



Stormwater

INDUSTRY ASSOCIATION
OF QUEENSLAND INC.
IA. 173 66

SIA Secretariat
PO Box 1221
Burwood NSW 1805
siaqld@stormwater.asn.au
ABN 49 031 103 834

Dan Spiller
Acting Principal Executive Director
Queensland Water Commission
PO BOX 15087
City East Brisbane QLD 4002

Dear Mr Spiller

Re: Submission on South East Queensland Water Strategy

The *South East Queensland Water Strategy* (2009), prepared by the Queensland Water Commission, aims to guarantee a responsible level of water supply to support the requirements of the region. It provides a range of demand management and alternative water sources that are expected to meet South East Queensland's water supply requirements to 2050 and beyond. The Queensland Water Commission has requested public comment on the strategy.

The Stormwater Industry Association is an industry organisation that encourages innovative and sustainable policies, standards and practice technologies for stormwater. As such, it is appropriate that the Association provide a response to the Queensland Water Commission on the Strategy highlighting how stormwater can assist in providing the region's water supply.

The Stormwater Industry Association acknowledges the strategy is a positive step forward in securing integrated and sustainable water supply for South East Queensland. It is recognised that the Queensland Water Commission has reflected on the comments previously provided by the Association as demonstrated in a number of ways, including the commissioning of a study on the potential of stormwater harvesting to meet supply, quality and flow objectives¹, and the inclusion in the strategy of stormwater as a local water supply alternative to rainwater. However, the Association believes that the Queensland Water Commission should do more to lead and facilitate the uptake of stormwater harvesting for water supply and the environment.

The following comments are provided:

- The strategy relies mainly on dams, weirs and desalination for our water supplies, with desalination underpinning future water security. Diversity in the number and type of supplies provides a greater level of redundancy. Stormwater harvesting can be a viable and cost effective alternative water supply at the development scale, as demonstrated in the Queensland Water Commission published study (Bligh Tanner and DesignFlow, 2009).

The use of stormwater is limited in the strategy to a local supply alternative to rainwater for meeting the Queensland Development Code requirements and reducing demand for grid water. Further investigation into the potential of stormwater harvesting to supply water beyond the Code requirements in order to offset future desalination plants is required and strongly encouraged. In the short term, a rapid assessment of the potential for stormwater harvesting across South East Queensland should be undertaken by identifying and investigating priority areas, including those in the urban area that drain to high ecological value waterways. This will complement the "longer" term research being undertaken by the Urban Water Security Research Alliance on stormwater harvesting, including the potential to store stormwater in aquifers and the sewerage system. The Stormwater Industry Association are fully supportive of Research and Development initiatives discussed in the Strategy.

¹ Bligh Tanner and DesignFlow, 2009, Stormwater Infrastructure Options to Achieve Multiple Water Cycle Outcomes by Bligh Tanner and DesignFlow, Queensland Water Commission, accessed via <http://www.qwc.qld.gov.au>

- The use of rainwater tanks and stormwater harvesting for only 7 percent of the total South East Queensland water demand appears low. The assumptions underpinning the water saving target should be reviewed and a compliance audit of actual water savings undertaken.

A stretch target would encourage innovative thinking, research and development of stormwater harvesting and rainwater supply options, and should be considered for new developments where there is potential to significantly the water savings target and assist in meeting stormwater objectives for protection of environmental values.

- Regulatory impediments to stormwater harvesting should be quickly identified and resolved by the Queensland Government.
- The Strategy recognises the need to manage water on a total water cycle basis, with a guiding principle being the consideration of environmental, social and economic factors in water planning. Evaluation of water supply options should include the monetary value of benefits from stormwater harvesting, such as reduction in nutrient loads to receiving waterways, and the monetary value of environmental costs, such as energy requirements of desalination. It does not appear apparent in the method that these have been considered.
- The Australian and Queensland Governments are applauded for committing funding towards projects such as the South Bank Stormwater Harvesting and Recycling Centre. Consideration should also be given to making available cost savings from delaying infrastructure as incentives for sustainable local water supply projects.
- The basis and sensitivity of key assumptions in the strategy that have been used to make key decisions are often not clear and should be made apparent. For instance, the communities expectations re water restrictions.

The Stormwater Industry Association are keen to work with the Queensland Water Commission to enhance the role of stormwater harvesting in meeting the challenge of supplying water to the region in an economic and sustainable manner. Please contact Sarah Jones on 0403 292 506 to discuss opportunities to partner with the Stormwater Industry Association to progress stormwater harvesting.

Regards

Sarah Jones
President
Queensland Stormwater Industry Association
Ph: 0403 292 506