Stormwater
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Submission in relation to the infrastructure planning and charging framework review

Submission by:

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General

We have endeavoured to keep this submission succinct, but realise that reform in this area is nuanced and complex. Please contact us for further information on any aspect of our submission.

Submission Point 1 – Stormwater infrastructure is an essential part of community infrastructure and should not be deleted from the list of "Essential Infrastructure".

Preamble

- Stormwater management has substantive impacts on our community:-
- Overland flow and flooding
- Impacts on receiving water quality
- State Planning Policy 4/10 Healthy Waters (SPP 4/10) mandates stormwater management (both quantity and quality) practices on most "development for urban purposes"

Submission

Adopting a blanket arrangement conditioning on-site treatment has significant disadvantages and will not result in the best result for the community.

Universal adoption of on-site solutions will lead to a proliferation of small installations of varying quality, most with inconsistent or no maintenance standards.

Topography is a major factor in siting stormwater management infrastructure, more so than for other types of infrastructure.

There are some areas and development types that suit on-site treatment and other areas where larger off-site solutions are more appropriate. Community benefits are maximised and resources are most efficiently utilised by using a "horses for courses" approach.

Local Authority Master and Infrastructure Planning should identify and reserve flow paths and appropriate locations for off-site stormwater management infrastructure, and identify areas more suited to on-site management.

Specific infrastructure charges can then be applied to developments in catchments where off-site management is proposed and not in areas where on-site treatment is applied.

Significant components of stormwater infrastructure must be retained as "essential infrastructure" and included in any infrastructure charging regime.

Submission Point 2 - In relation to stormwater management requirements, use of the terminology " . . treatment to a standard of non-worsening . . " is inappropriate.

Preamble

- SPP 4/10 mandates stormwater management (both quantity and quality) practices on most "development for urban purposes".
- The SPP does not require "non-worsening".
- Some aspects of urbanisation (such as noise levels, air quality and some stormwater impacts) cannot practicably be negated. Urbanisation necessarily brings some negatives.

Submission

The wording of requirements for environmental stormwater management should reflect current best practice management principles.

The basic requirement should be in compliance with SPP 4/10 or its successors.

Where downstream infrastructure does not have capacity to deal with increased flow rates resulting from urbanisation, management of peak flow rates to match pre-development conditions can be required. The range of events to be managed should be at the discretion of the Local Authority, with reference to the specific waterway concerned.

"No worsening" of peak flow rates, water levels and flood extents can also be an appropriate requirement to manage flooding impacts.

Submission Point 3 – Stormwater infrastructure costs can be reduced in many situations by better integration of parks and drainage.

Preamble

Most Local Authorities presently separate "drainage corridors" from "park".

Most Local Authority engineering guidelines encourage or anticipate "hard" channel or pipe solutions for stormwater drainage.

Hard solutions are hydraulically efficient but do nothing for either a catchment's health or urban visual and recreational amenity.

Submission

To manage costs, we need to re-think the way we manage surface water. In many situations, surface solutions are better for the catchment and better for the community.

As a community, we need to change our attitude to parks and drainage and generate a win/win situation for developers and the community as a whole. We can achieve a better overall result, at reduced cost, by:

- Taking advantage of the natural linkages provided by overland flow paths.
- Incorporating these into formal and informal green space multi-use links
- Generating the necessary win/win (developers and community) by applying full credit to these green multi-use linkages (which occasionally serve a drainage purpose).

Surface solutions take up more space than hard solutions. Locations are largely determined by topography, independent of development layouts. For this new arrangement to be successful, it is essential that Local Authorities identify and reserve the necessary corridors and spaces ahead of development.