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Submission: Dear Sir / Madam

With regard to the review of the operating license for Sydney Water, I would like to submit the following:

My main recommendation is that the operating license be amended to include specific direction for Sydney Water to address stormwater pollution and waterway health more generally.

Contemporary stormwater management adopts a Water Sensitive Urban Design (WSUD) approach, where not only stormwater flow (drainage) but also stormwater pollution is managed. This approach has been being successfully implemented by Melbourne Water for several years. Sydney Water's stormwater systems convey pollution to receiving waters whenever it rains. These systems should provide a minimum specified level of stormwater pollution treatment in order to protect waterway health and public amenity.

I recommend section 1.3 of the existing operating license ("Maintenance of stormwater drainage system") be amended to "Provision of stormwater services".

The service being provided by both wastewater and stormwater assets is the protection of public health, safety and amenity as well as receiving waterway health.

Stormwater flows commonly cause wastewater overflows. So to effectively manage urban wastewater, stormwater flows must also be managed. In addition, as a result of the significant investment that has been made in reducing wastewater pollution, further waterway health improvements can only be achieved by better managing stormwater pollution.

The community and local government are fed up with the broken governance arrangements for stormwater management in Sydney. There is inconsistency in approaches and investment in stormwater management between different local government areas and different state government agencies. Yet almost all waterways flow through multiple local government areas and state agency jurisdictions. It's a case of when everyone is partly responsible, no one takes responsibility. Sydney Water is perfectly placed to provide leadership, coordination and guidance to help resolve this issue.

The community expectation is for healthy waterways that have minimal gross pollutants, have good ecological health and are suitable for secondary contact as a minimum and, if not already, for primary contact (ie. Cooks River and Parramatta River).

To help achieve this I recommend the addition of infrastructure performance targets for Sydney Water's stormwater systems with regard to both hydraulic capacity and pollution removal. As stated in the Act and the existing operating license this could be delivered by Sydney Water or by another appropriate body. Targets could be to develop and implement waterway health improvement plans and pollution reduction targets for each catchment that all agencies are committed to achieving.

Thank you for the opportunity to comment, I hope you find my input constructive.