

From: [Ana Terrazas](#)
To: [DPIE Greater Sydney Water Strategy Mailbox](#)
Cc: [Sarah Joyce](#); [Nell Graham](#); [SCCGAdmin](#)
Subject: SCCG and PRCG submission on draft Greater Sydney Water Strategy
Date: Monday, 8 November 2021 2:51:32 PM
Attachments: [SCCG and PRCG Submission on draft Greater Sydney Water Strategy - final.pdf](#)

Dear Greater Sydney Water Strategy group,

Thank you for the opportunity for the Sydney Coastal Councils Group (SCCG) and Parramatta River Catchment Group (PRCG) to comment on the draft Greater Sydney Water Strategy. The SCCG and PRCG are working together with 20 Councils and several state agencies to deliver the Greater Sydney Harbour Coastal Management Program (GSH CMP) which aims to improve and sustain waterway health through greater collaboration, consistency, and leadership at a catchment scale.

Please find attached our feedback and our responses to the focus questions.

Kind Regards,

Ana Terrazas

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(Mondays, Wednesdays & Thursdays)

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Monday, 8 November 2021

Re: Submission on the [Greater Sydney Water Strategy](#)

Thank you for the opportunity for the Sydney Coastal Councils Group (SCCG) and Parramatta River Catchment Group (PRCG) to comment on the draft Greater Sydney Water Strategy.

Strategic Alignment

The SCCG is a regional organisation of councils, established in 1989 to promote collaboration among member councils on environmental issues relating to the sustainable management of the urban coastal and estuarine environment. The group comprises nine councils adjacent to Sydney marine and estuarine environments and associated waterways and represents nearly 1.3 million Sydneysiders.

We are guided by the [SCCG's 2019-2029 Strategic Plan](#) which includes six goals, four of which are highly relevant to the Greater Sydney Water Strategy

- People and places adapt to a changing climate and future shocks and stressors.
- Waterways and the foreshore are protected and healthier.
- The SCCG is comprised of sustainable, livable and 'smart' cities.
- There is a collaborative, effective and consistent approach to coastal and estuarine management.

The PRCG is an alliance of councils, government agencies and community groups. Through its 'Ten Steps to a Living River' [Masterplan](#), the PRCG's mission is "to make Parramatta River swimmable by 2025".

The importance of aligning with the work of the Greater Sydney Harbour CMP

Our primary concerns relate to integrated water cycle management (IWCM) in urban areas NSW. We would like to raise the importance of the work being done to improve waterway health in the catchment through the development of the various Coastal Management Programs (CMP) being developed in the Sydney region.

The Greater Sydney Harbour Coastal Management Program (CMP) which is being prepared under the *Coastal Management Act 2016* (NSW) is of particular relevance. The SCCG and PRCG are collaborating with 20 Councils and several state agencies to deliver the CMP which aims to improve and sustain waterway health through greater collaboration, consistency, and leadership at a catchment scale. Further information on the GSHCMP can be found on the SCCG web-site [here](#).

Given the linkages between the GSHCMP, the Groups' Strategic Directions and the Greater Sydney Water Strategy, we welcome further consultation to ensure strategic alignment with CMPs and to explore opportunities to leverage and support key outcomes.

In consideration of the draft Greater Sydney Water Strategy, the SCCG and PRCG provides the following responses to some of the focus questions:

What do you think our biggest challenge will be to ensure the resilience and sustainability of the water and wastewater systems in Greater Sydney?

The biggest challenge will be to carry out changes to policy and regulation that allow a cohesive and coordinated approach that permit managing land and water resources in a more integrated way.

The community is requesting to protect waterways and access to a greater number of clean and safe swimming sites in the catchment as identified through the PRCG's Masterplan and through community activism at sites in the outer harbour. It is imperative that the Greater Sydney Water Strategy enables councils and agencies such as NSW Department of Planning, Industry and Environment, Sydney Water and TfNSW to work together on improving policies and programs.

Additionally, water assets in the Greater Sydney region are ageing and need upgrading or replacing to meet the needs of a modern growing city under changing climatic conditions, rising sea levels and more frequent extreme weather events.

What would you like the future of our water systems to look like?

There are significant barriers to the effective implementation of integrated water cycle management (IWCM) in urban areas. Whilst State Government controls potable water supply and wastewater management, it has limited responsibility for stormwater management which falls largely with Local Government. Regulatory reform is needed to address cross jurisdictional deficiencies for IWCM. There is no clear leadership or mandate from State Government agencies and there is little or no integration of stormwater management between state and local jurisdictions in either policy or strategic settings, with little impetus to achieve common objectives relating to stormwater quality and impacts on waterway health.

The Greater Sydney Water Strategy should recognise multi councils Coastal Management Programs (CMPs) and support the delivery and further regulatory reforms be undertaken to ensure the effective coordination of responsibilities of State and Local Government for IWCM.

Which option do you think will have the greatest impact on improve our resilience?

The option we believe will help deliver improved waterway health in the Greater Sydney Harbour catchment is by planning for new rainfall-independent supply sources to support growth and protect the natural environment. In particular, we believe it is imperative to maximise the use alternate water sources such as stormwater to meet demands for cooling, greening and amenity. Encouraging a greater use of stormwater harvesting will "enhancing health of our rivers".

The development of a new model for stormwater governance and regulatory policies to priorities the integration of land and water uses by encouraging water sensitive urban design and support the use of rainwater and stormwater harvesting on various scales will have multiple benefits. It will prevent excessive volumes of stormwater runoff entering streams in the catchment and protect the ecology and geomorphology of the streams; it will reduce the pollutants washed into the streams and allow treatment closer to the source; it will assist in reducing the demand for drinking water for irrigation as well as providing opportunity for innovation to assist in cooling buildings and surrounding environment.

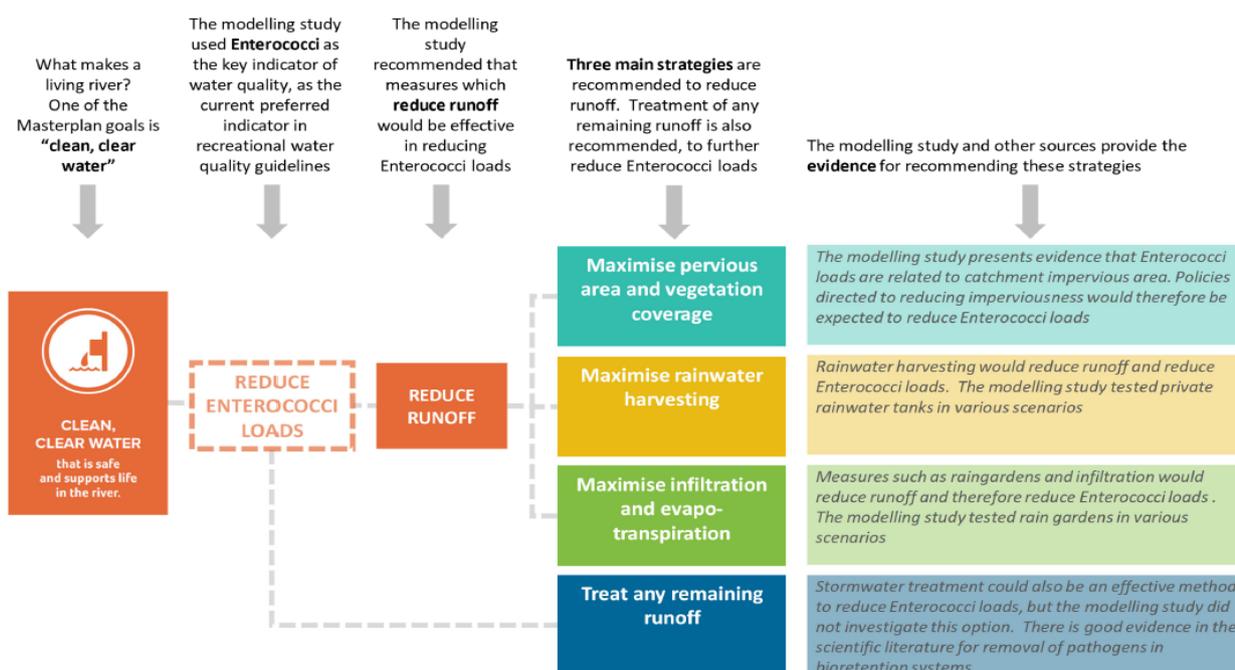
What do you think your water requirements will look like over the next 40 years? Will they grow or shrink?

Greater Sydney’s population is anticipated to grow and therefore the demand for water will grow. Associated with this growth, the NSW Premier’s target to increase tree canopy to 40% across the Greater Sydney by 2036 will further increase the demand for water.

Many Councils in the Greater Sydney catchment have adopted the Greening our City Program to enhance the urban canopy. This is an important step towards improving air quality and cooling the Greater Sydney catchment; however, growing more trees implies growing water requirements. However, we need more innovative and fit for purpose option such as stormwater harvesting for irrigation in order to optimize the benefits of this form of green infrastructure.

In February 2021, the PRCG completed a review into the planning reforms that are required to create a living river. The resulting report [Strategic and Statutory Planning Review to create Our Living River – Final Recommendations Paper](#), is the result of many months of work between Sydney Water, PRCG partners and NSW government agencies, through workshops and extensive consultation, including with our project partners in DPIE (specifically the Green and Resilient Places team, District Teams, Planning Policy: Environmental Policy, Codes, Infrastructure funding and public space Public Space and Green Infrastructure Team, EES; Place based Science, Water for the Environment, Water floodplains and Coast; Marine coasts Estuaries and Floods, Water Markets).

While the review was undertaken to achieve the PRCG’s vision for the river, the resulting report could be applied to any catchment to deliver improvements to water quality and increase green cover. The diagram below illustrates the main strategies that can be employed on-lot and at precinct scale, to protect our receiving waterway environment and create deep soil and landscaping opportunities, resulting in greener urban environments.



Source: [Strategic and statutory planning review to create our living river](#), Parramatta River Masterplan - Step 4 Final recommendations paper, Feb 2021. Accessed 5/3/2021

Targets around stormwater retention rather than a singular focus on demand reduction would be more appropriate to delivering a blue-green outcome. This can be achieved by:

- Maximising the proportion of the roof connected to the rainwater tank
- Building in a rainwater harvesting tool to quantify the expected reduction
- Set a minimum standard for runoff reduction (% of post-development flows) for different development types.
- Maximise connections to different end uses (e.g., garden, toilets, laundry, hot water)
- Maximise tank volume.
- Encourage "leaky" tanks where water trickles out to a passive irrigation/infiltration area, increasing the potential for rainwater tanks to capture runoff during rain events.
- Build this feature into an infiltration tool.

What role should water play in delivering a more prosperous and liveable Greater Sydney?

Water is a key ingredient to the prosperity and liveability of our city and urban communities. We believe water plays a big role in day-to-day life in the Greater Sydney Harbour area. Much more effective and efficient outcomes can be achieved for our cities if they are planned with water in mind, if we use soft water sensitive urban design preferable over hard infrastructure to deliver water services and encourage good planning and integration of water in solutions for improving the liveability of our cities.

Where do you think our biggest investment should be to help combat the big water challenges facing Greater Sydney? P39

Significant investment is needed to improve Sydney's resilience to drought. Key water assets need to be improved and new investment in stormwater systems is required for healthier waterways. The GSHCMP Stage 2 investigations will bring together available information on urban stormwater and apply existing tools (such as the NSW Government's Risk Based Framework for Waterway Health) in a coordinated way, to enable individual councils working with State Agencies to develop projects to help mitigate impacts of stormwater discharge for consideration in Stage 3 of the CMP.

It is imperative we make the best use of all water sources and increase our water recycling and adopt a zero discharge to oceans policy.

Do you think these types of extreme weather events will occur more frequently?

Yes. We need infrastructure that serves multiple purposes and provides resilience to heat, adaptability to capture and slow rainfall in large rain events and reduce flooding, and closes the loop on sending wastewater to ocean outfall.

During a drought, what do you think is the most beneficial way to conserve water?

The more beneficial way to conserve water during a drought is to use water that it fit for purpose. Allow Councils and residents to be able to access rainfall independent supply options such as stormwater harvesting for greater use of recycle water for watering public open spaces and residential gardens and other non-potable uses such as cooling buildings. Your survey questions do not go far enough and should also encompass waste water recycling as well as initiatives that individuals can implement in their homes.

Which priority do you think is the most important to improve resilience in the Greater Sydney Water Strategy?

Of the five proposed priorities that underpin the principles for improving resilience in the draft Strategy we think that Priority **4 Our waterways and landscapes are healthy** is the most important because improve and invest in stormwater systems is imperative to maintain ecosystems health and protect water for recreation/the Greater Sydney people to enjoy; however, it goes hand in hand with Priority 3: **Our City is green and liveable** in particular it is urgent to enable a better integration of the water cycle and land use planning (action 3.1) and support the design principles identified by the Government Architect NSW and on the new Design and Place State Environmental Planning Policy (SEPP) (action 3.2).

What approach do you think will best help create a cool and green Greater Sydney?

We agree that to support growing communities and deliver a cool and greener Greater Sydney, it is imperative to make a much greater use of stormwater and recycle water, support using innovatively water sensitive urban design and integrate water and land use planning more effectively with a whole-of-catchment approach.

What potential initiative do you think would best help Greater Sydney move towards a circular economy?

From the initiatives proposed on the draft Strategy we think the ones to best help Greater Sydney to move towards a circular economy will be: improving economic valuation models to capture environmental benefits and the value of natural capital; increasing use of recycled materials in the supply chain and “level the playing field’ for circular economy projects and businesses.

What do you think will be our greatest challenge when it comes to improving the health of our waterways?

There are ongoing issues with poor water quality of stormwater and impacts on waterway health in urban streams in Sydney catchments, particularly after rainfall events. The requirements of Councils in NSW to construct and maintain urban stormwater infrastructure are prohibitively onerous and there is insufficient financial support to achieve adequate stormwater quality. Ageing infrastructure often fails to protect the natural environment and the health of our waterways. Greater support at the state level is critical.

Complex and fragmented governance, with no single government entity responsible for urban waterways, often overlapping plans, policies and processes that impede the progress of the implementation of IWCM in Greater Sydney area.

Which potential future approach to wastewater management do you think would be most effective?

From the approaches proposed on the draft Strategy we think the two most effective will be: -

- Improving the resilience of the wastewater network, such as replacing and renewing ageing assets
- Increasing our understanding of emerging pollutants such as microplastics, pharmaceuticals and other contaminants and identifying initiatives to reduce their impact on our waterways.

Does your community have sufficient stormwater management systems in place?

No. There are not enough incentives for the community to put in stormwater management systems. BASIX only affects new builds and there is not enough water re-use in larger developments.

Future Collaboration

We believe that the Greater Sydney Water Strategy provides an opportunity to establish the framework to better manage the discharge of urban stormwater to our urban rivers, bays and Sydney Harbour in particular by strengthening oversight, coordination, compliance and enforcement activities to protect waterways and beach from the impacts of rising sea levels and predicted more frequent extreme events.

The SCCG and PRCG are working together with 20 Councils and several state agencies to deliver the Greater Sydney Harbour CMP which aims to improve and sustain waterway health through greater collaboration, consistency, and leadership at a catchment scale. Therefore, we believe that there should be greater consultation with SCCG, PRCG and its members Councils on the draft of Greater Sydney Water Strategy particular its implementation plan and funding mechanisms developed for achieving both the Greater Sydney and NSW Water Strategy.

If you have any queries, please contact us by email at [REDACTED] or [REDACTED] or by phone on [REDACTED].

Yours sincerely,



Sarah Penny Joyce

SCCG Executive Officer



Nell Graham

PRCG Coordinator