

12 August 2022

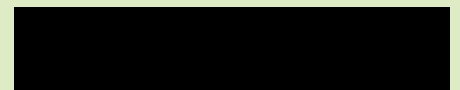
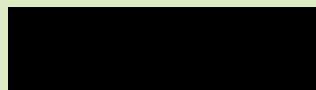
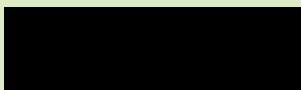
Dear Department of Planning and Environment,

Thank you for the opportunity to comment on the draft NSW Groundwater Strategy (Strategy).

It is pleasing to see that the draft Strategy has considered the contribution that stormwater and green infrastructure can make to groundwater recharge, particularly through a managed process.

We have several suggestions.

- When discussing strategies for reducing saltwater intrusion into coastal sands aquifers, Stormwater NSW would like to see recognition of the benefits that managed aquifer recharge has in maintaining an appropriate balance of fresh and salt water in these aquifers.
- Stormwater in every urban environment is available for treatment and capture. It is widely under-utilised and should be recognised as a valuable resource in terms of managed aquifer recharge and securing water supplies for rural communities. Reuse of stormwater speaks to the circular water economy and reflects the Aboriginal view of water use, that the resource is valuable, shouldn't be wasted, and its use should be maximised. Stormwater NSW would like to see this sentiment reflected in the Strategy.
- Green infrastructure provides many benefits to groundwater, not only directly through infiltration, but indirectly through cooling the environment and reducing evaporation of surface water. This relationship could be further developed further in Box 7. Using nature's own solutions to better protect groundwater. Green infrastructure can also improve air quality, human well-being and biodiversity in ecosystems. It is important that green infrastructure is considered in a holistic way in terms of all its benefits, rather than in terms of singular functions.
- We are pleased to note the references to direct injection of recycled water to supplement groundwater storages (Box 8). Stormwater NSW would like to see a more direct connection made to reuse of treated stormwater (an underutilised resource, particularly in rural communities) in this capacity.
- It is pleasing to note that the Government is developing policy for managed aquifer recharge through the NSW Water Strategy. There are many lessons learnt in both Perth and Adelaide, so it is hoped that NSW will draw on these learnings.
- In regards to Action 2.2.3. Foster innovative groundwater solutions, including MAR, to support communities and industries, Stormwater NSW would like to see the NSW Government commit to assessing the contribution of green infrastructure to groundwater recharge, both in terms of identifying processes and quantifying potential volumetric contributions. Stormwater NSW would also like to see the Government commit to investigating the potential for direct injection of treated stormwater into groundwater aquifers to supplement supply.



We appreciate the time taken to consider our position in finalising the report and recommendations. If you have any further questions, please contact us at

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Yours sincerely,

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