

6 November 2023



Department of Planning and Environment
By email to: coastal@planning.nsw.gov.au

Dear Sir / Madam

Re: Submission on Guidelines for Erosion and Sediment Control on Building Sites

Thank you for the opportunity to comment on the Department of Planning and Environment's updated guidelines for erosion and sediment control on building sites. I apologise for submitting our comments following the advertised closing date but hope that they may still be considered by the Department.

Background

Stormwater NSW is the leading industry group in NSW for the promotion of best-practice stormwater management. We have a broad membership base drawn from state and local government, consultancies, academia, manufacturing, civil construction and maintenance industries. Stormwater NSW works primarily through education, collaboration and advocacy.

Stormwater NSW has long acknowledged the deleterious impact of sediment and other construction litter on our receiving waterways. Since the 1990s, Stormwater NSW has advocated on behalf of its members and in cooperation with like-minded organisations like the International Erosion Control Association Australasia, to improve erosion and sediment control practices.

To this end, Stormwater NSW welcomes the Department's update of the guidelines. We provide the following comments on specific aspects of the updated guidelines.

Consolidated document

The format and readability of the updated guidelines is much improved over the current guidelines. The context of preparing and implementing erosion and sediment control plans is more logical compared to the somewhat unconnected fact sheets and scant checklist in the current guidelines.

Increased focus on site planning

Detailed site planning is fundamental to guide implementation of effective erosion and sediment controls. The increased focus on site planning in the guidelines is supported.

Litter and building waste

The current guidelines contain a fact sheet on litter and building waste for which details are not included in the updated guidelines. Whilst there are some references to 'waste' and the risks of building waste entering the stormwater system, there are no clear measures on how to contain waste.

It is acknowledged that not all waste generated on site relates to erosion and sediment controls. However, uncontained building waste such as concrete waste can still become an issue.

There are also no references to litter. Litter is uncontained waste and could end up in site runoff and/or become wind-blown and contaminate local waterways.

It is recommended that a section on litter and building waste be added that includes identifying types of waste that will be generated, how to contain and manage waste and measures to prevent waste and litter leaving the site.

Complement to the 'Blue Book'

It is important that the new guidelines complement the definitive 'Blue Book' entitled *Managing Urban Stormwater: Soils and Construction, 4th edition* prepared by Landcom in 2004. The Blue Book supersedes the existing guidelines and is recognised as industry best practice for larger sites with references to more detailed technical guidance.

More comprehensive construction-ready checklist

The checklist in the updated guidelines is much improved particularly as written in the context of checking controls that are in place rather than listing controls that should be implemented. Assigning roles and responsibilities and having site induction procedures are also welcome improvements, providing for greater accountability once works commence. The step relating to establishing stockpiles should include identifying waste stockpiles and containment areas.

Inclusion of the updated Guidelines in the standard conditions of development consent

Referencing of the updated Guidelines in the standard conditions of development consent is important. This enables councils to readily mandate the requirements in the Guidelines as part of a development consent and for the appropriate controls to be applied consistently across building sites.

I trust these comments are helpful. If you have any queries, please do not hesitate to contact me on 0403 959 463 or by email at erin@sydneycoastalcouncils.com.au.

Yours sincerely



Erin Sellers
Secretary