

## Submission Form for Comments and Feedback

### NT EPA Draft Stormwater Strategy for the Darwin Harbour Region

Submissions close: **Friday 20 June 2014, 5pm**

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<p>Your comments will be publicly available.</p> <p>Mark the box here <input type="checkbox"/> if you do not want your comments to be made publicly available.</p> <p>Mark the box here <input type="checkbox"/> if you do not want your identity to be made publicly available.</p>			

Guideline Name	Section / Page of Draft Guideline	Comment
1. Purpose	Figure 1 description page 1	" This strategy will contribute to maintaining <u>high</u> water quality ....replace 'high' with <b>adequate</b> or <b>sustainable</b> as a descriptor in this sentence.
2. Management Issues	Page 2 - 3 Third para. Fourth para Fifth para  Sixth para	'High' water quality to be reworded as above Lack of information regarding comments in last sentence re data Reference to 'Pristine' – it isn't expected to be pristine as it is a working Harbour. Also reference to last sentence. Add after 'upper reaches of the Harbour <b>or around sewerage outfalls.</b> Reference to sediment flows in last sentence re estimated to have doubled since European Settlement. Again depending on the starting point – that does not (nor does it) mean they are not

Please complete the form and send it via one of the following by no later than **Friday 20 June 2014, 5pm**:

**Email:** [NTEPA.Consult@nt.gov.au](mailto:NTEPA.Consult@nt.gov.au)

**Post:** NT EPA, GPO Box 3675, Darwin NT, 0801

**Privacy:** Your personal information will be used for the purpose of collecting and collating comments received on the NT EPA draft guidelines. The NT EPA is subject to the *Information Act* and its Regulations. Information will not be disclosed to a third party, unless required by law or otherwise stated.

NORTHERN TERRITORY ENVIRONMENT PROTECTION AUTHORITY

Guideline Name	Section / Page of Draft Guideline	Comment
		acceptable?
	Seventh para	General comment on this paragraph. "Yes, but is this an issue when urban zones are reporting "good" water quality?"
	Eighth para	Regarding the population predictions – question "What is the basis for this statement?" In the final sentence this paragraph has launched itself off into Waste Management – are you saying this is the reason for the increase in the pollutant load in the Harbour??
	Ninth para	Reference to 'there is no threshold level..through to unacceptable condition"..Question is - 'Why Not'?
		More generally there is concern that we are being asked to take on board terms like 'will likely parallel the rate etc. and ' 'trust us with the information' which is difficult when so much hasn't really been measured.
3. Objectives	Page 3	<ul style="list-style-type: none"> <li>Develop KPI's for the Harbour. Have as first dot point and add to list also -</li> <li>Undertake further investigation into appropriate Darwin Harbour pollutant level objectives</li> </ul>
4. Management Actions	Page 3	Reference second dot point. What does 'with an enhanced ability to manage stormwater' actually mean?
1 The State of Darwin Harbour	Page 6 Second para Third para	Confusion as here it refers to the quality of the water in the Harbour as being 'generally high' yet an issue of not being high in other parts of the DRAFT. In regards to this paragraph, it should be noted that these are mainly in the low pollutant areas i.e. rural areas.
2. The Vulnerability of Darwin Harbour to Future Pollution 2.1 Population	Page 7 Third para	I wonder if this could be reworded to be a little less offensive and with a bit more 'upside' to assist education of how not to pollute and how to be better with everyday life, waste and recycling. There is also perhaps the same tone in the final para on page 7 which sees that the increase in pollution as 'inevitable'.
2.4	Page 12 Eighth para	Reference to 'Urbanised areas of a catchment produce a greater proportion of runoff....." This needs a rethink in expression as the entirety of what is being said is not necessarily correct. There is more infiltration in urban areas at times also.

General comments
Thank you for the opportunity to comment on your May 2014 DRAFT Document. Comments in regards to various sections of the DRAFT Strategy are made specifically in the section above.

## General comments

### Additional General Comments:

1. A strong message that Council wishes to impart is the importance of working with and seeking the support of the community in addressing matters of Darwin Harbour Water Quality. By inclusion and engaging adequately, members of the community can be the best advocates to both being better responders in what they are doing to what is affecting the water quality, while also through ownership of such engagement, the matter of watching, they can also provide the 'on ground eyes to report quickly if there is any change happening to the waterways in their location.
2. Council anticipated there would have been a **Key Actions Table** in the Strategy Document, as whilst it too would have been covered off by being of DRAFT status, it would have however given the reader some sense of what was being considered by the NT EPA as a way forward. The current Management Actions under Number 4 don't do other than provide text to begging the question, whereas the reader would like a better sense of work being considered or undertaken by NT EPA as a direction to stakeholders.
3. Water Sensitive Urban Design (WSUD) has been incorporated into several new urban subdivision of the Greater Darwin area – the driver being concerns about water quality into Darwin Harbour. However, there are still questions about the effectiveness of these designs as they are more 'southern centric' in style and questions about the effectiveness of these designs remain, particularly as we are in a strongly monsoonal climate in the Top End. The major rationale for construction of the WSUD's is to improve the water quality of suburban runoff into the marine environment with much of the drainage systems flowing through mangroves closer to the harbour.

However, the tropical monsoonal climate produces dramatic extremes of a long dry season and the sporadic high peak water flows in the wet season. Whether the design of the WSUD's in and around the Darwin Harbour region are capable of handling the peak flows of monsoonal rain events and whether they achieve the desired water quality outcomes is an issue still requiring investigation. Much more investigation, monitoring and evaluation of the current WSUD's is required.

4. The City of Palmerston has a Lakes System in the City which provides amenity and aesthetics for residents. Importantly also the series of lakes are designed to manage peak water flows in the wet season, provide water quality performance and to be available for irrigation of the parkland around the lakes. The efficiency of the City of Palmerston Lakes system is more environmentally and economical effective than the introduction of some of the existing WSUD's systems.
5. Council is also of the opinion that the greater matters of appropriate development and activities further away, and not directly adjoining the Harbour, have not been adequately considered in terms of their effect from the sub-catchments and subsequent impingement on the

**General comments**

Harbour Water Quality. For example development of Wedell and other satellite cites in the upper reaches carry with them inherent water quality issues due to their location but the urbanisation of the Mandorah/Wagait area appears to have clear advantages due to the improved flushing achieved when near the harbour mouth

6. Council looks forward to being appraised of the outcomes of submissions to the NTEPA 'A Stormwater Strategy for the Darwin Harbour Region' and what actions the NTEPA sets in place.