



City of Parramatta Council
Attn: Catchment Management Team
Subject: Flood Big Ideas
PO Box 32, Parramatta NSW 2124

Sent via: catchment@cityofparramatta.nsw.gov.au

**SUBMISSION FROM THE BARAMADAGAL DARUG TRIBAL GOVERNING COUNCIL
RESPONSE TO: FLOOD BIG IDEAS**

10 DECEMBER 2025

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Introduction

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We make this submission as the Baramadagal Darug Tribal Governing Council, the Traditional Owner group of Parramatta, also known as Baramada. Our stories, responsibilities, languages, waterways, and ceremonial practices are bound to this river and its tributaries.

For clarity, in this submission the terms “Traditional Owners” and “Traditional Custodians” are used interchangeably. Both refer to the Reid Goldspink family, who are Baramadagal Darug people and who hold cultural authority, responsibilities, and ancestral connection to this Country. We do not purport to speak for all members of our broader family group, but speak with and as those connected with the Baramadagal Darug Tribal Governing collective, who carry cultural responsibilities within our lineage for water law / lore, terms which are also used interchangeably. We do not purport to speak for other family groups of the Darug-speaking peoples, and we respect those with traditional and ongoing connection to Country who carry their responsibilities with care.

The Parramatta River is not infrastructure or a flood hazard. It is Country, a living ancestor, a knowledge system, a migration path for the eels, and a source of cultural identity for Baramadagal and Darug families since time immemorial.

Despite recent NSW Government commitments to embed First Nations knowledge in planning, major structural gaps remain. For example, the NSW Government’s Flood Risk Management Manual (2023) does not mention Traditional Owners at all in its extensive section outlining roles and responsibilities. This omission is particularly concerning given that the Manual was released around the same time as the Connecting with Country Framework (2023), which explicitly requires early and ongoing engagement with Traditional Custodians. These two streams of policy appear to have been developed in isolation, creating contradictions that directly affect flood planning on Darug Country.

At the local level, the City of Parramatta adopted its First Nations Strategy in May 2024, yet the options presented in this Flood Big Ideas consultation do not reflect this shift.

Any proposal affecting this river must respect sovereignty and embed Traditional Owner knowledge not as an afterthought, but as the foundation.

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Community Opposition to Concrete Riverbank Destruction

Members of the wider community have supported the [petition](#) launched by Simon Alexander Cook titled “Protect Parramatta’s Natural Riverbank: Change the 28 Million Dollar Concrete Plan,” raising concerns about:

- heavy concrete riverbank works
- massive excavation
- loss of native habitat
- destruction of cultural and ecological values
- the absence of First Nations-led design for Country

The petition states that the riverbank proposals erase cultural history and natural beauty and fail to embed ecological or Indigenous analysis as the basis for design. These concerns apply directly to the approaches modelled in the current Flood Big Ideas consultation.

Our Principles as Baramadagal Darug

Water is a living ancestor, not an asset. Floodplains, riparian edges, wetlands, and natural riverbank curves are expressions of a living system. As Traditional Owners, we see the river’s behaviour as knowledge, not as a problem to be fixed.

Baramadagal sovereignty is ongoing and must shape all decisions. We are not merely stakeholders. We are the Traditional Owners with custodial responsibilities for this water system.

The river’s health is the city’s flood safety. If Country is stripped of vegetation, species, river curves, and wetland buffers, flood risk worsens. Cultural care led by Traditional Owners is flood mitigation.

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Concrete is not resilience. Therefore, soft engineering, ecological restoration, native plantings, cultural flows, wetland regeneration, and reinstatement of natural systems are safer and more sustainable than concrete detention basins or weirs.

Systemic Issues with Current NSW Flood Planning Approaches

- Hard engineering is being treated as the default without transparent disclosure of discarded alternatives. Modern alternatives such as sponge city models (which use wetlands, swales, permeable pavements, and raingardens) can offer superior resilience to traditional engineering approaches and align with cultural hydrology
- Every new engineered structure makes future ecological restoration more difficult.
- Engineered interventions often shift risk rather than reduce it, disproportionately impacting lower-value or non-commercial areas.
- The Charles Street Weir proposal emphasises “moving water through quickly,” which increases erosion and transfers risk downstream.

Concerns With Current Flood Big Ideas Proposals

1. Business as usual engineering solutions furthering systemic issues of cultural and ecological erasure.
2. There is no First Nations-led cultural or ecological assessment.
3. Water flow modifications may harm eel migration.
4. Public safety cannot justify cultural erasure.

Specific Concerns with The Three Options

APPLICABLE TO ALL THREE OPTIONS:

- absence of a Cultural Waterway Impact Assessment (refer to [Aboriginal Waterways Assessment – Murray Darling River Indigenous Nations](#) for consideration).
- no transparency about alternative options.

LOYALTY ROAD BASIN, DUNDAS:

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- disconnection of natural water pathways
- removal of habitat and vegetation
- Too much reliance on man-made detention basins instead of natural, cultural and ecological flood solutions.
- absence of cultural hydrology analysis — meaning there has been no assessment of Traditional Owner water-knowledge, seasonal flows, eel migration patterns, cultural floodplain function, or the cultural responsibilities attached to this river system.

MCCOY PARK BASIN, TOONGABBIE CREEK:

- reshaping of creek-line without Traditional Owner approval
- risks to cultural flows
- lack of an alternatives assessment

CHARLES STREET WEIR MODIFICATION:

- unknown risks to eel movement
- potential disturbance of sediment beds holding ecological memory
- habitat fragmentation
- intensified engineered control at a spiritually significant site
- no disclosure of non-engineered or cultural alternatives

COMPARATIVE TABLE:

We provide a table of comparison which shows our community-thinking process in culturally evaluating the three options currently available:

	Option 1	Option 2	Option 3
	Loyalty Road Flood Detention Basin, North Rocks	McCoy Park Flood Detention Basin, Toongabbie	Charles Street Weir and Barry Wilde Bridge, Parramatta River in the CBD
New Infrastructure Requirements	No major new infrastructure required.	New major infrastructure required. Raise existing soil and turf levee walls by 1m. Additional 2m high levee walls to be built on the industrial area side of McCoy Park.	New major infrastructure required. Charles Street Weir to be removed and replaced with 4.8m wide weir with automatic flood gates. Existing Sydney Water pipeline to be installed below river bed (presuming this is a trenchless installation which

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			would be best practice and low environmental impact).
Flood Mitigation Philosophy	Reduced diameter of tunnel to half existing size leading to more retention of flood volumes and subsequent slower release of flood water. No works to the flood levels downstream required.	Increasing existing levee height by 1m and new walls 2m high walls in industrial area to increase temporary flood detention within the McCoy Park area. Increased detention time and slower release of water volume.	Increasing weir width leading to increased discharge rate of flood water through the weir will increase speed and volume of floodwaters to transfer through the CBD.
Community Impact	Reduced accessibility through tunnel, half current diameter. Dry weather pedestrian access only.	Reduced accessibility to park (manageable through design).	Improved access to pedestrians and cyclists. 1970s Barry Wilde Bridge, fountain, and light display will remain in place.
Environmental Impact	To understand the environmental impact, we need to see the flood modelling with the tunnel reduction compared to the existing state. No increase to the detention area makes us question how far the flooding detention extends will span upstream of the tunnel.	Impact to the existing gum trees near the raised levee may be a concern. Again, need to see flood modelling with comparison to existing state to fully appreciate the significance of the upstream impacts. We suggest minimal impact expected as levee and new walls would (hopefully) keep flooding bound to the existing detention area.	Downstream impact is the biggest concern due to increased volumes and velocity of flooding through the CBD due to weir widening. How far until erosion protection downstream is needed or does the erosion risk dissipate enough by the time flows exits the concrete lined section?
Flood Reduction, CBD (cm)	19	5	66
Flood Damage Cost Reduction (50 yr horizon)	\$ 19 M	\$ 16 M	\$ 23 M
CAPEX	\$ 1.1 M	\$ 31.6 M	\$ 18 M
OPEX	\$ 10 K	\$ 50 K	\$ 100 K
Benefit : Cost	16.3:1	0.5:1	1.2:1
Opportunity for Cultural Improvement	This option presents as a cheap / quick fix from a technical perspective but how to do this well for Country needs further investigation and understanding of the upstream impact caused by flood retention. We suggest that Council proceed with Traditional Owner engagement to identify how we could collaboratively improve this option.	Unsure that this will be the favourable solution looking at the above (red, yellow, green light comparison). There may be more opportunity here to raise public awareness of culture here if the park is used frequently. We suggest that Council proceed with Traditional Owner engagement and see how we could collaboratively improve this option.	This option looks like the best opportunity to uplift our culture within the community by drawing focus on the eel's significance to place. Potential pathway forward together could include a focus on improving eel passage and drawing community attention to the eel's cultural significance to the area. Could do this by sharing some eel stories across the footpath so people passively learn as they walk the bridge and read, coupled with a seating area and

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			<p>knowledge board to explain the eel passage incorporation into the design and show some technical design drawings.</p> <p>Something along these lines could work towards achieving a genuine two-way knowledge exchange and relationship building between Traditional Owners and Council on display for all community to appreciate.</p> <p>Again, Traditional Owner engagement suggested to actually start the dialogue.</p>
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Preferred Option: Rejection Of All Three Concepts in Their Current Form

None of the options meet cultural, ecological, or sovereignty-based standards at this point in time.

A Culturally Grounded Alternative Pathway

The design must be developed in alignment with Councils 'Connecting with Country Framework' (2023), which explicitly requires early and ongoing engagement with Traditional Custodians. The new approach could include:

- wetland-based retention
- restoration of natural floodplains
- native riparian vegetation
- eel passage designs
- soft engineering
- cultural flow and seasonal hydrology mapping
- water-sensitive urban design
- reinstatement of meanders and habitat edges
- genuine collaboration with Baramadagal as pre-existing water governance authority

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Next steps

We respectfully ask that the Review of Environmental Factors (REF) Report be released to assist in the community consultation phase prior to detailed design and that a copy be provided to us by email directly.

Conclusion

The Parramatta River is a living ancestor. Flood safety must not come at the cost of cultural survival and ecological health.

We urge Council to commit to a Baramadagal-led process that respects sovereignty, cultural water knowledge, and ecological intelligence.

Submitted by:

Baramadagal Darug Tribal Governing Council

www.baramada.com

With specific acknowledgment to Community members: Julie Christian, Jayne Christian, Brienne Fisher and Kara Brussen who contributed to this submission.

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