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Michael Brodie
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Re: UrbanGrowth NSW Sustainability Targets

Please find a submission from Stormwater NSW on the Sustainability Targets recently published by UrbanGrowth NSW.

Stormwater NSW is a peak industry association with membership including most of the councils in the Greater Sydney Region, as well as numerous consulting and manufacturing companies. The aim of Stormwater NSW is to enable local practitioners and the broad community to learn about available stormwater management and quality technologies. Stormwater NSW is supported by the National Association and a strong network of state associations in Queensland, Victoria, South Australia and Western Australia.

Stormwater NSW commends UrbanGrowth NSW on its 2028 goal to; *Be Carbon Neutral, Water Positive and Create Zero Waste*. A key tool for achieving the water positive goal is integrated water cycle management and water sensitive urban design (WSUD), coupled with the collaboration of all levels of government with infrastructure agencies, developers and our communities.

In reviewing the proposed sustainability targets Stormwater NSW raises the following points, which we are seeking feedback on prior to the finalisation of the UrbanGrowth NSW Sustainability Targets.

1. Potable Water Demand Targets

Urban Growth NSW is requiring a “minimum 50% reduction in forecast mains potable water demand for all new projects, compared to a 2016 compliance benchmark”. It is not clear how a 50% reduction in potable mains water can be measured, or how to define a 2016 benchmark.

The Water Positive target requires developments to “capture and supply more water than they use”. Compliance with this target would require developments to:

- Supply as much non-potable water as possible from local, on-site, wastewater or stormwater reuse schemes
- Bring in potable water from Sydney Water (or other potable water supplier) to meet potable demands, and any shortfall in non-potable demands

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- Find local water users for non-potable water for which they can export more than the potable water that they bring onto site.

This last point is potentially problematic as there may not be enough non-potable supply from the site to meet the demands, there may be no local users to take the non-potable water, or the cost and size for these treatment systems maybe unsustainable.

Further to this point a well-prepared water balance model is required and UrbanGrowth NSW needs to engage with Sydney Water to assess this requirement.

2. Stormwater Quality Targets

The stormwater quality targets proposed are stretched targets, which is a significant movement beyond what most councils do and what UrbanGrowth NSW had previously driven.

Indicator	Current UrbanGrowth NSW Target used by most councils	Proposed Target
Reduction in the average annual pollutant load of gross pollutants	90%	90%
Reduction in the average annual pollutant load of total suspended solids	85%	95%
Reduction in the average annual pollutant load of total phosphorous	65%	85%
Reduction in the average annual pollutant load of total nitrogen by	45%	65%

Stormwater NSW is seeking clarification on how these proposed targets were established, and would like UrbanGrowth NSW to provide research and scientific evidence to justify why the specific targets are appropriate in NSW.

Ideally a risk based approach should be undertaken in line with that proposed by the Greater Sydney Commission and the Office of Environment and Heritage. The Greater Sydney Commission within its District Plans, has identified Sustainability Priority 1:

Maintain and improve water quality and waterway health. This priority calls for waterway health targets to use a framework developed by the Office of Environment and Heritage and the Environment Protection Authority that applies a risk-based framework in the strategic planning process to assist decisions that maintain, improve or restore water quality to help meet the NSW Water Quality and River Flow Objectives. It is essential that the NSW Government adopts a consistent approach to the management of our urban waterways. The current draft District Plans are encouraging the adoption of a risk based framework for waterways. Research shows that a risk based framework is more effective in maintaining and or improving the health of our waterways.

Stormwater NSW suggests that UrbanGrowth NSW adopts the risk-based framework in the strategic planning process to assist decisions that maintain, improve or restore water quality of waterways, so that it is consistent with the NSW Government. The adoption of this approach will also mean that UrbanGrowth NSW

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developments are meeting targets which have been specifically identified for local waterways, rather than a target which is potentially not appropriate for the local waterway and requiring excessive land-take and cost.

It is our concern that anecdotally, a significant number of the stormwater treatment systems constructed are not able to meet the targets that they were designed to meet, ie 45% reduction in total nitrogen. Key issues with these systems are that they have not been designed, constructed or maintained properly and are passed onto councils and communities as under-performing assets.

Prior to establishing on higher water quality targets and “lead(ing) environmental performance across (y)our developments”, we strongly encourage UrbanGrowth NSW to ensure that all stormwater treatment systems constructed by Landcom and now UrbanGrowth NSW since it initiated its Sustainability Policy in 2003, are meeting the water quality targets they were designed to meet. We do not see it as good or sustainable practice to say that targets are being met, while UrbanGrowth NSW has a limited role in the ongoing implementation and/or management of these systems.

Stormwater NSW would like to bring to your attention that the proposed water quality targets will require up to four times more land-take (space) to meet the targets, as compared to the current targets. As these systems are typically in open space areas, Stormwater NSW is interested to ensure that open space areas are not taken over by these systems. Rather Stormwater NSW seeks to ensure that the multiple benefits of stormwater treatment systems are well integrated into open space areas. The current targets show a lack of synergy and alignment between the targets and integrated benefits of other programs being implemented by the NSW Government and local councils. For example, there needs to be alignment between the Climate Change Adaptation Plan and the Water Sensitive City Strategy.

A well thought out Water Sensitive Strategy can help to achieve priorities and objectives under a Climate Adaptation Plan. The role of integrated water management and water sensitive urban design (WSUD) should not be underestimated in the roll it can play in mitigating the urban heat island effect across our cities.

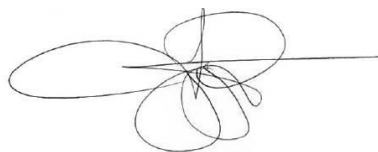
Overall Stormwater NSW believes UrbanGrowth NSW is heading in the right direction, and with further justification and collaboration with Stormwater NSW, we believe there is opportunity for UrbanGrowth NSW’s targets to be enhanced. Following this, we would welcome and advocate with our members and industry for these targets to be embedded across NSW.

We hope you can consider our comments and we welcome further discussion to further elaborate our justification for alignment.

Yours sincerely



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Co-Vice President
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