

20 June 2025

NSW Independent Pricing and Regulatory Tribunal
2-24 Rawson Place, Sydney
NSW. 2000

Subject: Submission on Draft Report – Sydney Water Prices 2025–2030

Dear IPART Tribunal Members,

We are writing to express our concerns regarding the draft decisions outlined in your May 2025 draft report on Sydney Water's pricing for the 2025–2030 determination period, particularly as they relate to sewer overflow management and stormwater infrastructure investment, and their implications for Sydney's urban rivers.

While we acknowledge IPART's efforts to balance affordability and efficiency, we are deeply concerned that the proposed reductions in capital and operating expenditure, especially the 35% cut to Sydney Water's capital program, will significantly undermine the protection and restoration of the Sydney's urban rivers. Such a large reduction in expenditure for a relatively small reduction in a typical household bill relative to the Sydney Water proposal (\$1.32 per week) seems exorbitant given expected population growth¹, the growing impacts of climate change, aging infrastructure, and the need to meet ever-tightening environmental standards.

If IPART's draft proposal is adopted as it currently reads, we fear the following impacts for the Sydney's urban rivers and their many communities:

- Higher incidents of wet weather overflows into Sydney's Urban Rivers that would have otherwise been avoided under Sydney Water's Pricing Proposal
- Reduction or cessation in concrete channel bank naturalisation by Sydney Water
- Reduction in Sydney Water's adoption and maintenance of environmental stormwater assets that help to protect rivers like the Cooks River and the Parramatta River from urban stormwater runoff.

We are concerned that the proposed reductions to sewer renewal upgrades pose serious risks to downstream water quality and public health. IPART's proposed \$700 million cut to proactive sewer network renewals will likely result in increased overflows and pollution events, undermining the benefits of water-sensitive urban design and catchment restoration efforts delivered by the Cooks River Alliance and Parramatta River Catchment Group member organisations, state government agencies, and community efforts.

For example, Sydney Water has undertaken bank naturalisation works on sections of the Cooks River and its tributaries that were subject to concrete channelisation during the mid-20th century. While well intentioned, this channelisation has had several unintended consequences, including severe environmental degradation of the river system, and significant loss of human health and well-being outcomes for local

¹ Expected to grow by almost 2 million by 2041; [Population projections | Planning](#)

communities that a natural urban river would have provided^{2,3}. To address this, Sydney Water has been undertaking bank naturalisation of aging concrete channelisation. We fear that if IPART's draft decision to cut Sydney Water's capital program by 35% is carried, programs like bank naturalisation will be significantly slowed or even suspended. This is particularly problematic given that the vast majority of channelised sections are in the upper catchment, in suburbs disproportionately affected by a lack of green-blue infrastructure⁴ and more vulnerable to the impacts urban heat⁵.

Adding to our concerns is the following excerpt from chapter 4 of the draft report:

“A \$21 million step increase for stormwater remediation works was proposed. This is an ongoing program which includes gross pollutant trap cleaning, channel and pipe desilting, silt and debris removal, reactive and emergency repairs, some bush regeneration and weed removal.

Sydney Water underspent in the current period due to wet weather and COVID-19. It also has newly defined KPIs.

AtkinsRéalis recommended an upper range of \$10 million and lower range of \$5 million, finding much of the increase is for works that should be in the base year with other components covered by the trend increase. Our draft decision is to accept the lower range..”

Urban stormwater is the leading cause of the degradation of Sydney's urban rivers due to its polluting and hydrological impacts on receiving waters. It is well known that stormwater management is thus far a mostly overlooked yet otherwise critical component to effective Integrated Water Cycle Management⁶ in NSW. If not given greater urgency, it will likely have significant implications not just for the health of our urban rivers, but also the resilience of Greater Sydney's communities⁷. Consequently, such a significant reduction in Sydney Water's recommended budget seems at odds with current state government policy on urban water cycle management, appearing to continue the legacy of underestimating the importance of investing in long-term asset management and renewal in building healthy, resilient communities, whilst ignoring recent signs of underfunding (e.g. beach debris balls⁸) and the growing challenges associated with urban growth and densification.

In summary, Sydney's urban waterways are already under pressure from population growth, ageing infrastructure, and climate change. Reducing funding for essential infrastructure and environmental programs at this time for a relatively small benefit will only exacerbate the status quo, likely leading to:

- Increased frequency and severity of sewer overflows
- Continued degradation of water quality in urban creeks, rivers, and estuaries

² NSW Ministry of health. (2020). *Healthy Built Environment Checklist – A guide for considering health in development policies, plans and proposals*. St Leonards, NSW.

³ NSW DPE. (2023). *Framework for Valuing Green Infrastructure and Public Spaces*. [Valuing green infrastructure and public spaces | Planning](#)

⁴ NSW Government. (2025). *About Green and Blue*. [Green and Blue](#)

⁵ NSW DPE. (2023). *Average tree canopy cover, heat vulnerability index and urban heat island of suburbs in greater Sydney*. NSW Department of Planning Environment, Sydney.

⁶ NSW Government (2025). *NSW Integrated Water Cycle Management Framework – Best practice guide*. NSW Department of Climate Change, Energy, the Environment and Water. Parramatta: [NSW Integrated Water Cycle Management Framework](#).

⁷ NSW Water Strategy, Priority 6: Support resilient, prosperous and liveable cities and towns - [Priority 6 | NSW Government Water](#)

⁸ EPA NSW (2025). *Beach debris ball investigation*. [Beach debris ball investigation | EPA](#)

- Missed opportunities to improve stormwater management in Sydney Water catchments (including the Cooks River and the Parramatta River)
- Negative impacts on biodiversity, public health, and community amenity
- High incidents of flooding, impacting on public safety, local economies, and affordability through issues such as increased insurance premiums.

Given that Sydney Water's extensive community, customer and stakeholder engagement has identified a strong desire to protect our urban waterways, and that our own engagement has elicited a similar outcome, we strongly urge IPART to reconsider its draft decisions and ensure that Sydney Water is adequately resourced to meet its environmental obligations, urban stormwater management services, and community expectations. Specifically, we recommend that IPART:

- Reconsider capital expenditure reductions that affect environmental performance (e.g. sewer overflow abatement and bank naturalisation programs), growth infrastructure, and resilience (flood mitigation and investment in blue-green infrastructure). In many cases, these cuts appear to present a false economy delaying necessary investment at the cost of future system failure and expensive retrofitting (noting that the models used in IPART's draft report have received criticism for inadequately considering broader public value and environmental outcomes).
- Maintain and build on cost-reflective stormwater pricing to support long-term planning and delivery that takes into account environmental and socio-economic outcomes.
- Establish clearer funding protections for stormwater investment within Sydney Water's capital program to ensure it is not continually deprioritised based on conventional increasingly outmoded heuristic cost-benefit models.
- Ensure dedicated funding for stormwater asset maintenance, including for engineered infrastructure such as GPTs, sediment basins, and stormwater channels, and natural assets.

Thank you for the opportunity to provide feedback. We would welcome further engagement on this matter and look forward to IPART's final determination in September 2025

Yours sincerely,



Dr Andrew Thomas
Executive Officer
Cooks River Alliance.



Alexi Gilchrist
Coordinator
Parramatta River Catchment Group

