

Submission to Sunshine Coast Regional Council (SCRC) re the SCRC Draft Stormwater Management Strategy

Organisation Sunshine Coast Association of Residents (OSCAR)

Introduction

OSCAR and its member groups congratulates SCRC on the development of the Draft Storm Water Management Strategy. The strategy and actions in the main are comprehensive, detailed and forward looking. They are also consistent with other SCRC key strategic documents.

We also thank SCRC for the opportunity to discuss the strategy with Crispin Smythe and Nadia Guterras and the extra time they allowed the discussion to take.

OSCAR endorses the following statement in the Summary document page 2:

Stormwater management aims to protect people and property from unacceptable flooding risks, minimise adverse impacts to the natural and built environment, and ensure that stormwater is valued as a resource.

We welcome the inclusion of the section *Planning for change* and the recognition within that of:

- climate change and the need to adjust policy responses as further science , policy positions and detail become available
- the impact of impervious areas and pressure on stormwater networks
- the importance of careful consideration of the impact of infill and consequent constraints as the scale impervious areas increases
- the need to plan for Climate change
- consideration of design as a function in the modification of existing buildings, renovations and new buildings as part of stormwater management. (We will make comment re this issue further in the document).
- changing house styles to consider building houses on structure in areas where flooding and overland flow are significant issues as opposed to the modern house design that is large, slab on ground and block existing flow paths. This is something the community advocated for in the CHAS.
- Landuse planning to consider stormwater and local flooding
- Stormwater harvesting including passive and traditional stormwater harvesting

Similarly we support the number and process of the actions developed as part of the implementation of the strategy. We will make comment about the priority order of some actions.

Issues relating to the development of the strategy

Generally strategies being developed are informed by a number of background studies including: current status; statistics; forecasts for the future and related research. We felt generally that the Stormwater Strategy lacked this information. We accept that this information has been applied but we find limited reference to any such supporting information.

We understand that over the last year or so SCRC has been conducting a Stormwater audit. Priority areas of stormwater flooding danger as identified by Audit need to be identified. An ongoing audit process also needs to be considered in the action section of the strategy.

Furthermore, although appreciating and acknowledging the inclusion of an *Investment indicator* in the action document we are looking for more detailed financial analysis. This includes:

- What is the current spend on maintenance and upgrades of stormwater assets?
- What proportion is the above of the budget spend on an annual basis?
- Current and future expenditure needs should be included with forecast % of rates expenditure on stormwater
- Sources and in what percentage will future costs/needs be funded – rates, grants, developer charges?
- What % of future costs of new stormwater infrastructure be grant or developer funded?

We note that throughout the document there is very limited, if any, reference to practices in other LGAs and jurisdictions with similar challenges that might assist in informing SCRC strategy development.

Similarly we do not see evidence of benchmarking. This would include in the Desired Standards of Service sections and generally to ensure that SCRC strategy achieves the highest standards.

For any strategy to be effective it must be evaluated against measures outlined within the strategy. We can see no evidence that there are any measures proposed and no evaluation process identified. This is an essential component of development of a strategy. We assume that this is an oversight and is yet to be developed.

A major business involved in Sunshine Coast water issues is that of Unity Water. There does not appear to be any reference or apparent involvement with Unity Water in this strategy development. We find this concerning given that Unity Water is currently developing a Total Water Cycle Strategy and have been consulting with a number of community members. We ask the question?

What part has and is Unity water going to play in the development of this Strategy and its implementation?

In the following pages we have listed components of the strategy and made specific comments as well as indicating support or other for those components. For part B of the strategy, Council's Stormwater Roles and Responsibilities we have given an assessment, either individually or grouped. Where an individual assessment is given comments are included. We have also suggested an additional action 2.4.0 for Objective 2 (*Protected and Healthy*). We have also cross-referenced to Action 3.1.8 where what we have suggested for 2.4.0 could be included in there.

OSCAR and its member groups thank you for the opportunity to comment on the strategy and please pass out thanks on to the teams who developed the strategy.

Melva Hobson President OSCAR

Specific topics and related comments

Topic or issue and Strategy reference	Strategy Reference	OSCAR Comment
Resilient homes Pt A page 11	1. Reference is made to instances where it <i>“may not be possible or practicable to resolve existing stormwater flooding issues”</i> and the response: <i>This can be done through measures such as wet proofing, raising electrical appliances and raising structures.</i>	One asks the question – how realistic is it to raise a fridge? One would need a step ladder to get to the top shelf! How are existing residents in currently and severely impacted locations, and through no fault of their own expected to raise their house. This would mean a knockdown and rebuild – and at their own cost? How realistic is that?
	<i>“New buildings and renovations must ensure that potential stormwater flooding issues, and measures to improve resilience are appropriately considered in the design”</i>	OSCAR is in agreement with this statement, particularly in relation to new builds. We disagree with the use of the word “appropriately” in this instance. Used here it is a “weasel word”, that is anything may be considered under this word. For new builds there is NO excuse. For example it was recently drawn to our attention that in Marcoola, a resident undertaking a new build in an overland flow path visited 4-5 private certifiers to find one to sign off on their design which it is our understanding does not take account of overland flow.
Changing house styles Pt A p12	<i>“By incorporating good Sunshine coast design principles and WSUD many stormwater management issues relating to housing can be minimised”</i> Slab on ground and filling lots with almost all house can block existing flow paths and increase amount of runoff to existing stormwater networks	Throughout the development of the CHAS OSCAR’s representative Susie Chapman and other members of the CAG were very concerned that building houses on stumps of varying sizes was not being encouraged. We understand that this has now been addressed in the CHAS. OSCAR supports such design principles
Land Use planning Pt A p13	<i>“The new PS will be informed by the outcomes of this strategy and additional stormwater information. This will help to ensure that stormwater constraints and local flood risks are appropriately considered during land use planning”</i>	OSCAR strongly supports this measure, but requests a word other than appropriate be used. This may be the correct use of the word in this instance – eg appropriately conditioned. However, given the propensity for the word to be used to match any consideration that suits. OSCAR therefore suggests removal of the word appropriate from the sentence.
Stormwater harvesting Pt A p15	This section discusses both traditional and passive stormwater harvesting.	Our question - Is or will there be a strategy developed for stormwater and rainwater harvesting developed and will there be Council-funded programmes for assets such as water tanks for commercial, business and residential households?

<p>On-site detention storage Pt A p15</p>	<p>The role of on-site detention storage and associated issues.</p>	<p>We recognise that there can be multiple purposes of on-site storage some of which may be human-made lakes. We appreciate the issues raised in this section of the strategy. We are also aware of the role some detention basins also play in terms of biodiversity. However, we are very concerned that some developments propose artificial lakes as detention basins as an excuse to fill surrounding land and or establish canal estates in areas unsuited to such development. Stringent rules must apply in these circumstances that do not allow a developer to attempt to make them what they are not.</p>
<p>New Technologies Pt A p 15</p>	<p>A range of new technologies is listed with the proviso that prior to adoption by SCRC that: <i>new technologies and innovations need to demonstrate effectiveness and that they will not be a burden or liability for Council to maintain and operate over the life of the asset</i></p>	<p>Forecast new technologies are referred to but need to be further identified and their impact forecast. There is no reference to their potential impact or savings or reinvestment potential.</p>
<p>Other issues to be considered. Pt A p16</p>	<p>There are 11 other issues identified in this section of the strategy that need to be considered in determining the future direction of stormwater management in the region.</p>	<p>A number of these issues are of particular concern to OSCAR, its member groups and groups not affiliated with OSCAR. These include aging infrastructure, inappropriate construction and materials, illegal works, multiple stakeholders, service conflicts and site constraints and the raft of funding issues.</p> <ul style="list-style-type: none"> • There are many areas on the coast where there is ageing infrastructure. We seek advice on what plans are in place or are intended to be put in place to identify, quantify, and develop condition reports of existing infrastructure needs. Maintenance and Upgrade priorities for existing infrastructure needs need to be identified from future needs and a timeline for renewal and replacement should be undertaken and published for existing infrastructure. The question is “how many times can a Band-Aid be applied before the system collapses?” • There is no mention of the need to upgrade and improve septic systems. There are so many areas where this needs to be done. • Along with ageing infrastructure is the issue of some assets not currently “fit for purpose”. This refers to where pipes, for example require enlargement owing to development that has occurred over time.

		<ul style="list-style-type: none"> • We hear of illegal works being undertaken – what assurance is there that these will be followed up with remediation works being undertaken by the perpetrator. • We are very concerned about multiple stakeholders, and that exists within council alone before including external players. The community should not have to work out which part of Council is responsible for which part of the system. This occurs now in relation to parks and gardens and drainage. It is NOT the responsibility of the community to find that out. It is possible to have an integrated team with team members being in different Departments of the Council. There must be a common goal to which all work. One phone call to SCRC should be sufficient to remedy an issue regardless of “which department is responsible”. We have asked the question relating to the involvement of Unity Water in this strategy in the issues section in the development of the Strategy section of our response. • Resourcing and funding – current and forecast expenditure should be included.
Roles and responsibilities Pt A p17	Roles and responsibilities of Council, State government, the development industry, property owners and the community.	OSCAR understands and supports the statements in this section. OSCAR encourages SCRC to ensure that leadership by Council is followed by regulatory compliance (Local Laws and the Planning Scheme) by residents and developers.
Roles and responsibilities Pt A p 18-19	Property Owners – includes <ul style="list-style-type: none"> • individuals owning rural land or detached urban houses • body corporates controlling townhouse or unit developments • corporations operating large industrial commercial properties and states: <i>property owners are responsible for maintaining private internal drainage and inter-allotment drainage even located within an easement. Council will not become involved in civil disputes between neighbours regarding the obstruction of inter-allotment drainage and any relating defects.</i> 	Questions: <ol style="list-style-type: none"> 1. To whom or where does a private property owner turn when there are issues with neighbouring landowners, particularly during construction activities? 2. Is there a set of Fact sheets to assist private home owners in how to deal with such disputes? 3. Do home owners receive information about stormwater responsibilities, issues and scenarios in rate notices? 4. There appears to be no reference to industrial estates and compliance, particularly relating to wash-down bays. 5. Will there be water and cleaning capture in Business parks? 6. Is SCRC considering incentives for business as well as households and community to make contributions to achieving the outcomes of the strategy?

		<p>7. Does SCRC have an ongoing and active relationship with landcare and catchment groups and agricultural and rural associations across the region?</p> <p>8. In regional areas, particularly in the hinterland, where living there is again increasing in popularity, we see more development proposed some of which is in areas of potential landslip, no reticulated water supply and only septic or pump out systems. The community expects SCRC to ensure through its Planning Scheme that these activities do NOT compromise those things that this strategy is setting out to achieve.</p> <p>9. The role of the community as outlined in the strategy is acknowledged. We encourage SCRC to continue education programs and notices through rate notices that remind residents of their role and responsibility.</p> <p>The following questions has been asked:</p> <ul style="list-style-type: none"> • <i>Is SCRC still using signage such as ‘water flows to the ocean’ and related statements on its pits and drains across the region?</i> • <i>Are there educational programs about using biodegradable detergents for car washing and washing cars on grass?</i>
Policy/ Planning context Pt A p21-23	Statutory requirements, Council guidelines, policies and strategies, LG Infrastructure Plans are all referenced.	OSCAR acknowledges the raft and complexity of the context within which stormwater sits and particularly State Government Legislation and all other council related policies.
Strategic vision and objectives Pt A p24, 25	Stormwater Vision 2041 - <i>Stormwater is managed for community wellbeing and resilience, facilitated by an integrated stormwater network that is effective, sustainable and contributes to waterway health.</i>	We are supportive of this vision and look forward to being involved with SCRC in working to achieve this vision. We are also supportive of the objectives.
Objectives and strategic direction	<p>Resilient and Smart (p27-30incl) – wellbeing and resilience is enhanced by increased stormwater awareness, clever planning and good design.</p> <p>1.1- understanding stormwater flood risk and stormwater performance</p> <p>1.2 - Strategic identification and designation of land and assets</p>	<p>Strongly agree and suggest that all new development has to be assessed on the basis of cumulative impact on stormwater hydrology and not case-by-case, property by property. We understand that some areas eg. Maroochy North Shore may now require new developments to be considered on a broader area of influence and impact, and this should apply across the board. We seek clarification on that.</p> <p>Strongly agree</p>

	<p>1.3 – Sustainable, smart and functional design Policy positions 1.1-1.9</p>	<p>Strongly agree</p>
	<p>Protected and healthy (p31-35 incl) – Stormwater management protects the natural and built environment and supports healthy communities 2.1 – Effective stormwater treatment and water quality management 2.2 – An informed and engaged community and industry 2.3 – Compliance and accountability Policy positions 2.1 – 2.9</p>	<p>Strongly agree</p> <p>Strongly agree – however, page 33, para 8 line 1 use of the word “appropriate” is an unnecessary use of the word and should read “it is also necessary to inform.....”.</p> <p>Strongly agree</p>
	<p>Coordinated and well managed (p 36-41 incl) – Stormwater assets are effective and responsive to a changing environment 3.1 – Coordinated management and maintenance of stormwater assets 3.2 – Appropriate and sustainable levels and standards of service</p>	<p>Strongly agree – however we comment that working groups should be established, maintained and expanded, primarily to ensure more effective levels of service to the community as well as delivering cost savings.</p> <p>Not agree</p> <ul style="list-style-type: none"> • the use of the word appropriate in this sense is discriminatory in that it implies that different areas, particularly older areas are managed to a lesser standard. This is not equitable and is unfair, particularly to residents living in older established areas. Residents in older, established areas would expect that as renewal of stormwater occurs in their area that it would be to the standard experienced by other areas on the coast. • we seek clarification of the definition of “sustainable” in this context • Page 36 last para and over to p-37 is of concern, where it states “Public infrastructure works may therefore result in tolerable consequences on adjacent private property if the works provide an overriding community benefit”.

	<p>3.3 – Improved asset management and knowledge of stormwater assets</p> <p>3.4 – Prioritised and coordinated delivery of works</p> <p>Policy positions 3.1 – 3.16</p>	<p>We seek clarification here of the word “tolerable” – how will this be determined? Will the affected resident be engaged in this consideration or will it be unilaterally determined by a council officer?</p> <ul style="list-style-type: none"> • Similarly the para following on p 37 “<i>With the impact of climate change.....will not be significantly compromised</i>” again we seek clarification of the word “significantly”. • Reference is made to “<i>relining</i>” stormwater pipes in order to extend the life of stormwater pipes and/or avoid the high cost and inconvenience of replacement. There are a number of areas, again in older, established areas of the Sunshine Coast where the exiting pipes have been there for 50 years, have never been enlarged and may no longer be fit for purpose in terms of capacity. We seek an undertaking that such a decision will not be made without a comprehensive assessment of each case. <p>Strongly agree</p> <p>Agree overall – but we are concerned with the last para on page 38 where reference is made to some projects never proceeding based on a benefit-cost ratio being very low. There are some properties eg. Marcoola and Mt Coolum where individual or unit residents may be severely disadvantaged by this approach, with the consequences being that they become uninsurable through no fault of their own. There may have been fault by: the original build approved by Council, or not constructed as approved; the fault may be attributed to actions undertaken by a nearby development approval by Council or private certifiers; and/or more recent authorised structures may be a contributing factor.</p> <p>Strongly agree 3.1 – 3.8 (incl) Not agree 3.9 unless decision made in consultation and agreement with affected resident Strongly agree 3.10 – 3.16</p>
<p>Part B Detailed Actions Objective 1</p>	<p>Listed by exception</p>	<p>Overall comment. We understand that the detailed actions may vary over time, however, there are several which we question the proposed time-frame.</p>

<p>Resilient and smart</p>	<p>1.1.5 (p6) provide targeted education for members of the community vulnerable to stormwater flood risks (Low priority)</p> <p>1.1.7 (p6) Prepare MDPs to identify required infrastructure upgrades and</p> <p>1.1.8 (p6) Revise completed MDP's with desired standards of service in order to assist the prioritisation process (Both medium)</p> <p>1.2.3 (p7) Strategic identification of land required for regional stormwater quality treatment, protection or rehabilitation (Medium)</p> <p>1.2.4 (p7) Strategic identification of land required for improved overland paths, highlighting areas which could also provide Open Space or transport network uses. (Medium)</p> <p>1.2.5 (p7) Strategic identification of stormwater upgrade projects and easements identified in MDPs, backflow analysis or by the asset manager. (Low)</p> <p>1.3.1 (p7) Review the PS and Flooding and Stormwater Management Guidelines to ensure they align with the visions and objectives of Stormwater Management Strategy and that overland flow path requirements are properly considered. (High)</p> <p>1.3.6 (p7) Prepare guidance on how infill development should consider overland flows (in areas with and without an MDP) (Medium)</p>	<p>We are concerned about the rating given to this action. We appreciate if it relates to climate change for example in 2041 then such time may be acceptable. However, without creating undue stress, SCRC should have a continual education program related to the issues and the times.</p> <p>We seek clarification as to why this is categorised as “medium” as opposed to “high”? We would have thought element of this would be “continual”? Similarly, based on 1.1.7 that this might also have been continual.</p> <p>We question why these would not be undertaken in readiness for each development of a new Planning Scheme, starting with the proposed 2024 PS and the next iteration of the SEQRP? It would seem logical to us that before other uses are considered such sites should be identified – applying the precautionary principle. If sites are vacant they could be zoned to reflect such a use, or if the current activity is consistent with the future use it could continue.</p> <p>We question the categorisation of this action as “low” as we would think it might be continual. This will of course depend on the level of data gathering and record taking so as to not lose data through staff changes.</p> <p>Strongly agree</p> <p>Given the conversations underway at the moment in relation to both the Mass Transit Project (planned for 2027 in whatever form is decided) and the development of the New PS by 2024 the medium timeframe sitting at 2030 for this project seems out of sync. We feel certain that developers are circling already!</p>
<p>Part B Detailed Actions Objective 2</p>	<p>2.2.2 (p9) Prepare Fact sheets about the importance of effective stormwater quality management, the function of WSUD devices and the role of the community. (Medium)</p>	<p>Again this action seems to be out of sync with both the New PS development and the Mass Transit Project in whatever form it might take. However, we support the concept in principle.</p>

<p>Protected and healthy</p>	<p>All other actions under Protected and healthy</p> <p>2.4.0 proposed by OSCAR Undertake regular auditing of maintenance requirements for stormwater assets in existing vulnerable areas, with annual visual inspection and assessment are funded.(Continual)</p>	<p>This may be covered by 3.1.8 on page 11 (Coordinated and well managed strategy objective), <i>Stormwater assets are effective and responsive</i> to a changing climate however the regular auditing component is not included in 3.1.8 nor is either included in Objective 2 <i>Protected and Healthy</i>. We wish to see this applied to vulnerable areas or areas where there are known issues. Also we wish to see reference to annual inspections in these areas being identified and funded.</p>
<p>Part B Detailed Actions Objective 3 Coordinated and well managed</p>	<p><i>Stormwater assets are effective and responsive to a changing environment.</i></p> <p>3.1.1-3.4.4</p>	<p>Strongly support</p> <p>However, noting the discussion above re our suggestion for an action 2.4.0. This may be addressed with some changes to 3.1.8</p>