

To whom it may concern,

Please accept this submission from The Gap Sustainability Initiative Inc (TGSI) to the public consultation about the proposed planning process for reviewing and replacing the Moreton Water Plan.

## About TGSI

TGSI is a charitable, volunteer-led community organisation based in The Gap, Brisbane, QLD. We partner with other local groups, residents, schools, businesses, and governmental stakeholders to promote sustainable living practices and a positive ecological environment. One of our main projects is returning platypus to Enoggera Creek, for which more information can be found here: <https://www.thegapsustainability.org/>

We'd like to raise the following issues with water management in Moreton.

### 1. Concerns about the right to extract from Enoggera Creek

We are concerned about the lack of restrictions in the licensed extraction of water from Enoggera Creek and the absence of any link between permitted water extraction on the one hand and water availability and flow on the other.

We are concerned that the size of the water allocation to licences on Enoggera Creek is unsustainable for this catchment. TGSI are aware that there are currently six water extraction licences on Enoggera Creek: Enoggera Dam, The Gap State High School, The Gap Football Club, Ashgrove Golf Course (2 licences - one to the west of Bennett Road and one to the east) and Marist College. Furthermore, we are also aware that the GPS Rugby Club ground also extracts water for irrigation (though we've been unable to identify if a licence has been issued for this) and that all riparian properties are entitled to take water from creeks for "stock and domestic purposes". In reviewing the amount of water each licence is assigned, it is clear that the extraction rights are unmetered and are effectively unlimited. We believe that having an unmetered and unlimited water extraction from Enoggera Creek is unfair and unsustainable.

We are particularly concerned about the effects of unlimited water extraction on local flora and fauna, and on people's amenity use of creeks and rivers. For example, platypus historically lived in the Enoggera Creek catchment, but recently, they have gone locally extinct. Critical to the survival of platypus is the maintenance of large pools of permanent water - for habitat and food sources - in periods of low rainfall. We believe that unlimited water extraction from Enoggera Creek has contributed to the local extinction of platypus during low rainfall periods (e.g. the Millennium drought) through the draining of large pools critical to platypus survival. This scenario will likely be replicated across Brisbane, where platypus have recently become extinct in 5 catchments, with many other species also at risk of local extinction.

Furthermore, Enoggera and other urban creeks are critical environments used by the communities that live by them. Enoggera Creek is a popular destination for naturalists, photographers, walkers, runners, and cyclists, and the Reservoir itself is also used by people fishing and swimming. Unrestricted water extraction from Enoggera Creek and its tributaries negatively impacts everyone who uses these creek areas for social amenities, and a more holistic approach needs to be taken to our shared resource.

As such, we request that the Moreton Water Plan move away from unrestricted water extraction and consider implementing the following recommendations:

1. All water extraction must be metered and licensed only - especially for vulnerable urban creeks.
2. The total permissible water extraction quantity (and each licence) to be limited to an amount that does not negatively affect the natural environment of the water source.
3. Water extraction licences restrict water extraction to times when sufficient water is present in the creek to not negatively affect the natural environment of the water source.
4. Water licences be restricted to a more reasonable timescale (eg. 10year extensions, instead of the current 100year extension in 2011) so that extraction can be reasonably modified in response to Queensland's changing climate, land use, water use and environmental requirements.

Implementing these recommendations would significantly benefit the environment of urban creeks and the people who live around them while maintaining water use for important local facilities and clubs. Furthermore, as water is a shared resource, removing licences that allow unmetered and unlimited water use would make the system fairer for everyone in QLD. (Particularly for those whose properties don't border a creek and must pay for their water).

## 2. Environmental management downstream from SEQwater-managed reservoirs

We are concerned that the licence for Seqwater reservoirs does not require licence holders to manage aquatic and riparian environments downstream from their infrastructure. Through TGSi's efforts to return platypus to Enoggera Creek, we've engaged with Seqwater regarding managing water downstream of Enoggera Reservoir to create and sustain platypus habitat. While we know Seqwater's role in managing water for flood mitigation, urban water supplies and irrigation, we have been told by Seqwater that they have no responsibility for the health of the Creek below the dam wall. While Seqwater has demonstrated that it is quite willing to work with community groups such as ours - as evidenced by environmental flows managed from Gold Creek Reservoir - we are concerned that there is no regulation that specifically requires major water managers such as Seqwater to maintain a minimum duty of care for environment and social amenity downstream of their infrastructure. Furthermore, we'd like to see enhanced requirements for Seqwater (and other major water licence holders) to consult with local communities about their concerns and desires for waterway environments and people downstream of infrastructure.

A more holistic approach to water has been adopted in other states. For example, Melbourne Water (<https://www.melbournewater.com.au>) manages water supplies while

taking significant involvement in the environments surrounding their catchments. This is a modern approach to water management and one that we would like to see Queensland adopt.

As such, we request that the Moreton Water Plan implement as part of their water extraction licence:

1. Condition imposing a duty of care on major water holders (like Seqwater) to manage dam outflows to appropriately manage the natural environment and social amenities downstream of their infrastructure.
2. The condition is that major water holders must consult with the community about this plan to ensure diverse perspectives can be included while maintaining water security for SEQ as a whole.

Moving to a more holistic water management in Moreton would benefit both the environment and the people who live near and use water resources.

### 3. Management of stormwater in urban environments

TGSI would like the Moreton Water Plan to include considerations for stormwater management in urban environments. The urbanisation of southeast Queensland has impacted water in various ways, including flooding, reducing recharge surface due to construction, and polluting water resources. As recently as 2022, significant flooding occurred within the Enoggera Creek catchment, with severe detrimental outcomes for communities that live along these creeks and the plants and animals that live within. A significant contribution to this event is the urbanisation of the environment (eg. installation of hard surfaces) which has severely reduced the open land available to absorb precipitation.

As part of the review of the Moreton Water Plan, we recommend that the effects of urbanisation on water be considered, and initiatives be implemented to mitigate their effect on people and the environment. As such, we request that the following be considered:

1. Initiatives that capture and filter stormwater before it reaches urban catchments include:
  - a. Incentivised installation of water tanks (domestic and commercial) to delay stormwater reaching urban creeks.
  - b. Minimum requirements for open land for the absorption of precipitation in urban environments.
  - c. Holders of water extraction licences are required to install water tanks or dams and prioritise water capture during large rain events.

Implementing such recommendations will benefit Queensland by reducing the magnitude of flood events while allowing the captured water to return to catchments over a longer period. Furthermore, requirements for open land may be used for public amenities, such as parks, bushland and sporting grounds. These changes may also reduce the demand on urban water supplies (e.g. tank water is used on gardens instead of town supply), and benefit urban waterways by reducing surface runoff while allowing that water to eventually return to creeks and rivers.

## 4. Consultation with indigenous communities

Indigenous communities have deep connections with land, water, biodiversity and climate. As part of the review of the Moreton Water Plan, we recommend that local indigenous communities are consulted and involved in the process and drafting of the new Moreton Water Plan.

## 5. Specific requests for the Enoggera Dam

In light of TGSi's platypus rewilding project in Enoggera Creek and given the importance of the Enoggera Dam for the creek's health and biodiversity, we would like to request that the Moreton Water Plan consider and research the following points:

1. Given the Enoggera dam's age and design, we'd like options investigated for establishing ecologically sustainable environmental flow from the reservoir to the creek. This would entail the release of water from the dam's surface, rather than the bottom, to ensure the discharge of oxygenated water at the appropriate temperature into the creek. We recommend the Moreton Water Plan to assess and implement viable strategies that align with the infrastructure's characteristics, fostering an environmentally conscious and effective approach to water management.
2. Given the imminent challenges posed by climate change, particularly during periods of drought, it is crucial to evaluate the available water in the dam for sustaining Enoggera Creek's biodiversity, including the prospective Platypus population. We propose that the Moreton Water Plan incorporate modelling for various climate scenarios to comprehensively assess the dam's water capacity concerning environmental flows. This proactive approach will enable informed decisions to ensure the continued well-being of the ecosystem amid changing climatic conditions.

We appreciate the opportunity to raise our concerns about water management in Moreton. Should you wish to speak to us about these concerns, you can contact us at: [info@thegapsustainability.org](mailto:info@thegapsustainability.org)

Kind regards,

Dr Andrew Turley on behalf of The Gap Sustainability Initiative