



Stormwater
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12 June 2013

The Hon Jeff Seeney MP

Deputy Premier, Minister for State Development, Infrastructure and Planning

Department of State Development, Infrastructure and Planning

PO Box 15009

City East, Qld 4002

Dear Deputy Premier,

Re: Submission – draft single State Planning Policy

The Stormwater Industry Association of Queensland (SIAQ) is the peak stormwater industry body in Queensland. The purpose of the SIAQ is to promote the efficient management of stormwater.

The SIAQ would like to congratulate the Queensland Government on developing a single State Planning Policy (SPP) that identifies the state's interests in planning and development. The SIAQ thanks the government for the opportunity to provide feedback on the draft SPP. Having a single SPP is important to the SIAQ and its members because it provides the industry with a clear direction and helps our association to promote efficient management of stormwater.

In this response we address two state interests:

- Healthy Waters
- Natural Hazards (to the extent that it applies to flooding)

State Interest – Healthy Waters

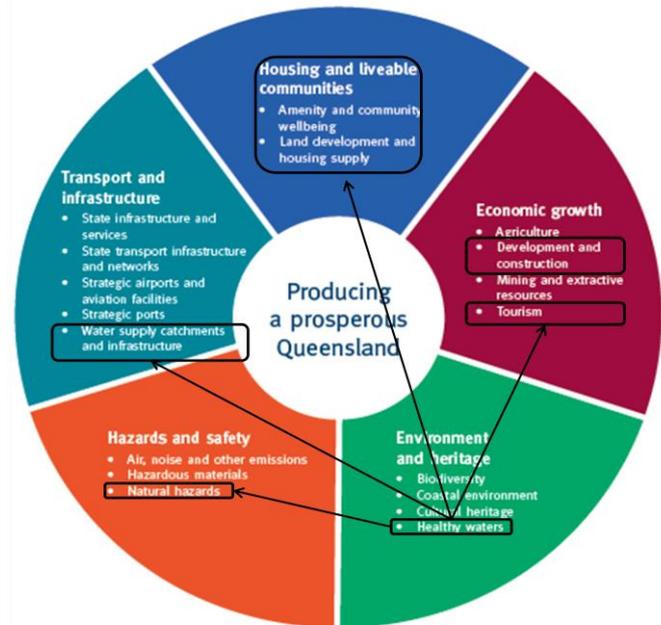
The SIAQ commends the state government for including Healthy Waters as a state interest in the SPP.

Healthy Waters are highly valued by the Queensland community. Surveys of the Queensland community (e.g. TNS Social Research, 2010 and IRIS Research, 2010) continuously show Healthy Waters to be a high, or even the highest priority for the community. Healthy Waters support Queensland's:

- economy
- tourism, agriculture and mining sectors
- natural and built environments.

The Healthy Waters state interest strongly links with the following state interests:

- Amenity and community wellbeing
- Land development and housing supply
- Development and construction
- Tourism industry
- Water supply catchments and infrastructure
- Natural hazards



The SIAQ supports the flooding components of the Natural Hazards state interest as described in the draft SPP and the SPP Guideline: Healthy Waters.

The SIAQ believes that there are a number of aspects of the Healthy Waters State Interest where simple alteration could significantly improve the final product. The following sections detail each area that the SIAQ believes has room for improvement. We also propose simple, achievable solutions.

Issue 1

The statutory component of the Healthy Waters State Interest includes a reference to the Urban Stormwater Quality Planning Guideline (USQPG). This purpose of this reference is to call up stormwater quality and quantity design objectives vital to maintaining healthy waters. The SIAQ commends the State for including this reference in the statutory component of the SPP.

The SIAQ notes however that stormwater quality and quantity design objectives comprise only several pages of the USQPG's 200 total pages. Referencing such a large document is inconsistent with the approach taken for other State Interests.

Proposed solution

The SIAQ proposes that instead of calling up the entire USQPG in the statutory component of the Healthy Waters state interest, the following be implemented:

- The stormwater quality and quantity design objectives (including loading reduction targets from Table 2.4 of the USQPG) be included in the statutory component of the Healthy Waters state interest
- Figure 2.5 of the USQPG (the climatic regions to which the stormwater quality design objective applies) be reproduced in the DSDIP SPP Interactive Mapping System and called up in the statutory component of the Healthy Waters state interest
- The USQPG continue to be referenced as guidance material only

Issue 2

The frequent flow objective (as called on by the Healthy Waters State Interest and specified in the USQPG) aims to maintain Healthy Waters by minimising the impact of small but frequent rainfall/ runoff events. It is a critical component to managing the health of high value urban streams and waterways. It applies only to developments which drain to high value waterways.

The frequent flow objective as it currently stands is difficult and in some case impractical to comply with. There is potential for the objective to be developed further to better protect waterways. There is also confusion in the industry about when the objective should be applied.

Proposed solutions

The SIAQ suggests the following three solutions be adopted.

Solution	Rationale
<p>Retain the frequent flow objective unmodified within the SPP</p>	<p>Managing small, frequent rainfall/ runoff events is an important component of maintaining Healthy Waters</p>
<p>Clarify (using the USQPG or SPP Healthy Waters Guideline) that the frequent flow objective should only be applied to high value waterways. Highlight how to determine if a waterway is of high value.</p> <p>This will allow local governments to nominate the specific waterways (or parts) to which the frequent flow objective applies.</p>	<p>To provide the industry with certainty, and ensure effort complying with the objective is focussed on appropriate waterways.</p>
<p>The Healthy Waterways Integrated Urban Water Scientific Expert Panel (IUWSEP) has identified improving and refining the frequent flow objective as a key task for the state. The IUWSEP is well placed to deliver this work but requires support (both financial and in-kind). The SIAQ recommends that the IUWSEP be supported to review, refine and improve the frequent flow objective to produce an alternate objective that is both effective and easy to comply with.</p>	<p>To ensure that a long term solution to the above issues is developed</p>

Issue 3

The previous SPP Healthy Waters 4/10 included the following statement pertaining to offsets:

“Development avoids adverse impacts on Queensland water or, where this is not feasible, adverse impacts are minimised and any residual adverse impacts offset”

This statement provided local governments with flexibility in complying with stormwater quality and quantity design objectives, including establishing offset schemes to prioritise where funding is spent in their local government. This ensures Healthy Waters are achieved in the most cost effective manner possible. A number of local governments are currently developing such offset schemes. The draft single SPP does not currently include a comparable statement nor provide local government with this flexibility.

Proposed solution

The SIAQ propose that a statement be included in the SPP Healthy Waters Guidance Material similar to that described above and previously included in Healthy Waters 4/10. Such a statement should provide local government with the flexibility to achieve the stormwater design objectives in the most efficient and cost effective manner possible, including, but not limited to applying offsets.

Issue 4

Page 18 of the Healthy Waters Guideline and the Statutory Component of the Healthy Waters State Interest both make the following statement:

“Avoids or otherwise minimises adverse impacts on the environmental values of receiving waters, arising from:

- *altered stormwater quality or flow, or*
- *wastewater (other than contaminated stormwater and sewage), or*
- *the creation or expansion of non-tidal artificial water ways, such as urban lakes.”*

The use of the word ‘or’ at the end of the first and second dot points suggests that development should choose between these three options. The intent is that development achieves all three options.

Proposed solution

Change the word ‘or’ in the first and second dots points to ‘and’.

Issue 5

Performance Outcome 5 (PO5) of the Healthy Waters Guideline states that:

'The non-tidal artificial waterway is not designed only for stormwater flow management or stormwater quality management.'

The intent of this statement is to encourage the multiple use of open space (for example using a stormwater wetland to both treat stormwater and as an aesthetic feature within parkland). This is a commendable intent.

Unfortunately, the statement as it is currently worded potentially implies that it is appropriate to use non-tidal artificial waterways (e.g. lakes) to treat stormwater. It is not appropriate to use lakes to treat stormwater.

Proposed solution

Reword PO5 to achieve the intent of encouraging the multiple use of open space without implicitly suggesting that lakes are appropriate for treating stormwater.

State Interest – Natural Hazards (flooding)

The SIAQ commends the state government for the inclusion of flooding as a Natural Hazard of State interest. Flooding is an important State interest to include in the SPP because when inappropriately managed it has the potential to negatively impact upon Queensland's:

- economy
- tourism, agriculture and mining sectors
- natural and built environments.

The Flooding component of the Natural Hazards state interest also links strongly with the following state interests:

- Amenity and community wellbeing
- Land development and housing supply
- Agriculture
- Development and construction
- Mining and extractive resources
- Tourism industry
- State infrastructure and services
- State transport infrastructure networks
- Strategic airports and aviation facilities
- Strategic ports
- Water supply catchments and infrastructure
- Healthy waters



The SIAQ supports the flooding components of the Natural Hazards state interest as described in the draft single State Planning Policy and the State Planning Policy Mandatory Requirements – Flooding Hazard.

The SIAQ notes that:

- no guidance material is provided for the Natural Hazards State Interest
- guidance material is provided for most other state interests, and where provided this guidance material is state government material only

In the case of flooding, *Australian Rainfall and Runoff* (Pilgrim, 1987) is the national standard for flood estimation and modelling. The current 1987 edition of *Australian Rainfall and Runoff* is undergoing a major review and when complete will continue to be the national standard for flood estimation and modelling for the foreseeable future. The SIAQ suggests that the SPP reference *Australian Rainfall and Runoff* for further information.

Conclusion

The SIAQ thanks the State Government for the opportunity to comment on and provide input to the single State Planning Policy.

The SIAQ's submission focussed on two State Interests:

- Healthy Waters
- Natural Hazards (specifically flooding).

In both instances the SIAQ commends the State government for including the topics as state interests, and for the detail provided within. The SIAQ recommends a number of minor changes to the wording of the State Planning Policy that we feel would significantly elucidate and improve the already strong Healthy Waters and Natural Hazards (flooding) State Interests.

We look forward to seeing the final State Planning Policy.

Yours Sincerely



Nicole Ramilo

President

Stormwater Industry Association Queensland

References

IRIS Research (2010) *2010 Logan City Council Community Survey*

Pilgrim, DH, (ed) (1987) *Australian Rainfall & Runoff - A Guide to Flood Estimation*, Institution of Engineers Australia, Barton, Australia

TNS Social Research (2010) *Queensland Growth Management Summit 2010 Social Research on Population Growth and Liveability in South East Queensland.*