



Stormwater

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Project Manager – SPP Healthy Waters
Water Quality and Accounting
Department of Environment and Resource Management
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Dear Sir/ Madam

Thank-you for the opportunity to provide the attached submission on the draft *State Planning Policy for Healthy Waters 2009* and associated documents.

Please contact Sarah Walker on [REDACTED] should you require further information or clarification on this submission.

Regards,

Sarah Walker
President

Submission on the draft State Planning Policy for Healthy Waters and associated documents by the committee of the Stormwater Industry Association of Queensland

The State Planning Policy for Healthy Waters and associated documents will provide a key mechanism for protecting and achieving the environmental values of waterways. It will provide enforceable, regionally consistent requirements for stormwater management, which will assist in providing confidence in development assessment across Queensland. The inclusion of hydrologic management and erosion and sediment control are key aspects that will assist in protecting environmental values. Adoption of the draft as a State policy is strongly endorsed following consideration of the points outlined in this submission.

1. Enabling factors

While the policy is a critical step in moving forward with protection of the environmental values of waterways, comprehensive research has shown that eight enabling factors are required for the mainstreaming of urban stormwater management or Water Sensitive Urban Design (Brown and Clarke, 2007). These are:

1. Socio-political capital
2. Bridging organisations
3. Trusted and reliable science
4. Binding targets
5. Accountability
6. Strategic funding points
7. Demonstration projects and training
8. Market receptivity

The policy provides one of these factors – binding targets. The presence of the other factors varies across Queensland and there is a strong need for the Queensland Government to facilitate these if sustained change in industry practice is to be achieved across the State.

A critical role for State Government is increased investment in capacity building, particularly in urban growth areas outside of South East Queensland. This is to assist industry and local government understand the philosophy, science and technology so the objectives can be complied with in an accurate and cost effective manner, and to support the necessary behavioural and organisational changes.

2. Integrated solutions

Restricting the policy to stormwater and wastewater components of the water cycle neglects opportunities to effectively and efficiently protect the environmental values of waterways. There is a need for the Queensland Government to facilitate integrated water cycle management through an integrated and overarching framework that recognises that solutions which address multiple issues can maximise public outcomes. The State Planning Policy for Healthy Waters should be a key mechanism in such a framework by requiring water supply associated with developments to be planned, designed and managed to protect the environmental values of waterways. It should be explicit in the role that integrated water solutions, such as stormwater harvesting can play in helping to protect environmental values, while achieving water supply benefits as required by the Queensland Development Code. Correspondingly, a lead agency should be identified to facilitate the organisation, funding, championing and achievement of integrated water management outcomes.

2. Waterway corridors

In preparing Urban Watercycle Management Plans and Stormwater Management Plans, local governments need to be supported by the SPP in planning for the establishment and rehabilitation of waterway corridors. Such works can and must be included in appropriate Management Plans and Plans for Trunk Infrastructure. The focus on water itself tends to limit efforts to limiting certain

pollutants (those that are easily quantified in current guidelines) without a more holistic approach to catchment management in the role of managing impact on waterways. The management of total load and total volume will go close to achieving the environmental values but we may still fail to preserve our ecology without protecting and enhancing the riparian buffers.

New and existing development alike benefit from the ecological services provided by our riparian corridors often external to the urban footprint but nevertheless impacted heavily by increasing population. The recent case Maroochy Shire Council vs FKP Residential Developments provides some basis for requiring new development to not only manage impact on site, but to also make a meaningful contribution to managing those systems impacted by growth which are external to the site.

3. Climate change

The policy requires the impacts of climate change to be considered in managing water quality. However, the policy and guideline provide very little requirements or guidance on how this is to be addressed. Further guidance on what climate change impacts should be considered and how this should be undertaken is needed.

4. Terminology

Reference is made throughout the policy and associated documents to “water quality”, “water quality objectives” and “stormwater quality” management. The use of these terms does not reflect the intent of the policy, that being stormwater management to protect the environmental values of waterways, and that the full suite of stormwater objectives includes hydrologic management objectives.

The use of these terms throughout the document must be reviewed and alternatives such as stormwater, stormwater management, or stormwater related objectives be used instead. This can be qualified or distinguished from stormwater management for other purposes such flooding by noting “stormwater management for protection of environmental values of waterways” or similar.

Note that Figure 1 of the State Planning Policy Guideline interprets stormwater management in relation to the policy as restricted to stormwater quality. This needs to be updated.

5. Role for land use planning and offsets

The use of land planning to protect waterways is supported. Local councils should, as part of the development of Urban Stormwater Quality Management Plans, establish a clear relationship between water quality objectives in receiving environments and site discharges. This should identify if water quality objectives can be met in a catchment. There should be consideration as to whether the design objectives will achieve the protection required for High Ecological Value streams, and if not, what objective should be in place or other measures to achieve this.

Clarification is required in the policy, code and guideline as to when offsets are required. It is not clear if offsets are required for High Ecological Value streams only or streams of all protection levels. It is also not clear if offsets apply to stormwater discharges, as well as wastewater discharges. Some description of the offsets policy may assist in understanding the intent.

Achievement of the water quality objectives would not necessarily “avoid release of contaminated stormwater” under all storm conditions. Application of best practice targets may lead to either a net increase or decrease in pollutant loads compared with existing catchment conditions. Where targets lead to a net increase (e.g. when developing a forested catchment) it is unclear if, under the policy, offsets are required.

6. Information sources

It is important to clearly reference relevant support material to ensure compliance and uptake. A number of key documents are missing from Appendix 2 of the Guideline. It is strongly recommended the following are included:

- Conceptual Design Guidelines for Water Sensitive Urban Design (Water by Design, 2009)

- Best Practice Erosion and Sediment books (International Erosion Control Association, 2008)
- Road Drainage Manual (Main Roads) should be included in the Statewide resource documents.

The International Erosion Control Association Erosion and Sediment Control books are strongly supported.