

**June 20 2014**



## **SUBMISSION ON THE DARWIN HARBOUR WATER QUALITY PROTECTION PLAN**

The NTEPA strategy paper provides comprehensive assessment of the factors that will impact the environmental health of the Darwin Harbour now and into the future. The document will provide the basis of a healthy discussion on the strategies to be adopted to maintain and improve the health of the harbour.

The UDIA(NT) and its members recognise that the Darwin Harbour is a cornerstone of the quality of life for greater Darwin, and support appropriate measures to ensure the ongoing health and amenity of the harbour.

The UDIA(NT) supports the NTEPA's strategic objectives contained in the Darwin harbour stormwater strategy.

Particular comments are provided below:

### **Regulatory Changes**

The background information provided has highlighted the incongruities afforded by the current legislative and regulatory framework as it applies to the discharges to and from urban stormwater systems in the NT.

The UDIA(NT) supports proposed changes that will enable polluters to be held accountable for their actions, even if the focus of the action is remote from the harbour or point of discharge to the environment.

Land developers are required to prepare and execute detailed management plans for the control of erosion and sedimentation for their developments, during construction and operation of the development. When the individual land parcels created by development are sold, direct control of actions on the land moves from the developer. The constructors of built-form on the land do not have the same requirement to manage erosion and sediment control, leading to much of the "construction" sedimentation being generated during the 'uncontrolled' built-form construction which is outside control of councils and developers. Regulatory changes that enable monitoring and control of this phase will be welcomed by developers.

## Engage with Community, Industry, Local Authorities and Government Agencies in Improving Stormwater Quality

The UDIA(NT) supports consultation to determine the stormwater quality controls that the NT community, industry, agencies and Government desire and can afford.

The UDIA(NT) will actively participate in the consultation as representatives of the urban development industry.

Issues that the development industry will canvass during the consultation will include:

- Pollution reduction targets as currently set by NTG. The targets that have been adopted for recent urban development projects seem to have been set without consideration of cost/benefit analysis. For example, should the TSS target of 80% reduction be amended to 75%, the size of the resultant treatment system can be reduced by 30%, providing a significant payoff to the community in terms of yield, cost of land and ongoing community burden from costs of system maintenance.
- Improvements to Darwin Harbour water quality available from improved wastewater treatment.
- Research into the background levels of the identified pollutants that are released from undeveloped land to identify the extent of urban development impact.
- Research needs on the efficiency of treatment systems and systems suitable for tropical NT.
- Research into the impact of agricultural enterprises on the pollutant input to the harbour.
- Education programs to improve the efficiency of use of pollutants (such as fertilisers) in the urban environment, to reduce the amount of pollutants entering storm waters.

### Summary

The UDIA(NT) supports the NTEPA's strategic objectives contained in the Darwin harbour stormwater strategy.

The UDIA(NT) will be a willing and active participant in the projected consultative phase of the development of and implementation of the Stormwater Strategy for Darwin Harbour Region.

**For further information on UDIA (NT)'s position, or clarification of comments contained in this document, please contact Graeme Suckling on 0457 882 793 or email [ceo@udiant.com.au](mailto:ceo@udiant.com.au)**