks. • Rainwater tanks should be a condition consent of all developments and used to encourage greater awareness around water efficiency. • Prioritise water loss management and leaks. • In support of revisiting demand predictions following the impacts of the floods. • Dunoon Dam is a risk to First Nations sites and Koala habitat.	Support of proposed demand management initiatives is noted. Refer comment on rainwater tank rebates above. It is acknowledged that the floods may impact on the region's population. Demand forecasts will be reviewed by Rous and will be updated in accordance with the Rous Future Water Project 2060 actions with more accurate data collected through the RDMP implementation.

Submission - Ref No.		Date received	Themes / summary	Response from Rous
17	D22/20467	12/09/2022	Comments: • Public exhibition period was too short with limited publicity. • Co-design approach to demand management - people or community are equal partners in design, with decision-making power. • Concerns around phasing out rainwater tank rebates based on the experience of one drought, 2019-2020. • Accompany rebate program with robust engagement through smart-metering or workshops. • Encourages co-design approach for tank sizing, rebate amount and education program. • Concerned that only high-water using businesses are targeted in the SWPP. • Encouraging a co-design approach to non-residential water saving programs and not solely focusing on high water users. • Co-design approach to education role including reflecting this in the position title. • In support of smart metering but is seen as afterthought in the RDMP.	The behaviour change pilot program proposed in the RDMP may partly address concerns raised about limited community involvement. Segments of the community would be involved in developing future residential programs. Refer comment on rainwater tank rebates above. The RDMP proposes the expansion of the Sustainable Water Partnership Program to a wider range of businesses, not just the highest water users. Smart metering is a key component of Rous' demand management program for its customers and has also been implemented by Ballina Shire Council and a pilot program has been undertaken by Byron Shire Council as discussed in the Rous background information. Rous has committed to working with the constituent councils to encourage implementation of smart metering across the region.
18	D22/20469	11/09/2022	Comments: • Supports incentives for rainwater tank rebates. • Supports water loss management. • Supports smart-metering and increased water literacy. • Supports diverse water sources. • Supports consideration of long-term sustainability, cost effectiveness, environment and indigenous rights.	Support of proposed demand management initiatives is noted. Refer comment on rainwater tank rebates above.
19	D22/20472	11/09/2022	In support of: • Continuation and expansion of rainwater tank rebates. • Smart-metering and leakage management. • Water literacy including for school children. An extra dam is destructive and futile.	Support of proposed demand management initiatives is noted. Refer comment on rainwater tank rebates above.

Submission - Ref No.		Date received	Themes / summary	Response from Rous
20	D22/20473	11/09/2022	In support of: • Continuation of rainwater tank rebate. • Use of spring water. • Smart metering. • Recycled water for potable use.	Support of proposed demand management initiatives is noted. Refer comment on rainwater tank rebates and water recycling above.
21	D22/20480	11/09/2022	In support of: • Recycled water. • Encourage rainwater tanks. • Avoiding Dunoon Dam proposal. • Improving water delivery infrastructure. • Education.	Support of proposed demand management initiatives is noted. Refer comment on rainwater tank rebates and water recycling above.
22	D22/20481	11/09/2022	Areas to continue or improve: • Water loss management and leakage reduction. • Recycled water. • Increased tank rebates. • Smart metering. • Community acceptance of water restriction levels. • No new dam.	Support of proposed demand management initiatives is noted. Refer comment on rainwater tank rebates, water recycling and security of supply and drought level of service above.
23	D22/20482	11/09/2022	In support of: • Adoption of the demand management plan • Expanded rainwater tank rebates. • Education. Water recycling is becoming cheaper.	Support of proposed demand management initiatives is noted. Refer comment on rainwater tank rebates and water recycling above
24	D22/20483	11/09/2022	Comments: • In support of recycling wastewater, redirecting greywater to toilet systems and water capture. • Highlights that large corporations would be involved in the building of a new dam, leaving locals out.	Refer comment on water recycling above
25	D22/20484	9/09/2022	Technology and intelligent thinking is enough to avoid the dam.	Noted

Submission - Ref No.		Date received	Themes / summary	Response from Rous
26	D22/20485	11/09/2022	In support of: • Measures to help water supply and a researched RDMP. • Rainwater tank rebates. • Smart-metering, recycled water, education. • Demand management initiatives to avoid the Dunoon Dam. • Obtain advice from the Institute for Sustainable Futures.	Support of proposed demand management initiatives is noted. Refer comment on rainwater tank rebates and water recycling above.
27	D22/20486	11/09/2022	Comments: • No more dams needed if everyone has a rainwater tank. • Fix the leaks and water wastage. • People need to be educated. • No garden watering without a rainwater tank.	Support of proposed demand management initiatives is noted. Refer comment on rainwater tank rebates above.
28	D22/20487	11/09/2022	Comments: • Does not want taxpayers money invested in a dam. • In support of water efficiency, shorter showers and using tanks. • Seeking more communication between LGAs and Rous and more working together. • Recycled water as part of the solution.	Support of proposed demand management initiatives is noted. Refer comment on rainwater tank rebates and water recycling above.

Submission - Ref No.		Date received	Themes / summary	Response from Rous
29	D22/20488	12/09/2022	In support of: • Rous prioritising demand management and protection of environmental and cultural heritage rather than considering the proposal for the Dunoon Dam. • Engaging with constituent councils to reuse reclaimed sewage water for public toilets, watering public parks and encourage commercial business connections. • Engaging with councils to create high grade reclaimed water as potable water at each council's sewage plants to ensure local supply during natural disasters. • Subsidising rainwater tanks by rebates. A) New subdivisions to be required to have rainwater tanks and councils to encourage retrofitting. B) Rainwater tank for alternative drinking water supply. • Rous working with councils to fund leak detections. • Desalination plants. • Considering recent State of the Environment Report as a guiding document.	Support of proposed demand management initiatives is noted. Refer comment on rainwater tank rebates and water recycling above. The Rous Future Water Project 2060 includes investigating desalination options as a new water source.
30	D22/20489	12/09/2022	In support of: • Use of recycled water. Against: • Dunoon Dam and resulting habitat loss, heavy traffic and disruption to commuters.	Refer comment on water recycling above.

Submission - Ref No.		Date received	Themes / summary	Response from Rous
31	D22/20490	12/09/2022	Comments: The plan does not satisfactorily meet the expectations of a demand management plan because it does not scope the potential for: • Improved water efficiency. • Demand management options to reduce demand or quantify the reductions. • Level of expenditure. This is too small to have a meaningful impact, relative to future supply options. • Increased expenditure and a region-wide approach could increase take-up levels beyond those historically experienced. • The plan and previous response to my submission talk about a regional approach to overcome the disjointed nature of these activities. • Level of service issues not acknowledged – “a change in the level of service would result in a change in the sustainable yield by several hundred mega-litres per year.” • It is not a costed plan for investment in water efficiency and does not form a comparison with proposed supply options.	The RDMP and background documentation provide consideration of a range of options based on past experience in the region. The residential pilot program will consider measures for inclusion in the next review of the RDMP. Refer comments on expenditure, security of supply and drought level of service above. The RDMP recognises the need for effective water efficiency options and proposes pilot programs to identify these.

Submission - Ref No.		Date received	Themes / summary	Response from Rous
32	D22/20491	12/09/2022	Comments: • Put into effect all the suggestions from NSW Institute for Sustainable Futures. • Does not support phaseout of rainwater tanks. • Need to scrutinise level of service & secure yield in the Northern Rivers. • Need to consult with community around willingness to pay, and to assess whether water consumers were willing to trade off the change in level of service and the reduction in yield for the value of deferring future investment. • Rous to actively support LGAs to use purple pipes where they exist and to encourage more recycled water across the region. • In support of an ambitious and visionary RDMP.	Support of proposed demand management initiatives is noted. Refer comment on rainwater tank rebates, water recycling and security of supply and drought levels of service above.
33	D22/20492	12/09/2022	In support of: • Working with LGAs to fix leaks. • Smart meters. • Education program for residential and non-residential customers. • “Every Drop Counts Program” offered through Sydney Water - water audits in schools and hospitality sector. • Diverting SWPP earmarked for business and tourism to rainwater tank rebates, though schools and health care facilities should be supported. • Primary and secondary school education. Does not support: • Phase out of rainwater tank rebates. • Including education and aged care facilities in the same category as tourism facilities and shops for the SWPP – tourism facilities and shops should not be given water saving plans or rebates as they are able to undertake their own and should not be subsidised by Rous.	Support of proposed demand management initiatives is noted. Refer comment on rainwater tank rebates above. The RDMP includes a new education resource and facility in addition to development of education/ engagement tools which addresses comments on education programs.