



Environment Centre NT

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NT Environment Protection Authority
GPO Box 3675
Darwin NT 0801

Friday, 20 June 2014

To Whom it May Concern,

Re: Draft Stormwater Strategy for the Darwin Harbour Region

Environment Centre NT welcomes this opportunity to comment on the Draft Stormwater Strategy for the Darwin Harbour Region. We welcome the release of this Draft Strategy and look forward to the final strategy being released and implemented by the NT Environmental Protection Authority in the near future.

Environment Centre NT particularly welcome provisions within the Draft Strategy for the NT EPA to conduct a review of the *Waste Management and Pollution Control (WMPC) Act* and strongly recommend that the NT EPA take this opportunity to strengthen regulations and increase penalties around the regulation and creation of offences of pollution and waste management so that they are a realistic deterrent to would-be polluters.

Given the history of non-compliance by some businesses discharging pollutants to stormwater, Environment Centre NT also strongly recommends that the NT EPA use its powers to 'name and shame' businesses and individuals which have breached waste management and pollution regulations as an additional deterrent.

Environment Centre NT welcome recommendations to increase powers to local authorities to manage stormwater, however only where this is accompanied by increased funding to those authorities to enable them to effectively take on these added responsibilities.

It is also clear from the results of the Draft Strategy that Darwin sorely needs tertiary wastewater treatment facilities. Although recent upgrades to the Ludmilla and Leanyer plants will assist with this by providing enhanced primary or secondary treatment, a tertiary treatment plant is long overdue. The need for this will only increase with further urbanisation and an increasing population¹

Environment Centre NT support the point highlighted in the Draft Strategy, exposing a loophole in the NT Planning Scheme which exempts building sites from the expected requirement to control erosion and sedimentation. This should be linked to a recommendation to amend the NT Planning Scheme accordingly so that this loophole can be closed.

¹ Aurecon (2013) Buffalo Creek Water Quality Improvement Plan
http://www.dha.gov.au/docs/default-source/Breezes-PDF/muirhead_buffalo_creek_water_quality_improvement_plan447C069DBC90.pdf?sfvrsn=0



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We also note that clearing guidelines prescribed under the *Planning Act*, including native vegetation buffers, do not apply to residential or industrial subdivisions. Given the lack of sediment control in these areas, this seems a glaring omission of the *Planning Act* which the NT EPA should recommend be remedied through amendments to the Act.

We support the resourcing of a community awareness campaign to reduce pollution of stormwater, however note that a tightening of loopholes and increased implementation of regulations in the *WMPC Act* and *Planning Act* are likely to be far more effective in reducing stormwater pollution, particularly from point sources.

We note the Draft Strategy's consideration of current technologies available to treat stormwater and support its recommendation that pollution is mitigated as much as possible before it is treated. However, it is not acknowledged that technologies in this area are constantly evolving and there is no consideration in the Draft Strategy of methods employed in tropical regions overseas which may be more applicable to Darwin, such as Singapore. We encourage NT EPA to recommend further investment into research in these areas, including pilot studies.

Please contact me should you wish to discuss any of the points raised.

Sincerely,

Anna Boustead
Policy Manager