Consultation Report

Urban Water Directions Statement December 2021





Department for Environment and Water

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1 Introduction

Water is critically important to the lives and livelihoods of every South Australian. While our water resources are well managed and Adelaide and other major centres already have high levels of water security, the government recognises there are a number of emerging challenges and opportunities that require a more integrated approach to deliver urban water services that South Australians expect.

To facilitate discussions and seek feedback from key stakeholders, the Department for Environment and Water prepared a discussion paper: *Setting our future urban water directions: Delivering integrated urban water management for the benefit of South Australia.* The paper provides an overview of the urban water management issues facing South Australia's urban areas, and summarises some challenges and potential opportunities associated with: water supply planning; providing for flood mitigation and other stormwater management services that will be needed in the future; and ensuring water strongly contributes to our cities and towns as healthy, green and climate resilient places.

In addition to the paper, three support papers were also released that contain more detailed information. These were:

- Support Paper 1: Water supply for the future All options on the table
- Support Paper 2: Drainage and flood management Managing our rain for the next century
- Support Paper 3: Water for life Water to support healthy and enjoyable urban living.

The papers included feedback questions to elicit responses on issues covered by the papers and any additional issues stakeholders considered appropriate to raise regarding the future management of urban water resources and services.

This consultation report provides an overview of the consultation process and feedback received.

The consultation process complements consultation that was undertaken on the Water Security Statement, which focused on the primary issue of South Australia's long term water security.

2 Consultation Process

Setting our future urban water directions and the three support papers were released in late August 2021 for targeted feedback from state agencies, local government, the water industry, and non-government organisations with interests in the role that water plays in supporting South Australia's social, economic development and enhancing our natural environment.

The papers also contained questions aimed at eliciting views concerning opportunities for addressing issues raised in the papers. A list of organisations invited to consider the papers is provided in Appendix 1; a stakeholder response template with the questions is included in Appendix 2.

Stakeholders were provided a copy of the papers via email with details on how to provide feedback. All submissions were invited via email or post to the Department for Environment and Water (DEW). The papers were also made available for download from the DEW website.

Department staff met with representatives of organisations to discuss the issues addressed in the papers and answer any questions. Additional information was also available on request by phone and via email.

Forums were held with:

- Stormwater South Australia¹, Water Sensitive SA², and Resilient East³ (joint forum held at the Glenunga Hub, on 8 September 2021) (approximately 40 attendees)
- Local Government (joint workshop organised by the Local Government Association of South Australia with metropolitan and regional council staff, and the Local Government Association Mutual Liability Scheme (joint forum) (approximately 15 attendees).

Meetings were also held between the Department for Environment and Water and the following organisations:

- SA Water Corporation
- Environment Protection Authority
- Essential Services Commission of South Australia
- Urban Water Utilities Australia
- Green Adelaide Board
- LEGATUS Group
- General Managers, Regional Landscape Boards
- Executive Officers, Regional Local Government Authorities.

3 Submissions

A total of 24 written submissions were received during the consultation period. Submissions were received from state and local governments, water retailers, peak bodies, private industry and individuals. A list of submitters is provided at Appendix 1.

Submissions were broken down into comments categorised by topic and each comment was considered when finalising the Urban Water Directions Statement. An overview of the key issues raised is provided in the following sections.

3.1 Vision for urban water management

There was strong stakeholder appreciation of the papers in terms of their scope and the level of detail they contained regarding the opportunities for advancing integrated urban water management for the benefit of South Australians. Interest was expressed in the State Government setting an overarching direction. Examples of feedback include:

"[We] welcome the State Government implementing a key action from its Climate Change Action Plan 2021-2025, being to develop an integrated Urban Water Management Framework... [We] recognise the importance of the research and consultation being undertaken through the Setting Our Future Urban Water Directions papers" – Local Government Association of South Australia

"The Hills and Fleurieu Landscape Board supports the development of a state level strategic direction for an integrated approach to urban water management for South Australia's towns and cities" - Hills and Fleurieu Landscape Board

"These [papers] are excellent and crucial..." - Mr Richard Clark

¹ An industry group representing South Australia's stormwater industries and practitioners

² Water Sensitive SA (South Australia's water sensitive urban design capacity building program supported by Green Adelaide and the majority metropolitan Adelaide councils)

³ Resilient East (a local government based climate resilience group based in Adelaide's eastern council. Its partners include the Cities of Campbelltown; Adelaide; Burnside; Norwood, Payneham and St Peters; Prospect; Tea Tree Gully; Unley; and Walkerville. Green Adelaide is also a partner organisation as is the State of South Australia via a 2020 sector agreement entered into pursuant to the *Climate Change and Greenhouse Emissions Reduction Act 2007*.)

"The landscape board recognise that the state will need to embrace the use of alternative water sources to secure water supplies and there are good opportunities to do this..." – Murraylands and Riverland Landscape Board

"This is a timely and important policy development process... We urge the State Government and the Department for Environment and Water to embrace this policy development process with the urgency and importance that it deserves" – Conservation Council of South Australia

"It is encouraging that these discussion papers have been released at a time when we are not in drought as it should allow for more detailed consideration of the various aspects of future urban water directions and water security than might otherwise occur under the pressure of responding to a severe drought..." – ERA Water (recycled water supplier)

"SA Water is supportive of the development of an Urban Water Directions Statement with strong alignment to Our Strategy 2020-25. Our shared commitment to consider all water sources through integrated water management and explore opportunities to create greener, cooler communities will help ensure that our urban areas remain desirable places to live and work for generations to come... The Urban Water Direction Statement should be, in our view, a cornerstone in the establishment of a guiding framework that will allow SA Water to implement Our Strategy 2020-25" – SA Water Corporation

"The EPA is supportive of the urban water policy papers and the need for integrated approaches to meet the growing future challenges of climate change population growth and changing development patterns" – South Australian EPA

3.2 Water supply for the future

Many comments received suggest that stakeholders value an 'all options on the table approach', without any pre-emptive preclusion of any potential water supply option. No dissenting comments were received. An all options on the table approach also includes consideration of the full range of benefits of any given supply option. An approach with open and transparent consideration of all potential water supply options, including that highly purified recycled water should be one prospective option among other potential sources for drinking water, does not preclude a proper consideration of public health risks and the need to ensuring a very high level of public confidence in the quality and reliability of their drinking water supplies.

This approach is also consistent with views expressed by the Productivity Commission for 'all options on the table' approach and (through the Water Services Association of Australia) by a view advocated by Australia's major urban water utilities.

Example quotes from feedback include:

"SACOSS is strongly supportive of an approach to future water supply which considers 'all options on the table'..." – South Australian Council for Social Services

"All options are of interest ... " - City of Mitcham

"Genuine consideration of supply diversification at an early enough stage of infrastructure planning is difficult while the institutional and market inertia for augmentation of the highest quality (potable) water is so challenging to overcome" – Light Regional Council

"The overarching measure that needs to be applied is what price people are compelled to pay..." – Water Utilities Australia

"The consideration of environmental impact of options included in a decision making framework, is supported" – Environment Protection Authority

"Water Security is a significant concern for the towns and cities of the Hills and Fleurieu regions where the River Murray is the major urban water resource and the provision of more options on the table for these rapidly growing towns and cities should be catered for." – Hills and Fleurieu Landscape Board

"Appropriately accounting for and funding externalities and public good outcomes at an early stage of infrastructure development is key" – Light Regional Council

3.3 Drainage and flood management

Stakeholders with an interest in urban flooding and multi-objective stormwater management expressed their desire to engage with the State Government about ways to address emerging flooding risks and challenges (such as climate change leading to increased rainfall intensity, and higher sea levels that may increase stormwater flooding risk in low lying coastal areas), increased urban densification (which may increase impervious area runoff), and ageing drainage assets, while also seeking to progress stormwater solutions that provide better socio-economic and environmental outcomes. Stakeholders also concurred with the paper reflecting that there are challenges in South Australia that relate to lack of clarity around explicit roles and responsibilities of those with an interest in managing stormwater. Examples of feedback include:

"The LGA notes the potential challenges... and acknowledges that improving the current arrangements will require the agreement of stakeholders as well as concerted long-term effort... Roles and responsibilities in stormwater management need to be identified and clarified to enable efficient review and risk assessment... there is a growing trend interstate and internationally of centralised bodies... having management or oversight of major stormwater infrastructure supported by a regulated, economically efficient funding model..." – Local Government Association of South Australia

"Clarify responsibility for urban drainage ... " - City of Charles Sturt

"The management of natural watercourse areas in partnership with stormwater and drainage management should be integrated to preserve natural values and ecological assets that are important to the community members of the towns, cities and downstream rural areas" – Hills and Fleurieu Landscape Board

"ERA Water supports the position put forward in the paper with regard to the key challenges identified" – ERA Water

Stakeholders generally indicated a willingness to engage in processes to resolve these challenges, and were not averse to there being some consideration of stormwater management models that apply in some other Australian and international jurisdictions which purportedly offer a better basis for better distinguishing stormwater management responsibilities of private land owners, local government and stormwater trunk drainage managers.

3.4 Water for life

Most stakeholders provided feedback about water practices that could be used to support healthy and enjoyable urban living. Most respondents support and offered ideas about how water might be delivered to provide for urban greening and urban cooling outcomes. These included suggestions for further encouraging fit-for-purpose water supplies to provide water for urban greening, adopting smart water efficient practices, redesigning streets to facilitate urban greening, and promoting the uptake of local stormwater measures such as kerbside stormwater inlets and street raingardens that could capture a proportion of urban runoff for uptake by street trees and other plants. Example of feedback include:

"Invest in diversified, fit-for-purpose water supplies..." - City of Adelaide

"A range of opportunities will need to be adopted ranging from the very local opportunities such as rain gardens and tree inlets to increasing the use of stormwater harvesting schemes and investigating opportunities to extend the use of wastewater... Where feasible dry grass and/or bare ground should be irrigated in order to reduce its warming effect... [and] green infrastructure should be irrigated in order to maximise its cooling effect " – ERA Water

"Development of fit-for-purpose water... including recycled water... [and] use of technology including water sensors ensuring that water is provided when and as needed... Using our watercourses as multiple layered, productive corridors – connected tree canopy cover and habitat and biodiversity, urban heat island mitigation, rainwater capture, storage and reuse" – Premier's Climate Change Council

"Communities need to be involved in planning and implementing local/regional water solutions for delivering better towns and cities" – Light Regional Council

"New builds require a rainwater tank, but are not fully used..." – Murraylands and Riverland Landscape Board

"[Urban cooling through increasing] trees, open space, misting, source control, water sensitive design, improved building regulation" – Mr Richard Clark

"[Provide water through] "third party access to water supply networks, facilitated by technology to purify stormwater for council-managed aquifer recharge schemes will be key" – Water Sensitive SA (based on views expressed by participants of the Glenunga forum held on 8 September 2021)

3.5 Aboriginal water interests

Several submissions suggested there would be a need to recognise the rights and aspirations of First Nations peoples in advancing urban water directions. The views of First Nations peoples were not explicitly canvassed during the consultation process. However, a number of stakeholder entities have close relationships with representatives of First Nations peoples (e.g. regional Landscapes Boards, local governments, and non-government organisations such as the South Australian Council for Social Services) and First Nations interests will be important to account for when advancing the proposed actions contained in the urban water directions statement.

In parallel with the Urban Water Directions Statement, the *Water Security Statement* discusses the importance of water to First Nations peoples for health, cultural and economic purposes, and identifies work the state government is doing to support a revised National Water Initiative and support progress towards including First Nations people's values and needs for water in water allocation plans (WAPs).

3.6 Strategic priorities in the Water Security Statement

Submissions received on the draft Water Security Statement indicated broad support for the strategic priorities of that draft strategy; however, as part of that consultation process, a number of additional priorities were also recommended, including that of engaging the community to raise awareness of the use of recycled water around the world. The Urban Water Directions Statement supports stakeholders' interests in engaging with South Australia's metropolitan and regional communities to raise awareness of urban water issues that will help their personal water management and facilitate broader public good outcomes arising from water management, including enhanced water security, environmental protection, and smart water practices to support greener, cooler neighbourhoods.

Appendix 1 – List of stakeholders

In addition to the organisations invited to comment below, the Local Government Association of South Australia promoted and circulated the discussion paper to all local governments through their networks.

Name / Organisation	Written response received
Conservation Council of South Australia	Yes
City of Adelaide	Yes
Premier's Climate Change Council	Yes
Department for Environment and Water (Flood Management Team)	Yes
ERA Water	Yes
University of Adelaide (Dr Graeme Dandy)	Yes
Light Regional Council	Yes
Murraylands and Riverland Landscape Board	Yes
SA Council for Social Services	Yes
Stormwater Management Authority	Yes
Resilient East	Yes
City of Mitcham	Yes
Space Down Under Pty Ltd	Yes
City of Onkaparinga	Yes
Water Utilities Australia	Yes
Water Sensitive SA	Yes
Local Government Association of South Australia	Yes
Environment Protection Authority	Yes
City of Charles Sturt	Yes
Hills and Fleurieu Landscape Board	Yes
SA Water	Yes
Mr Richard Clark	Yes
Mr Michael O'Flaherty	Yes
City of Salisbury	Yes
University of Adelaide (School of Architecture representative with knowledge of urban heat/urban cooling)	No
Australian Institute of Landscape Architects (SA Chapter)	No
Business SA	No
Australian Bureau of Meteorology	No
Department of Health and Wellbeing	Yes
Department of Education	No
Essential Services Commission of South Australia	Meeting held
Green Adelaide	Yes
Goyder Institute for Water Research	No. The Goyder Institute has established an expert panel to consider how its urban water related agenda might contribute to address issues and opportunities raised <i>Setting our future urban water directions</i> paper.
Managed Aquifer Recharge Users Group	No. There has been ongoing engagement between DEW and the MAR Users Group.
SA State Emergency Services	No

Name / Organisation	Written response received
Stormwater SA	Stormwater SA participated in a workshop at Glenunga Hub in September 2021. Views made by its participants to that forum were subsequently captured and reported by the submission coordinated by Water Sensitive SA.
Treenet	Yes, through feedback received from Space Down Under Pty Ltd.
Water Research Australia	No
Water Industry Regulators Group (SA)	Discussions concerning the Urban Water Directions Statement have occurred through DEW engagement with the Water Industry Regulators members.
Regional Climate Change Adaptation coordinators (SA)	Feedback was received from Resilient East. Feedback was also received from some other organisations involved in progressing climate adaptation action (e.g. the Cities of Onkaparinga, Marion; Light Regional Council; Local Government Association, and Water Sensitive SA)
Regional Landscape Boards	Written responses were received from two Landscape Boards.
Legatus Group	Input provided through meeting
Water Services Association of Australia	No formal submission however WSAA has identified its strong alignment between its interest in Liveable Cities agenda for urban water and matters addressed by the <i>Setting</i> <i>our future urban water directions</i> paper.

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