NSW Dept Climate Change, Energy, the Environment and Water

Sydney NSW 2000

Thursday, 5 December 2024

Sent electronically [wspconsultation@dpie.nsw.gov.au](mailto:wspconsultation@dpie.nsw.gov.au)

**Landholder submission rejecting prescribed wetlands**

As a landholder in the Gwydir Valley, we have prepared this submission in response to the Draft Water Sharing Plan for the Gwydir Unregulated Water Sources 2025.

We do not accept any of the newly identified 327 wetlands included in the draft plan, and do not believe that it appropriate to include any additional wetlands into the Water Sharing Plan for the Gwydir Unregulated River Sources.

**Recommendation**

**We request that wetland identification not be included as a component of any Water Sharing Plan regulated or unregulated now or at any time into the future.**

We cannot support the methodology used for the identification of a wetland when the process has been derived from a desk top study and has not been supported through any consultation with landholders, and where there has been no ground truthing.

Although we do not support the creation of wetlands on private land, if the government wishes to identify any new wetlands as a stand alone process, unrelated to any Water Sharing Plan, the process must include individual consultation will all landholders likely to be impacted by the identification of a wetland, this includes all neighbouring landholders. In addition, there must be appropriate ground truthing to justify the wetland classification.

We are not confident that the only restrictions to prescribed wetlands would be that there would be no new works or trades allowed. Before we can accept this statement, we would need evidence to support this position. Any decision that impacts what we do on our landholding has the potential to cause significant economic impact to our business and if pursued would need to be compensated.

The Draft Gwydir Unregulated Water Sharing Plan prescribed wetland map includes the following site which is not a wetland.

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| **ObjectID** | **Lot/DP number** | **Explanation as to why it is not a wetland site** |
| 2941 | Lot 2 DP1213585 | This section is a regulated river system which we access regulated water from Copeton Dam and have done here since before the dam’s construction. This section is an anabranch which is known as Cowell Lagoon and is a part of the Gwydir River.  Any restrictions for new works or trades would be costly to our business and cannot be supported. |
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Sincerely,

Address: