

8 November 2021

Dear Strategy Team,

Thank you for the opportunity for Stormwater NSW to provide a response to the Greater Sydney Water Strategy 2021. As highlighted in the report, we collectively have significant challenges in securing the water supply, urban amenity and environmental outcomes desired for our nation. We would like to acknowledge the veracity of the document and the holistic approach. In the context of climate risk, population growth and need to protect and enhance our environment, this document presents an important next step towards integrating water management to care for our population and the environment effectively and efficiently.

Stormwater can and will play a role across each of the priority areas, however, it will contribute the most across priorities 3 (our city is green and liveable) and 4 (our waterways and landscapes are healthy). Indeed, the strategic pathway for priority 3 highlights the need to overcome barriers to integrating water cycle management (IWCM), make more extensive use of water sensitive urban design (WSUD), develop a new model for stormwater governance and ensure mature and consistent systems are in place for management and use of water in urban areas. The stormwater industry is able to support regulation of flow regime, protection of water quality and to contribute to provision of water supply for appropriate purposes. At this stage, intent for contribution to supply in particular is notably vague. We acknowledge that the place-based approach is ideal and will influence the relative role of recycled water and stormwater, however significant opportunity exists, particularly with the BASIX requirements scheduled for review.

Much of the outcomes intended by this and other recent strategies and plan relies on emerging approaches, such as the typology work for Western Sydney. It is imperative that sufficient detail and training is provided to the industry to ensure these aspirations are carried through. It has been observed that stormwater management and maintenance is an area where uplift is required with regard to previous WSUD requirements. Recent work around retaining water in the landscape including the four technical solutions and precinct scale interventions can achieve good outcomes – if successfully implemented and managed.

There is an urgent need to articulate and legislate the new model for stormwater governance alluded to here, such that there is a clear authority over catchments and their waterways, as well as the resulting ability to seek adequate, secure, and ongoing funding for their management. Councils, utilities and government agencies are planning towards the agreed vision without certainty of responsibility for integration of water and provision of urban water services and amenity.

In the face of growth pressures, changing climate consideration of flooding, water security, amenity and environmental health, future stormwater investment requirements are significant. Governance and the legislation to support it, remains inadequate. While authority and responsibility remain ambiguous, so does the willingness and ability of organisations to invest in infrastructure or commit to longer term ownership and maintenance.

In summary, we agree with the priorities and strategies outlined within the Greater Sydney Water Strategy 2021, but detail about governance and the role of stormwater, as well as adequate and sustainable funding pathways remains elusive.

We appreciate the time taken to consider our position in finalising the report and recommendations. If you have any further question, please contact us by e-mail at [admin@stormwaternewsw.asn.au](mailto:admin@stormwaternewsw.asn.au)

Yours sincerely,

Alan Benson, President  
On behalf of Stormwater NSW