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Mr Ashraf El-Sherbini
Director, Resilient Cities and Towns
Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

By email: 

Dear Mr El-Sherbini,

Draft Greater Sydney Water Strategy

The City of Sydney (the City) is pleased to make this submission to the Department of Planning, Industry and Environment (DPIE) in response to the release of the Draft Greater Sydney Water Strategy. The City is largely supportive of the NSW Government's 20-year strategy with a focus on water conservation and more rainfall independent water sources.

Water is essential for healthy, sustainable and liveable communities. Our Environmental Strategy 2021-2025 describes our vision for a water sensitive city that achieves the following outcomes for our community:

- efficient use of potable water and reduced demands on the water and sewerage networks through water efficiency and water recycling.
- increased amenity and urban cooling through improved green space maintained by independent, climate resilient water supplies.
- improved quality of local waterways through reduced pollution discharged via wastewater and stormwater outlets.

These outcomes are increasingly important as we respond to the demands of unprecedented population and changing climatic conditions including warmer temperatures and changing rainfall patterns.

The draft Greater Sydney Water Strategy identifies a number of key challenges which the City concurs with and in particular, **building resilience to drought and a changing climate**.

The City would like to commend DPIE for the overall direction of the strategy and would like to highlight the following:

Long-term planning

The City is pleased to see this strategy has a 20-year life with a 40-year planning horizon. Longer term planning more readily allows for integration of water infrastructure work, in particular reticulation, with other public domain infrastructure works ensuring greater outcomes for all beneficiaries.

Purified recycled water for drinking

A number of global cities already use purified recycled water for drinking, including Singapore, Los Angeles and Perth, Australia. The City is strongly supportive of greater recycled water use and welcomes future planning for greater use of rainfall independent water, including purified recycled water. We note the plan to build a demonstration plant as part of the community engagement program to aid in demonstrating the technology to the public. The City agrees this will need strong community engagement and believes local councils are able to play a key role in helping to engage with their local communities and to that effect the City of Sydney would welcome working with Sydney Water and DPIE to identify and implement suitable demonstration projects.

Integration with other planning tools, including land use planning

The City agrees that integration of water cycle and land use planning is critical to achieving maximum resilience and liveability.

The City is a leader in integrating water sensitive urban design (WSUD) in all urban development.

The BASIX Water Target for Sydney has been set at 40 for all residential development typologies since the BASIX scheme commenced in 2004. It has been extremely successful in driving rainwater tanks in low-rise residential developments helping deliver resiliency and this policy has built considerable capacity in the trades that connect and install tanks.

However, BASIX has not delivered strong outcomes for the residential apartment sector (high-rise). The 40 Water target can be achieved without any in-dwelling recycled rainwater or stormwater use. To reach the target it is common for apartment developments to nominate water-efficient appliances. While appliance efficiency standards play an important role in delivering water efficiency gains, they are already regulated under the federal government's WELS rating scheme.

The City believes water reuse in building and storm water quality outcomes from redevelopment should be the focus of the next generation of BASIX.

The City welcomes an effectiveness review of BASIX and would be happy to participate in working with the Department in helping improve the outcomes this tool is achieving.

Our waterways and landscapes are healthy

Being able to swim safely in the harbour is a wonderful symbol of a healthy water ecosystem. If we can clean up the harbour, we will unleash enormous potential for community recreation and wellbeing.

Since the abolition of the NSW Stormwater Trust and the Upper Parramatta River Catchment Trust Integrated Catchment Management and Storm Water Quality are orphans in the NSW Water Governance model, with no single government entity responsible for urban waterways.

The City is reducing stormwater pollution entering into the Harbour by installing and maintaining stormwater treatment systems such as Gross Pollutant Traps (GPT), raingardens, wetlands and swales in our stormwater network. The City's 250 raingardens and 47 GPTs prevent hundreds of tonnes of litter from entering our waterways.

Make much greater use of stormwater and recycled water to cool and green the city and support recreational activities

The City agrees that there should be much greater use of stormwater and recycled water across Greater Sydney. The City has built more than 20 water recovery systems across city parks, and in the Green Square Town Centre is recovering stormwater and will deliver up to 900,000 litres per day of non-potable water for up to 4,000 apartments when the town centre is completed.

We know greening reduces the impacts of urban heating, helps remove pollutants and boosts mental health. The City of Sydney recently committed to greening 40 per cent of its local area by 2050. Our plans include holding our operational potable water use at 2006 levels and where feasible, we use non-potable water to irrigate our green spaces.

The City believes much greater use of recycled water could be achieved by mandating recycled water pipework (3rd pipe) in all new developments, particularly in infill areas, where decentralised systems could assist with water security. The City also believes non-potable water systems will also assist in helping the community increase acceptance of greater uses for recycled water.

Greater recycled water use would be assisted by the NSW Government committing to a recycled water target. Targets help align agencies to deliver on outcomes.

As a NSW Government Strategy, it is the City's expectation that actions identified within it will be backed by appropriate funding through NSW Treasury.

The City welcomes the Draft Greater Sydney Water Strategy and is keen to work with DPIE in refining the strategy and developing the implementation plan.

Should you wish to speak with a Council officer about this submission, please contact Anna Mitchell, A/Sustainability Director by telephone on [REDACTED] or by email at [REDACTED].

Yours sincerely



Monica Barone
Chief Executive Officer