

**Daniel Smith**

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**From:** The Premier (Ministerial)  
**Sent:** Tuesday, 19 February 2013 10:30 AM  
**To:** The Premier  
**Subject:** FW: Request for meeting with The Hon Campbell Newman MP, Premier of Queensland - The Mantle Group

Can this please be registered and sent up ASAP to be actioned urgently?

Thank you



**Bec McCoan**  
Administration Officer  
Office of the Hon. Campbell Newman MP | Premier of Queensland  
Phone: 07 3224 4363 | Fax: 07 3221 1809 | Mobile: [CTPI]  
Executive Building | 100 George Street | Brisbane | QLD 4000  
PO Box 15185 | City East | Brisbane | QLD 4002  
**Great State. Great Opportunity.**

**From:** Santo Santoro [mailto:santo@santosantoro.com]  
**Sent:** Monday, 11 February 2013 11:35 AM  
**To:** Premier  
**Cc:** Ben Myers; Peter Walsh; 'Mark Powell'  
**Subject:** Request for meeting with The Hon Campbell Newman MP, Premier of Queensland - The Mantle Group

Dear Premier

I would be grateful if you could find the time to meet with [CTPI] from The Mantle Group, a client of Santoro Consulting registered on the Queensland Lobbyist Register.

As you may be aware, the Mantle Group is a Queensland-based group of companies and trusts 100% privately owned by the family of Godfrey Mantle. The business investments of the group include property, hospitality, education & training and agriculture, including the Queen Street Mall restaurants, Pig N Whistle and Mayfair College in Brisbane, and the Noosa on Weyba and Rise developments, amongst others.

I understand that during your recent trade mission to India, [CTPI] discussed with you his efforts to attract foreign investment into his hospitality businesses. These investment will provide a significant contribution to the growth of the tourism pillar of the economy that has been a central point of focus for the Queensland Government. [CTPI]

[CTPI]

Much of the media and public commentary around liquor and gaming reforms in Queensland has assumed new casino licences will be issued for sites in the CBD of Brisbane and the Gold Coast.

CTPI

CTPI

CTPI

We

would be grateful if you could let me know the best person to contact in your office to make arrangements for a meeting or please ask them to give me a call.

With sincere thanks in anticipation of your kind assistance,

**The Hon Santo Santoro**

**Director**

**Santoro Consulting**

**Ph: 61-7-3262 4266**

**Fax: 61-7-3262 9965**

**Email: [santo@santosantoro.com](mailto:santo@santosantoro.com)**

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**Postal Address:**

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RTI RELEASE



## Premier of Queensland

For reply please quote: EP/AP – TF/12/24340 – DOC/12/182154

- 2 OCT 2012

The Honourable Santo Santoro  
Director  
Santo Santoro Consulting  
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Website [www.thepremier.qld.gov.au](http://www.thepremier.qld.gov.au)

Dear Mr Santoro *Santo*,

Thank you for your email of 5 September 2012 about your client, Solar Dawn.

Over the next six months, the Government will be developing a 30-year plan for Queensland's energy sector. Obviously, any long-term plan on energy will need to examine how the Government can best meet future power needs, including the role of renewable energy in a state which has world-class renewable resources in solar, geothermal, biomass and wind.

I have also established an inter-departmental committee and an independent review panel to deliver expert advice to the Government on the best way to keep prices as low as possible for all Queenslanders, and how best to improve the electricity sector.

The independent panel has three expert members who have years of experience with electricity supply, both within government and the private sector. The panel's work is part of the Government's commitment to implement electricity tariff reforms to tackle rising energy costs. The Government will be looking at all aspects of the electricity sector, including network costs, electricity supply and retail competition.

As you know, Queensland is facing a significant challenge to return the Budget to surplus due to the mess left by the former government. Because of this, the Government currently has no funds available to contribute to new renewable energy projects. However, the Queensland Government is committed to assisting Queensland companies in gaining access to federal funding for major renewable projects.

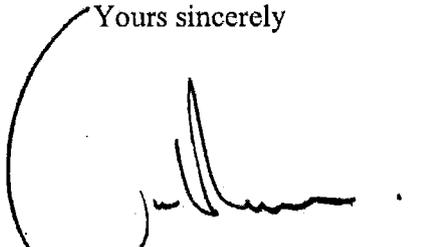
Unfortunately, due to my heavy schedule, I will be unable to meet with you at this time. However, I understand that both the Office of the Honourable Mark McArdle MP, Minister for Energy and Water Supply, and my office have met with your colleague, Mr Mark Powell, and AREVA to discuss your proposal.



**Queensland**  
Government

Thanks again for taking the time to write to me.

Yours sincerely



CAMPBELL NEWMAN

RTI RELEASE

**Daniel Smith**

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**From:** Premier [premier@ministerial.qld.gov.au]  
**Sent:** Wednesday, 5 September 2012 4:43 PM  
**To:** The Premier  
**Subject:** FW: Solar Dawn - Developing a Solar Power Industry for Queensland

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**From:** Santo Santoro [mailto:santo@santosantoro.com]  
**Sent:** Wednesday, 5 September 2012 4:09 PM  
**To:** Premier  
**Cc:** Ben Myers  
**Subject:** Solar Dawn - Developing a Solar Power Industry for Queensland

Dear Premier

I write to seek your support for the creation of a solar power industry in Queensland.

I am confident that with your support, we can assist in the delivery of LNP election policies on energy and cost-of-living by securing a future high-tech industry for Queensland, using private sector and Federal Government investment, including significant investment in local research and development through the University of Queensland.

Our client, Solar Dawn, is a consortium made up of two of the largest and best known global energy and alternative energy companies AREVA Solar and Wind Prospect CWP, as well as a range of other global investors including sovereign wealth funds. Originally, Solar Dawn was proposed as a Billion dollar infrastructure project to build a 250 megawatt solar thermal power plant near Chinchilla, in the Western Downs region of Queensland.

The Federal Government had pledged nearly \$500 million in support of the project, in addition to over \$600 million in private funding which had also been secured. However, primarily because a long term power purchase agreement could not be reached with any of the Queensland power retailers in the current environment, the Queensland Government withdrew support that had been promised by the former Government and recently, Solar Dawn was advised by the Australian Renewable Energy Agency (ARENA), the Federal Government agency which has taken over the Solar Flagships program, that the funding agreement has been cancelled.

CTPI

I acknowledge the many demands on your time and attention, particularly as the budget will be handed down soon, but hope you will agree the enormity of undertaking such as that contemplated, and the prospective benefit to Queensland, warrant our request for the involvement of you and your office. As a first, step, I would greatly appreciate the opportunity to speak with you or your Chief of Staff to get an understanding of the appropriate next steps, and will contact Ben Myers in the coming days for this purpose. Please don't hesitate to contact me in the meantime.

With warm regards and sincere thanks in anticipation of your assistance

**The Hon Santo Santoro**  
**Director**  
**Santo Santoro Consulting**  
**Ph: 61-7-3262 4266**  
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**Daniel Smith**

**From:** Mark Powell [mark@santosantoro.com]  
**Sent:** Monday, 3 December 2012 8:33 AM  
**To:** Adrian Jeffreys  
**Subject:** Request for meeting with Executive Director, Environment and Resources Policy, Department of the Premier and Cabinet - Stormwater360  
**Attachments:** SW360 Single SPP Water Quality.pdf; ATT00001.htm; SW360 Company Profile.pdf; ATT00002.htm

Dear Mr Jeffreys

I would like to arrange a meeting between you and [CTPI] from Stormwater360, a client of Santoro Consulting registered on the Queensland Lobbyist Register.

[CTPI] met with Minister Powell and his Chief of Staff, Mr Troy Collings last week in relation to current reforms being considered to water sensitive urban design regulations and in particular, the work on planning reform being undertaken by Assistant Minister Walker. Some additional information on this matter is contained below in our original email to the Minister, as well as in the attached briefing note prepared for that meeting.

During our discussion with Minister Powell, he mentioned that we should also brief the relevant people in your Department in relation to the work on Great Barrier Reef. I spoke to Mr Collings this morning and he referred me to you and gave me your contact details.

Ahead of any potential meeting, I thought it might be best for us to discuss this matter briefly on the phone. Can you please advise a convenient time, or otherwise give me a call?

Kind regards

Mark Powell  
Partner  
Santoro Consulting

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# Planning reform

Single SPP - Water quality

Our waterways. Our future.

Stormwater360  
AUSTRALIA

## Executive summary

- > Stormwater360 Australia (100 % Australian owned) has worked in the Stormwater Management industry for over 10 years in Australia, New Zealand and North America. Stormwater 360 provides turnkey solutions to managing the effects of urban runoff and its associated pollutants.
- > Urbanisation increases stormwater runoff and the transport of pollutants into our waterways. This includes gross pollutants, sediment and nutrients which are proven to have a detrimental effect of downstream ecosystems.
- > Research shows that marine and waterway health are the most significant concern of residents of South-East Queensland in relation to population growth (TNS Social Research, 2010).
- > The current policy and regulatory framework encompassing Water Sensitive Urban Design (W.S.U.D) are essential to maintaining marine and waterway health, but have been identified by some as regulatory burden on development in Queensland. In Queensland, the key component of that framework is State Planning Policy 4/10 Healthy Waters (SPP 4/10)
- > Since the adoption of SPP 4/10, Queensland's regulatory framework provides the most streamlined approach to the implementation of the management of stormwater quality anywhere within Australia, leading to the shortest development approval timeframes.
- > The Newman Government is currently seeking to streamline the development approval process by amending a range of policies under the Sustainable Planning Act 2009, having indicated a desire to merge the current 12 State Planning Policies (SPP) into a single SPP document and simplified regulations to drive an efficient development approval process. Stormwater 360 fully supports this process, provided that environmental outcomes, especially as they relate to stormwater management, are maintained.

## Outcomes sought

1. The new single SPP must have the same scope and effect of SPP 4/10 as they relate to stormwater management and empower local government to ensure compliance by enabling them to enforce stormwater treatment standards for proposed developments. The minimum requirements that must be maintained to achieve this objective are:
  - > Ensure the scope of the policy applies to all developments greater than 2500m<sup>2</sup> or six or more additional dwellings.
  - > The implementation of the policy is achieved through a single state-wide Master SPP requirement, administered by local government through the development application approval process.
  - > Ensure that water quality objectives as referenced in the current Urban Stormwater Quality Planning Guidelines 2010 are adhered to.
  - > Any innovative technology is assessed in accordance with the Water by Design MUSIC modelling guidelines document.
2. That the overall system maintain a mandatory, user-pays, site specific stormwater treatment requirement.
3. Expansion of 'deemed to comply' solutions to include a new technology certification program that enables innovative technologies to be included in this process. The technology certification program could be based upon an amended version of the Water by Design MUSIC modelling guidelines document.

The effects of urbanisation negatively impact aquatic ecosystems by increasing both stormwater pollutant loads and stormwater flow. Pollution loads increase proportionally with the degree of urbanisation in the catchment area. Stormwater pollutants can take several forms such as gross pollutants or litter, which can be easily visualised to fine suspended solids, or nutrients, which cannot be seen as they can be soluble in solution.

Regardless of the pollutant, in high concentrations or quantities they can all have a profound detrimental effect on both the flora and fauna within, or reliant on, the receiving waterways. In order to manage these effects, sustainable urban water management is implemented through a process called Water Sensitive Urban Design (WSUD). WSUD (see Figure 1) is a land planning and engineering design approach, that integrates the urban water cycle, including stormwater, groundwater and wastewater management, and water supply, into urban design to minimise environmental degradation and improve aesthetic and recreational appeal.

In 2001, the South East Queensland Healthy Waterways Partnership (SEQHWP) was established to provide independent advice and collaboration between government, industry, research organisations and community. The partnership works to improve the water quality of South-East Queensland and in particular Moreton Bay by significantly reducing not only sediment, but more importantly, nitrogen load into Moreton Bay. In 2005 the SEQHWP established the Water by Design program to provide capacity building for both the urban development and water sector to support the uptake of WSUD.

Federal, state and local government regulators in Australia, and around the world, have identified the need to regulate stormwater pollution. For example:

- NSW Environmental Protection Authority (EPA, 1997)
- VIC Environmental Protection Authority (BPEMG, 1999)
- QLD Department of Environment and Resource Management (DERM, 2009)
- USA Environmental Protection Authority (Clean Water Act 1986)

In 2009, the then Queensland Government recognised the need for greater governance of stormwater pollution, leading to the Draft State Planning Policy for Healthy Waters, designed to be a core part of a range of initiatives and regulations designed to address these issues. The framework of this plan is shown in Figure 2.

Figure 1: The water balance, urbanisation and WSUD (Source: National Water Commission)

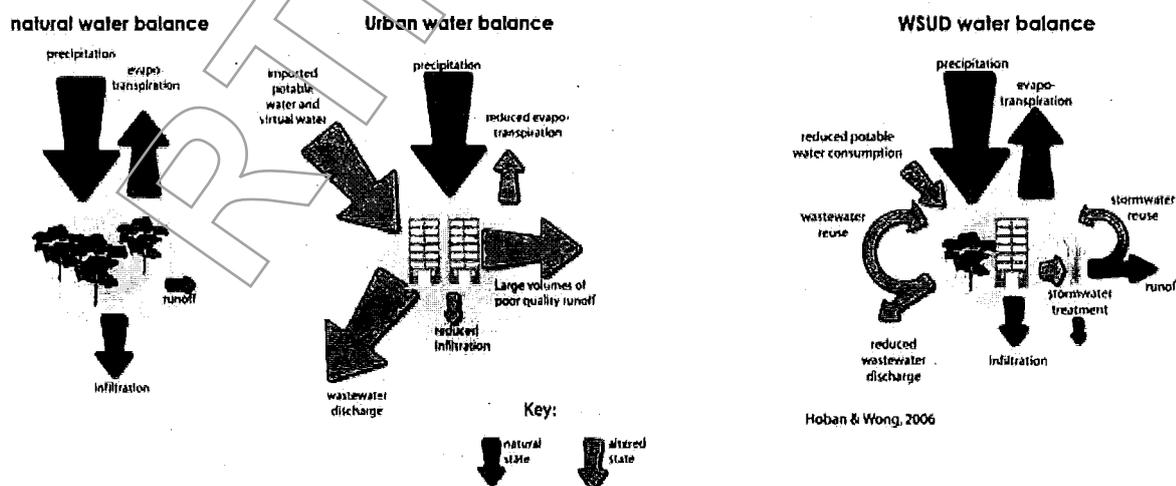
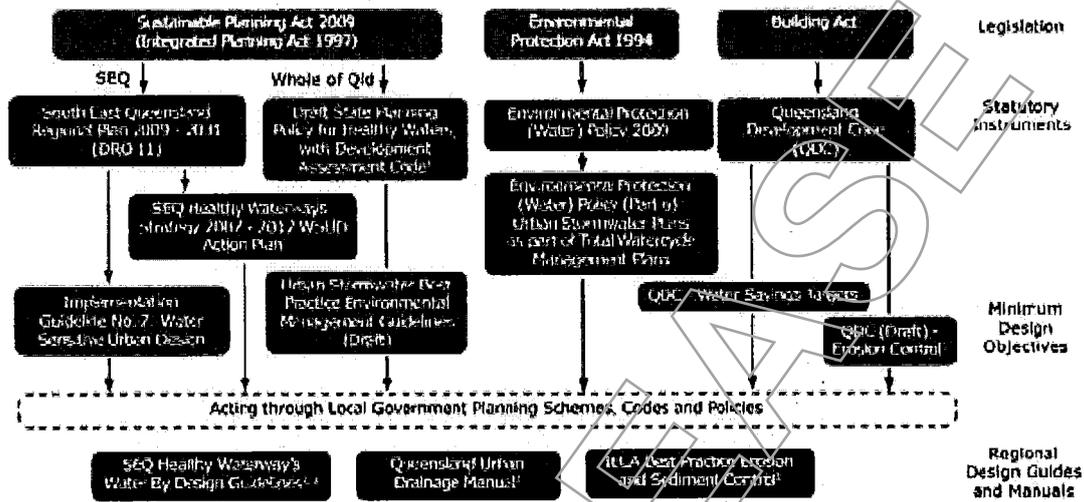


Figure 2: WSUD Management Policy & Regulation Ecosystem (Source: South East Queensland Regional Plan 2009–2031)



These guidelines incorporate nationally (generally) agreed water quality objectives together with succinct selection criteria to simply determine the applicability of these standards to any development. No other jurisdiction in Australia has a single unified set of design guidelines and objectives. For example, Sydney has 42 local government entities with varying degrees of design objectives and degrees of regulation in their planning schemes. Queensland therefore leads the way in providing clarity and transparency of a single set of requirements in this regard, speeding up the assessment process.

State Planning Policy 4/10 Healthy Waters came into effect in 2011. The policy set minimum requirements and criteria to be established within each local government's development planning schemes. If a planning scheme for urban stormwater management was not in existence at local government, then SPP4/10 would form the basis of the planning scheme with respect to stormwater until such time one was developed by the local government authority.

**Issues description**

Following the election of the Newman Government and the implementation of the Six Month Action Plan, the government sought to grow a Four Pillar Economy through focusing on tourism, agriculture, resources and construction and by cutting red tape and regulation. This included the appointment of The Hon Ian Walker MP as Assistant Minister for Planning Reform, tasked with working:

*with the Deputy Premier in a leadership role to review the Sustainable Planning Act to make it the most cost efficient, time effective planning framework in Australia. In addition, I expect that you will take a role in assisting the Deputy Premier's work in encouraging the growth of the property and construction industry. (Assistant Minister's Charter Letter)*



An example of eutrophication which results from stormwater pollution

As a result of these and related commitments, there have been significant reforms to sustainable planning regulations and processes foreshadowed.

Stormwater360 has worked in the WSUD space for over 10 years throughout the eastern states of Australia as well as New Zealand. Since the adoption SPP 4/10, the Queensland system provides the most streamlined approach to the implementation of WSUD anywhere within Australia, leading to the shortest development approval periods. The clear, standard approach provided by SPP 4/10 provides councils with the certainty to determine development applications quickly and consistently. Therefore, we feel confident that this regulation provides significant environmental benefit without being 'green tape'.

*"The State Planning Policy for Healthy Waters 4/10 (SPP HW) is a key policy for ensuring stormwater on development sites is managed to protect waterway health. With significant future development planned in Queensland, the policy is essential for protecting the environmental, social and economic values of our waterways, which are intrinsically linked."*

*Nicole Ramlio – President  
Stormwater Industry Association Queensland*

However, issues in the operation and measurement of WSUD standards have been identified by both local government and consulting engineers. That is, it is not the approval process and implementation of WSUD that is at issue, but the management of stormwater quantity and flows. SPP 4/10 establishes clear criteria and objectives and a unified set of common tools to implement WSUD, however, the management of quantity involves a range of different software programs with varying methods in determining stormwater attenuation volumes to mitigate flooding. One council recently stated:

*if you look into the problem, water quality management is straight forward and rarely causes any issues... water quantity management is where the assessment timeframe can be severely affected... (Local Government Manager, South East QLD Council)*

That said, stormwater quality management and the implementation of WSUD are not entirely without issue. Professional developers generally understand the social and economic benefits WSUD can provide and therefore plan for and comply with WSUD requirements, integrating them into their planning and processes at the outset.

However, other developers neglect to plan and integrate WSUD within the initial stages of their development, giving rise to unplanned cost issues, physical constraints from attempting to retrofit a WSUD compliant system, ultimately leading to a loss of yield and complaints about 'green tape'. On larger developments some stakeholders cite the bureaucratic inefficiency of multiple state government bodies being involved, providing subjective and conflicting guidelines. Issues have also been identified within integration of all the services within local governments such as roads, drainage and parklands.

Other factors/issues have been identified that could potentially pose minor cost impacts on developments by implementing WSUD. These include, increased minor maintenance tasks for residents and the environmental costs associated with sourcing the materials for WSUD treatment measures.

#### Consequences and costs of change

Fundamentally, contaminants are produced and spilled, and they will enter the stormwater system. They must be dealt with by those producing them at source, typically a process regulated by local government, or ultimately will not be treated, in which case they will flow into the catchments and waterways, impacting the environment. Changing or reducing the effectiveness of SPP 4/10 would have an inevitable and unavoidable impact on the environment in a way that directly impacts the lives of Queenslanders, in their local creeks and rivers, in Moreton Bay and on the Great Barrier Reef. Research shows that marine and waterway health are the most significant concern of residents of South-East Queensland in relation to population growth (TNS Social Research, 2010). In compiling a single SPP the core values of SPP 4/10 such as scope, compliance, water quality standards and methods of assessment must be upheld. Any degradation of the policy will also have a negative impact on the environment and ultimately Tourism industry, a central component of the Newman Government's Four-Pillar Economy.

In the most recently available Report Card, produced by Healthy Waterways, the Lower Brisbane Catchment (covering the central Brisbane area) ecosystem health was assessed against water quality guidelines, as an "D+", corresponding to "Poor: Conditions meet few set ecosystem health values. Most key processes are not

functional and many critical habitats are impacted." The result is the first improvement in the last 5 years of monitoring, and arguable coincides with the introduction of SPP 4/10.

While many factors are linked to overall waterway ecosystem health, stormwater contaminants being one of many, the majority of Queensland's population, and therefore our recreation and tourism activities, are located on the coast and revolve around the rivers, creeks, beaches, the ocean and the Great Barrier Reef. Excess sediment loads attribute to coral bleaching and ultimately degradation of this major tourism asset. Excessive nitrogen loads lead to algal blooms that are toxic to aquatic plants and the mortality of animals. These blooms also effect transparency of water, produce an undesirable odour and can ultimately impact the perceived value of the bodies of water body where the majority the Queensland tourism activities are located.

*"A decline in the health and amenity of our waterways from poor stormwater management also poses significant social and economic risk implications. The annual economic value of Moreton Bay is estimated to be \$5.11 billion dollars, with tourism and recreation alone earning \$3.5 billion each year, and primary industries worth \$1.39 billion (QCC, 2011). It is therefore essential that future development be sustainably managed to protect waterway health and related economic and recreational values. The SPP HW provides a key mechanism for ensuring that this is achieved, hence it is vital that its requirements are maintained in the drafting of a new single State Planning Policy."*

*Nicole Ramlio – President  
Stormwater Industry Association Queensland*



Example of localised flooding

Many other tangible benefits arise from the proper implementation of WSUD. These include protecting the quality of ground water, avoiding the costs of rehabilitating downstream infrastructure, protection of fish stocks impacting recreational and commercial fishing, reduction of heat island effect and associated increased energy costs for cooling and the protection of social amenity.

Reducing the regulatory burden by 20% is expected to provide an improvement to the development sector in QLD. This strategy can positively and negatively impede different aspects of the Four Pillar Economy. The impacts arising from this increased development will provide substantial benefit to the building sector and ultimately the economy in Queensland. The unfortunate reality of increasing development is that it will provide more pressure on our waterway health and ultimately tourism. In managing these effects it could be possible to shift the problem to other parties or asset owners. For example, the local and state government organisations are custodians of our receiving waterways, and hence providing end-of-line/pipe style solutions may be possible, however there would be a significant cost shift from the land owner to government and moves away from a user pays system. This would also discourage land owners to try and reduce pollutant generated from their sites as there is no direct financial incentive to do so. This problem is compounded by the fact that high pollution yields are generated from sites such as Commercial and Industrial developments with residential subdivisions shown to generate lower pollutant loads over the long term.

In the case of providing WSUD for developments there is an argument that regulation actually assists the development approval timeframe and underlying costs. For example, in Sydney there is no unified strategy that is enforced across the Sydney metropolitan region. The 42 local government organisations individually manage the development assessment process in their own areas. Unfortunately, whilst the ultimate goal of protecting our waterway health is in relative agreement, the standards, treatment goals, methods of demonstrating compliance whilst are all similar may not be consistent. A recent seminar held by the NSW Stormwater Industry Association was titled "Getting WSUD through the development process in 60 days". Whilst it was thought that 60 days would be a significant achievement it highlighted the cumbersome nature of the process in NSW. Compare this for QLD where on low risk sites the process can take as little as 10 days for deemed-to-comply type solutions.

Implementation of WSUD that provides integration into the development at the local scale is desirable by urban developers and provides the best outcomes. Most of the costs and issues arise when WSUD is poorly integrated into development, commonly leading to an "end-of-line" or regional WSUD type solution. The disadvantages of this practice are that centralised regional end-of-line solutions must be located at the lowest downstream point. Consequently, they can be difficult to site, spatially inefficient, require extra earthworks by constructing large berms, increase proportional sizes due to maintenance access requirements, which all lead to reduced development yield. These assets, whilst initially being maintained and controlled by the development become the responsibility of local government over time for the long term. In most cases, developers adequately maintain these systems, as there is a direct tangible decrease in their property development values should they fail to do so.

#### Outcomes sought

We propose the following outcomes that may reduce development approval timeframes, whilst protecting downstream waterway health. These are:

1. The new single SPP must have the same scope and effect of SPP 4/10 as they relate to stormwater management and empower local government to ensure compliance by enabling them to enforce stormwater treatment standards for proposed development. The minimum requirements that must be maintained to achieve this objective are:
  - > Ensure the scope of the policy applies to all developments greater than 2500m<sup>2</sup> or six or more additional dwellings.
  - > The implementation of the policy is achieved through a single state-wide Master SPP requirement, administered by local government through the development application approval process.
  - > Ensure that water quality objectives as referenced in the current Urban Stormwater Quality Planning Guidelines 2010 are adhered to.
  - > Any innovative technology is assessed in accordance with the Water by Design MUSIC modelling guidelines document.

2. That the overall system maintain a mandatory, user-pays, site specific stormwater treatment requirement.
3. Expansion of deemed to comply solutions to include a new technology certification program that enables innovative technologies to be included in this process. The technology certification program could be based upon an amended version of the Water by Design MUSIC modelling guidelines document.

The SPP 4/10 policy has now been in effect for over 18 months, and from the latest Healthy waterways report card, it is the first time in 5 years there has been an improvement in the lower Brisbane catchment waterway health, a direct tangible benefit to the environment. Many stakeholders agree that the process under this framework is concise, especially for an approach such as WSUD that is a design methodology or planning tool which is not the implementation of one particular product or practice.

Local government development assessment compliance for WSUD can be provided in one of two ways. Firstly, by following the deemed to comply solutions for vegetated systems, which offer pre-sized and approved non-proprietary treatment options. These options facilitate a speedier development approval process, but can have limited scope and are more suitable for low risk, small development sites and can be in some situations costly. The second method of compliance is achieved via the universally accepted modelling software MUSIC. Regrettably, the current lack of regulation on stormwater device evaluation has left a large scope for manufacturers to make misleading claims about device performance. Such claims not only translate to a viable risk to the environmental safety of our waterways, but also to the design engineer's time and cost which are directly passed to the development. An approach where innovative technologies meet a selection criteria and then have scope to be implemented as an expanded part of the deemed to comply solutions would be beneficial for the assessment process. This would not only provide direct benefit to developments using the deemed to comply route, it would also free up development assessment resources for developments that detailed modelling and indirectly facilitate the reduction of assessment time for this area additionally.

## Conclusion

For the last 10 years or so WSUD has continued to evolve. The unfortunate reality is that many of the policies and codes have been developed over the same time period. As the science continues to develop, the planning schemes and guidelines within local government are either out of date or contradict other guidelines. There appears to be limited cross-pollination of policies. For example WSUD is seldom referred to within council's roadway policies yet some of the stormwater quality improvement devices are located in, or on, roadway easements. A single SPP, including the core values of SPP4/10 ensuring waterway health, helps to clarify this situation, however, the scope would benefit to being expanded to cover issues like these in all local planning schemes.

Unquestionably, the interests and core values underpinning SPP 4/10 provides protection of receiving waterways and ecosystem health. The policy provides a unified set of water quality standards across the entire state thereby ensuring a simple and easy framework to follow for all stakeholders. The Healthy Waterways report card indicates an improvement of environmental values have been achieved and the policy provides a suitable moral balance between the environment, development and the tourism industry.

Finally, Stormwater 360 are in agreement with the Queensland government's plan to encourage development in Queensland as commercially it would be advantageous for the economy and all stakeholders concerned. Careful consideration needs to be undertaken to ensure that any increased development and associated environmental effects are managed effectively to guarantee the health of Queensland waterways to the benefit of all Queenslanders and tourist alike.

## References

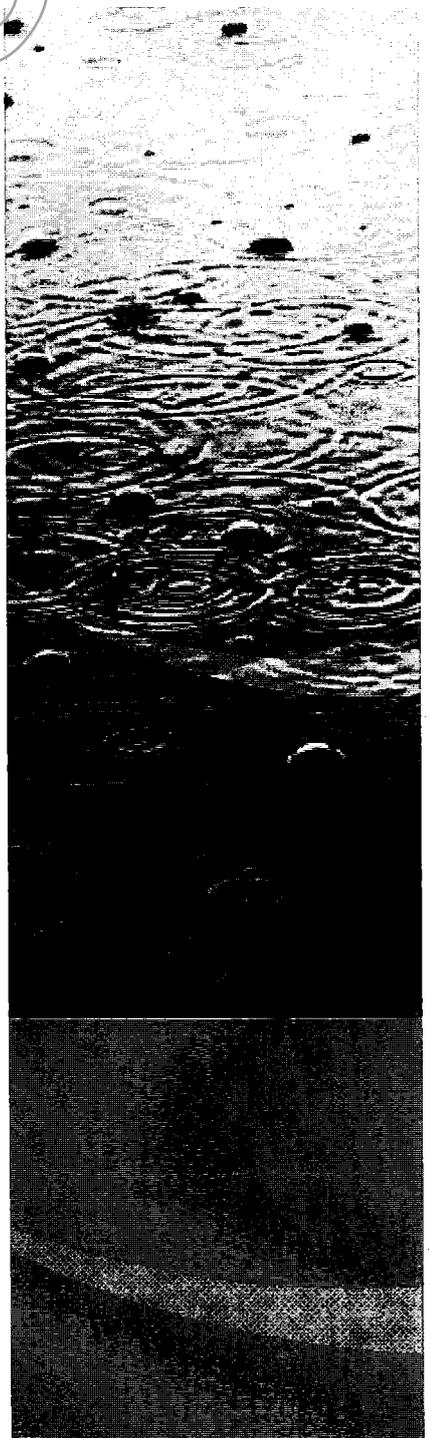
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- Bligh Tanner, 2012: Measuring and Reducing the Burden of Regulation – Submission on the Issues Paper
- Healthy Waterways: 2012 Report Card Results, <http://www.health-e-waterways.org>

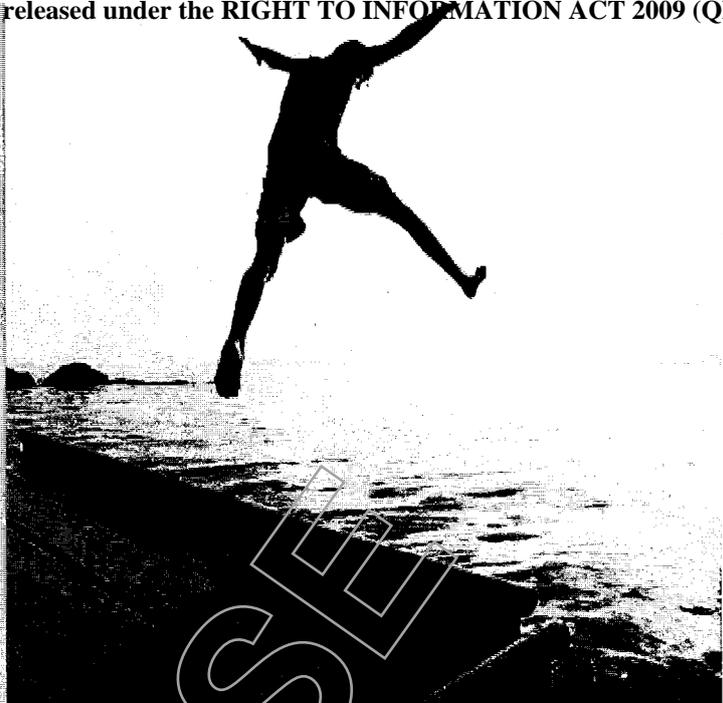
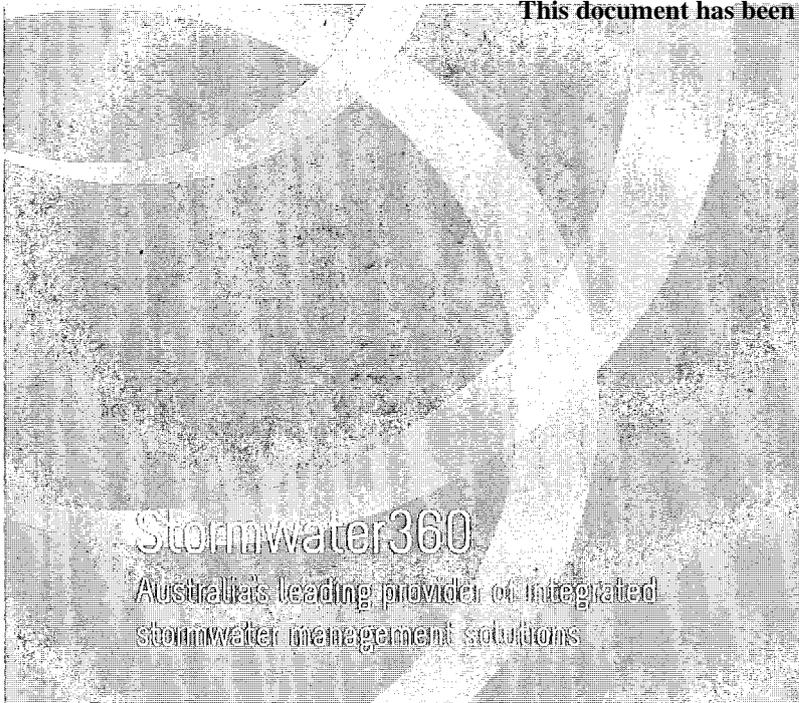
Stormwater360 supplies and maintains a complete range of filtration, hydrodynamic separation, screening and oil/water separation technologies.

Call 1300 354 722

[www.stormwater360.com.au](http://www.stormwater360.com.au)

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Established in Australia in 2001, and with a presence in New Zealand since 1995, Stormwater360 is recognised as a leader in the design, development, implementation and ongoing maintenance of highly effective stormwater management systems.

While stormwater management has traditionally focused on flood control, our comprehensive approach to this discipline recognises stormwater as a resource that has importance from a social, environmental and economic perspective.

To maximise the value of this resource, our teams based in Sydney, Brisbane and (shortly) Melbourne, bring together the expertise and experience of specialists in engineering, land management, water management and environmental science. We utilise advanced modelling technologies to design Best Management Practice (BMP) solutions, and supply world-class field-tested products that have been proven for their efficacy in pollutant removal, filtration, harvesting and detention.

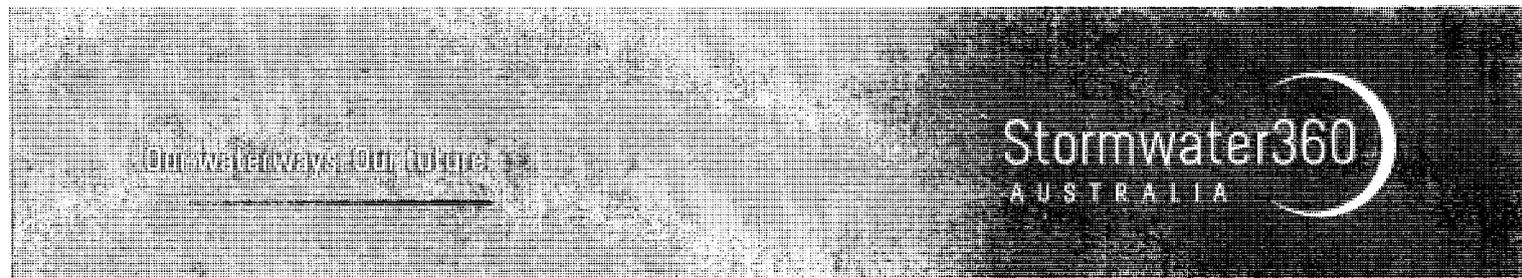
Stormwater360 develops systems and solutions that remove toxic contaminants in stormwater runoff from: entering the groundwater; disturbing the delicate balance of aquatic ecosystems and marine life; or restricting the recreational use of waterways. Our solutions also help mitigate the potential for the increased stormwater runoff flows from urbanised areas which can cause localised flooding and irreparable scouring to waterways.

Likewise, we develop treatment and storage processes that can assist communities ease the pressure on their potable water supplies by enabling stormwater to be harvested for irrigation and some internal applications.

Importantly, our approach recognises that managing the impacts of stormwater runoff close to source provides significant cost benefits over the inescapable alternative of remediating downstream damage at a later stage.

We provide support and education to a wide range of stakeholders, including local governments, regulators, planners, engineers and developers on how to best meet their stormwater quality and quantity requirements. Our extensive stormwater management expertise together with our understanding of the complex regulatory framework, enables us to develop systems that combine compliance with cost-efficiency. Similarly, this knowledge allows us to simplify the planning approval process by designing Best Management Practice solutions that achieve each project's functionality and sustainability objectives, and conform to Australia's most stringent standards and technical requirements.

Through a programme of continual investment in research and development, Stormwater360 strives to deliver not only new and innovative products, solutions and services, but also to encourage property development and the construction of affordable housing by increased yield, while at the same time protecting the Australian environment and reducing the potential for future remediation costs from adversely impacting the community.



## Core competencies and organisational achievements

Stormwater360 specialises in achieving the highest level of water quality through products that have been tested in Queensland by Queensland organisations. We continue to strive for new products that are more cost effective and easier for developers and councils to use in planning their projects.

Stormwater360 is one of the only manufacturers in Queensland that provides products that have been proven through reliable research and field validation to meet mandated water quality objectives. We work closely with developers to assist them create profitable developments that also protect the environment.

Stormwater360 is recognised as the industry leader in innovation, and has recently launched the Facilitates Management Plan (FMP). The FMP is the next generation of stormwater management and is the first programme of its kind anywhere in the world. It allows clients to amortise the capital cost of their stormwater management equipment over 10 years, which includes ongoing maintenance of the system. Through the FMP, developers and councils can have the latest in water quality equipment at no capital cost. This initiative encourages development and promotes affordable housing while also guaranteeing compliance with State Government guidelines.

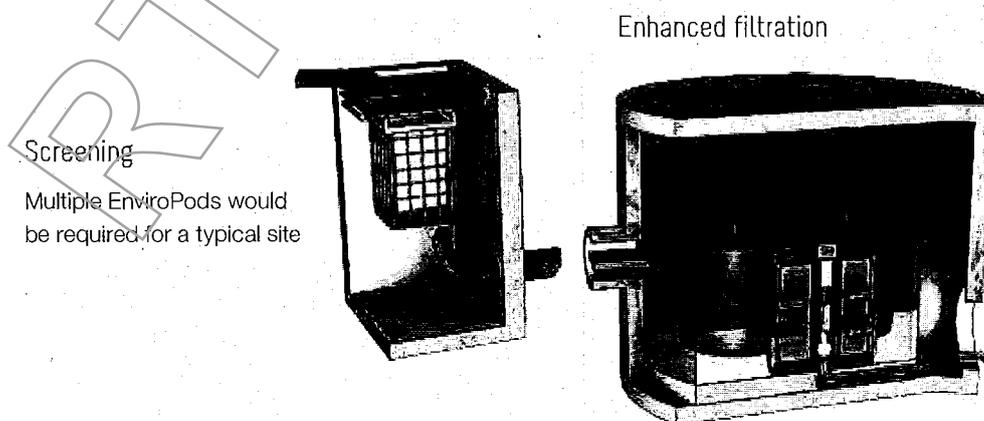
Stormwater360 embarked on a revolutionary field monitoring programme six years ago, combining the world-class technologies of our StormFilter and EnviroPod (SFEP) system. We were chosen by Queensland Main Roads and James Cook University as the first choice technology company to test these products in Queensland. The field monitoring was to prove that these "proprietary" systems could meet the most stringent water quality and quantity guidelines without limiting the use of developable land. The SFEP system was trialled over four years through extensive testing protocols and was proven to provide similar outcomes to traditional methods such as bio retention.

Developers now have the option to use this device throughout Queensland, enabling them to achieve regulatory compliance without losing valuable land in the process. Stormwater360 is currently the only company with an approved solution of this kind in Australia.

**The FMP assisted my business in reducing the capital cost of the development whilst still meeting council's water quality requirements, it was a win-win and I'll continue to use the FMP for future developments.**

Manos Saridakis – Private Developer Brisbane

Figure 1. The SFEP system.



## Product info – SFEP

Given that treatment standards focus on a broad spectrum of contaminants including debris, coarse and fine particulates, and soluble stormwater pollutants, a treatment train combining multiple devices is required to provide an effective solution. The figure 1 schematic illustrates the StormFilter EnviroPod (SFEP) treatment train of devices.

The EnviroPod Filter is a gully pit insert designed to be easily retrofitted into new and existing stormwater gully pits, requiring no construction and no land take. Located at the source of stormwater contaminants, the EnviroPod Filter can be customised to meet site-specific requirements with interchangeable polyester mesh screens ranging from 200 to 1600 micron pore size. The EnviroPod filter relies on removing contaminants from stormwater by the mechanism of direct screening, which guarantees debris and particles larger than the pore size will be removed.

The StormFilter operates at a much lower flow rate than the EnviroPod insert, which is necessary in order to achieve extremely high levels of removal efficiency of fine and soluble contaminants. The StormFilter technology is designed to remove both particulate bound and soluble pollutants, and is typically located near the outlet of the development. By utilising a combination of StormFilter and EnviroPod devices in a treatment train, along with other techniques, the stormwater pollutant reduction objectives of each site can be easily achieved.

## Client list

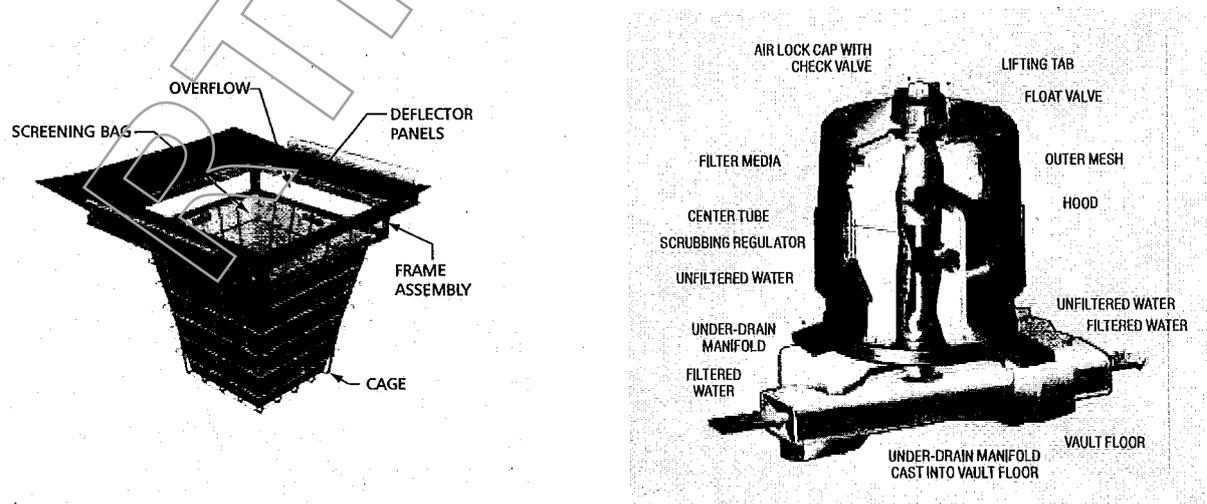
### Statutory organisations

Ipswich	Redland City Council
Brisbane City Council	Logan City Council
Gold Coast City Council	Mackay Regional Council
Sunshine Coast Regional Council	Moreton Bay Regional Council

### Development industry

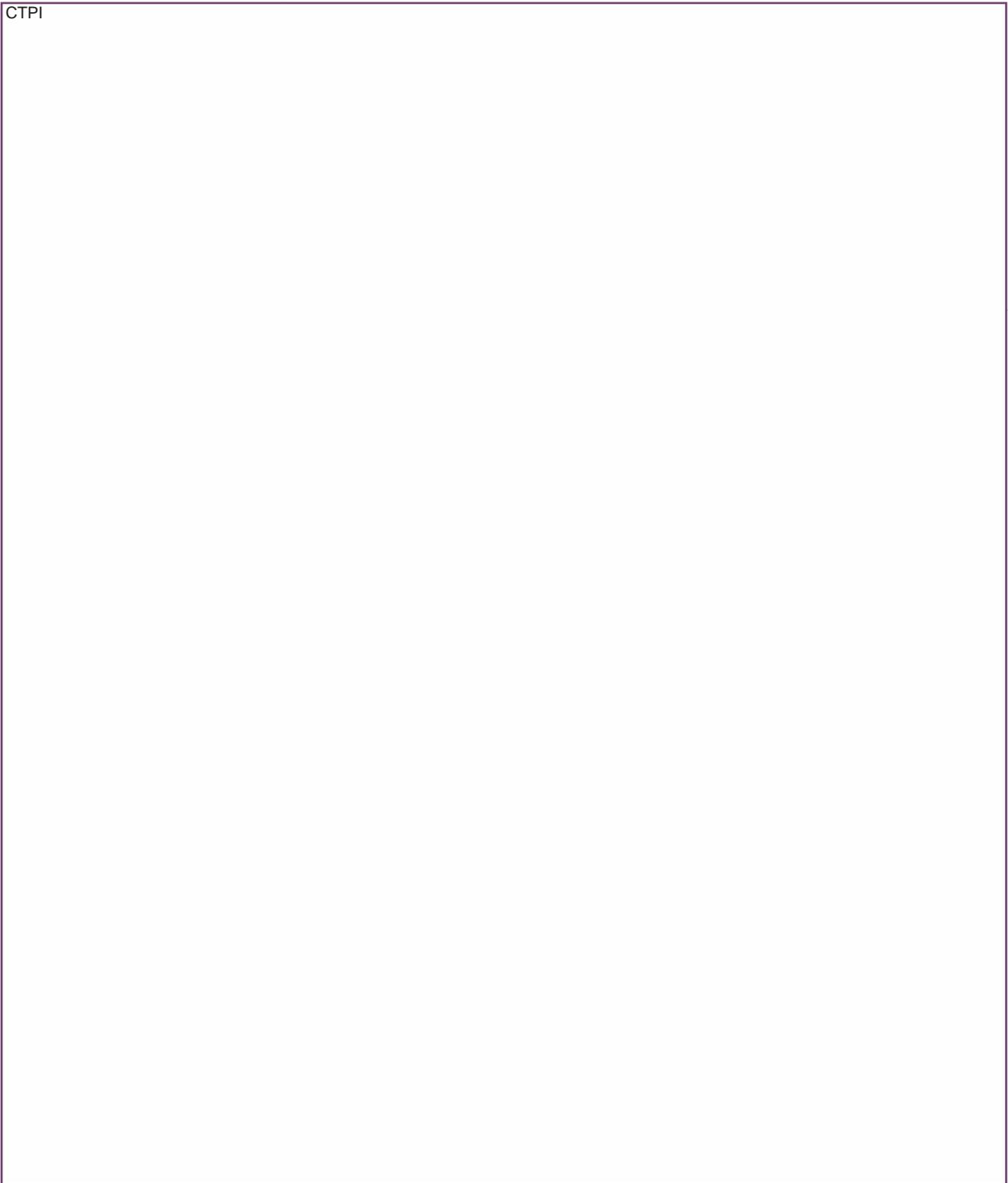
Australand	Woolworths
Goodman	Coles
Hutchison Builders	Caltex
Lend lease	Shell
Space Frame	BP
North build	Dan Murphy's
Pelicano	Hungry Jacks
Visy Recycling	KFC
McDonalds	Westfield
Bunnings	Harvey Norman
Masters	Translink

Figure 2. Individual components of the SFEP Treatment, EnviroPod and StormFilter cartridge respectively.



## Management profiles

CTPI



For more information  
or call 1300 354 722  
[www.stormwater360.com.au](http://www.stormwater360.com.au)



Begin forwarded message:

**From:** "Santo Santoro" <[santo@santosantoro.com](mailto:santo@santosantoro.com)>  
**Subject:** Request for meeting with The Hon Andrew Powell MP, Minister for Environment and Heritage Protection - Stormwater360  
**Date:** 15 October 2012 3:32:31 PM AEST  
**To:** "Andrew Powell MP" <[Environment@ministerial.qld.gov.au](mailto:Environment@ministerial.qld.gov.au)>  
**Cc:** "'Troy Collings'" <[Troy.Collings@ministerial.qld.gov.au](mailto:Troy.Collings@ministerial.qld.gov.au)>, <[mark@santosantoro.com](mailto:mark@santosantoro.com)>

Dear Minister

I would be grateful if you could find the time to meet with CTPI from Stormwater360, a client of Santoro Consulting registered on the Queensland Lobbyist Register.

CTPI is the Managing Director of Stormwater360, a storm water treatment, storage and maintenance company with a focus on delivering solutions which protect Australia's waterways, estuaries, coastline and marine life from the rising levels of harmful contaminants found in storm water runoff as well as the increasing flows from urbanised areas. As I am sure you know, these contaminants can cause irreparable pollution of our waterways and have a long term impact on biodiversity.

Underpinning our clients' business, is the technology to efficiently address the environmental, economic and financial cost of such pollution and the very significant advances that have been made in Water Sensitive Urban Design (WSUD). Over the last few years, state and local governments around Australia have sought to implement WSUD concepts and practices in new developments in an effort to stop adding to this problem and eventually reduce it. In 2011, the then Queensland Government implemented *State Planning Policy 4/10 Healthy Waters* (SPP4/10) as the centrepiece of planning regulation implementing WSUD principles. However, the implementation of SPP4/10 in its current form has attracted some criticism, chiefly that its adds to 'red/green tape', causing delays and additional cost.

As you would be aware, the Deputy Premier has been tasked with reviewing the *Sustainable Planning Act* to make it the most cost efficient, time effective planning framework in Australia. This review will and should impact on SPP4/10. WSUD is also under review by the Office of Best Practice Regulation (OBPR). At the direction of the Treasurer and Attorney-General, OBPR been asked to report to government on a framework for reducing the burden of regulation. Their issues paper, Measuring and Reducing the Burden of Regulation, specifically raises WSUD and the relevant planning legislation at section 9.3.2.

CTPI

Given this current policy debate and review and the competing interests of the

development and environmental protection, we would be very interested in discussing this matter with you to get your thoughts on what might be the best way to address any red tape concerns without compromising environmental outcomes. As such, we would be grateful if you could let me know the best person to contact in your office to make arrangements for a meeting or please ask them to give me a call.

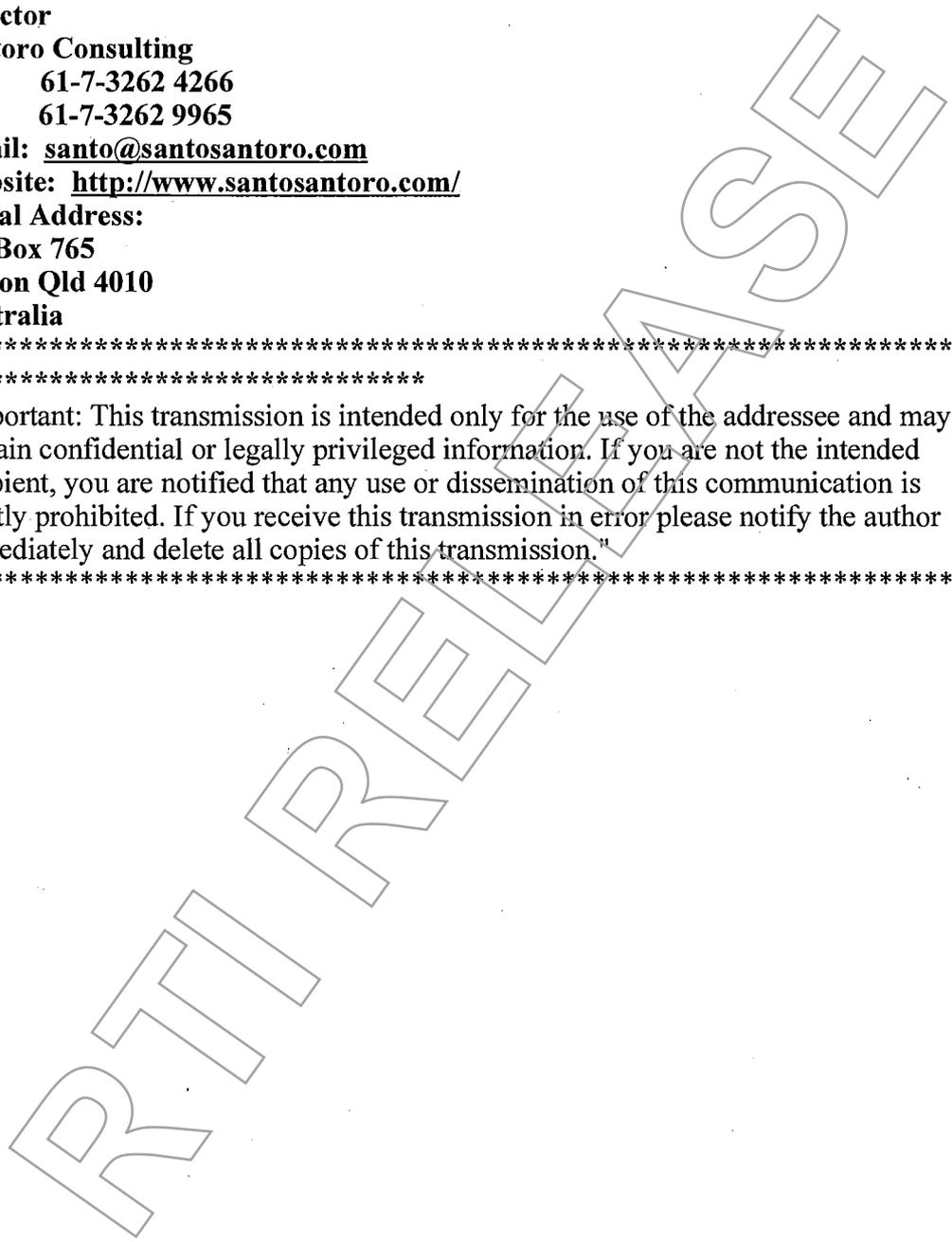
With sincere thanks in anticipation of your kind assistance,

**The Hon Santo Santoro**  
**Director**  
**Santoro Consulting**  
**Ph: 61-7-3262 4266**  
**Fax: 61-7-3262 9965**  
**Email: [santo@santosantoro.com](mailto:santo@santosantoro.com)**  
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**Postal Address:**  
**PO Box 765**  
**Albion Qld 4010**  
**Australia**

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**Daniel Smith**

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**From:** Mark Powell [mark@santosantoro.com]  
**Sent:** Tuesday, 11 December 2012 2:49 PM  
**To:** Adrian Jeffreys  
**Subject:** Re: Request for meeting with Executive Director, Environment and Resources Policy, Department of the Premier and Cabinet - Stormwater360  
**Attachments:** SW360 Single SPP Water Quality.pdf; ATT00001.htm; SW360 Company Profile.pdf; ATT00002.htm

Dear Adrian

Further to our telephone conversation yesterday, I would like to confirm our meeting on Tuesday 18th December 2012 at 2pm. Can you please confirm that will be on the 14th Floor of the Executive Building, 100 George Street, Brisbane?

Please let me know if you have any questions or would like any further information. Otherwise, CTPI and I look forward to seeing you on the 18th.

Kind regards

Mark Powell  
Partner  
Santoro Consulting

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# Planning reform

Single SPP - Water quality

Our waterways. Our future.

Stormwater360  
AUSTRALIA

## Executive summary

- > Stormwater360 Australia (100 % Australian owned) has worked in the Stormwater Management industry for over 10 years in Australia, New Zealand and North America. Stormwater 360 provides turnkey solutions to managing the effects of urban runoff and its associated pollutants.
- > Urbanisation increases stormwater runoff and the transport of pollutants into our waterways. This includes gross pollutants, sediment and nutrients which are proven to have a detrimental effect of downstream ecosystems.
- > Research shows that marine and waterway health are the most significant concern of residents of South-East Queensland in relation to population growth (TNS Social Research, 2010).
- > The current policy and regulatory framework encompassing Water Sensitive Urban Design (W.S.U.D) are essential to maintaining marine and waterway health, but have been identified by some as regulatory burden on development in Queensland. In Queensland, the key component of that framework is State Planning Policy 4/10 Healthy Waters (SPP 4/10)
- > Since the adoption of SPP 4/10, Queensland's regulatory framework provides the most streamlined approach to the implementation of the management of stormwater quality anywhere within Australia, leading to the shortest development approval timeframes.
- > The Newman Government is currently seeking to streamline the development approval process by amending a range of policies under the Sustainable Planning Act 2009, having indicated a desire to merge the current 12 State Planning Policies (SPP) into a single SPP document and simplified regulations to drive an efficient development approval process. Stormwater 360 fully supports this process, provided that environmental outcomes, especially as they relate to stormwater management, are maintained.

## Outcomes sought

1. The new single SPP must have the same scope and effect of SPP 4/10 as they relate to stormwater management and empower local government to ensure compliance by enabling them to enforce stormwater treatment standards for proposed developments. The minimum requirements that must be maintained to achieve this objective are:
  - > Ensure the scope of the policy applies to all developments greater than 2500m<sup>2</sup> or six or more additional dwellings.
  - > The implementation of the policy is achieved through a single state-wide Master SRP requirement, administered by local government through the development application approval process.
  - > Ensure that water quality objectives as referenced in the current Urban Stormwater Quality Planning Guidelines 2010 are adhered to.
  - > Any innovative technology is assessed in accordance with the Water by Design MUSIC modelling guidelines document.
2. That the overall system maintain a mandatory, user-pays, site specific stormwater treatment requirement.
3. Expansion of 'deemed to comply' solutions to include a new technology certification program that enables innovative technologies to be included in this process. The technology certification program could be based upon an amended version of the Water by Design MUSIC modelling guidelines document.

The effects of urbanisation negatively impact aquatic ecosystems by increasing both stormwater pollutant loads and stormwater flow. Pollution loads increase proportionally with the degree of urbanisation in the catchment area. Stormwater pollutants can take several forms such as gross pollutants or litter, which can be easily visualised to fine suspended solids, or nutrients, which cannot be seen as they can be soluble in solution.

Regardless of the pollutant, in high concentrations or quantities they can all have a profound detrimental effect on both the flora and fauna within, or reliant on, the receiving waterways. In order to manage these effects, sustainable urban water management is implemented through a process called Water Sensitive Urban Design (WSUD). WSUD (see Figure 1) is a land planning and engineering design approach, that integrates the urban water cycle, including stormwater, groundwater and wastewater management, and water supply, into urban design to minimise environmental degradation and improve aesthetic and recreational appeal.

In 2001, the South East Queensland Healthy Waterways Partnership (SEQHWP) was established to provide independent advice and collaboration between government, industry, research organisations and community. The partnership works to improve the water quality of South-East Queensland and in particular Moreton Bay by significantly reducing not only sediment, but more importantly, nitrogen load into Moreton Bay. In 2005 the SEQHWP established the Water by Design program to provide capacity building for both the urban development and water sector to support the uptake of WSUD.

Federal, state and local government regulators in Australia, and around the world, have identified the need to regulate stormwater pollution. For example:

- NSW Environmental Protection Authority (EPA, 1997)
- VIC Environmental Protection Authority (BPEMG, 1999)
- QLD Department of Environment and Resource Management (DERM, 2009)
- USA Environmental Protection Authority (Clean Water Act 1986)

In 2009, the then Queensland Government recognised the need for greater governance of stormwater pollution, leading to the Draft State Planning Policy for Healthy Waters, designed to be a core part of a range of initiatives and regulations designed to address these issues. The framework of this plan is shown in Figure 2.

Figure 1: The water balance, urbanisation and WSUD (Source: National Water Commission)

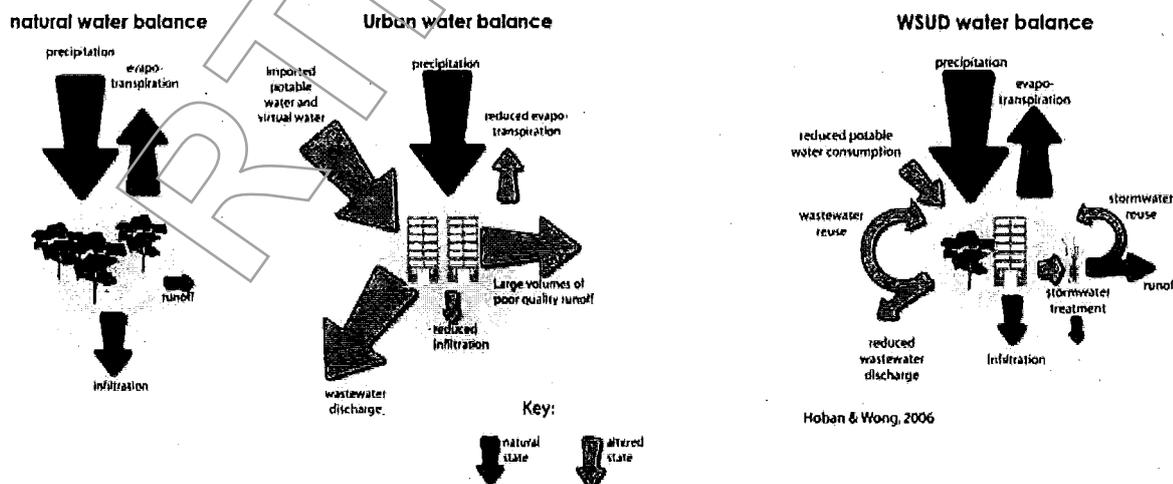
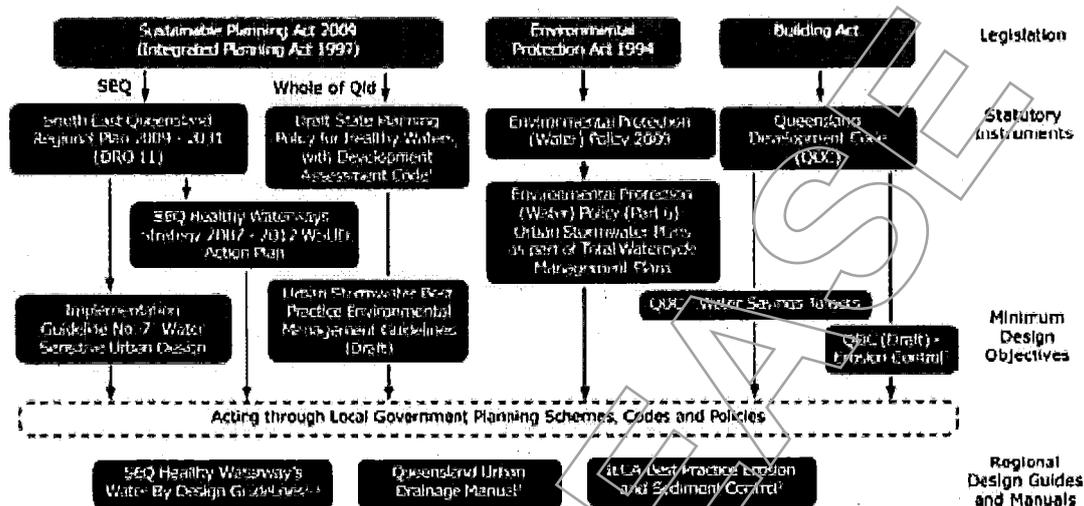


Figure 2: WSUD Management Policy & Regulation Ecosystem (Source: South East Queensland Regional Plan 2009–2031)



These guidelines incorporate nationally (generally) agreed water quality objectives together with succinct selection criteria to simply determine the applicability of these standards to any development. No other jurisdiction in Australia has a single unified set of design guidelines and objectives. For example, Sydney has 42 local government entities with varying degrees of design objectives and degrees of regulation in their planning schemes. Queensland therefore leads the way in providing clarity and transparency of a single set of requirements in this regard, speeding up the assessment process.

State Planning Policy 4/10 Healthy Waters came into effect in 2011. The policy set minimum requirements and criteria to be established within each local government's development planning schemes. If a planning scheme for urban stormwater management was not in existence at local government, then SPP4/10 would form the basis of the planning scheme with respect to stormwater until such time one was developed by the local government authority.

**Issues description**

Following the election of the Newman Government and the implementation of the Six Month Action Plan, the government sought to grow a Four Pillar Economy through focusing on tourism, agriculture, resources and construction and by cutting red tape and regulation. This included the appointment of The Hon Ian Walker MP as Assistant Minister for Planning Reform, tasked with working:

*with the Deputy Premier in a leadership role to review the Sustainable Planning Act to make it the most cost efficient, time effective planning framework in Australia. In addition, I expect that you will take a role in assisting the Deputy Premier's work in encouraging the growth of the property and construction industry. (Assistant Minister's Charter Letter)*



An example of eutrophication which results from stormwater pollution

As a result of these and related commitments, there have been significant reforms to sustainable planning regulations and processes foreshadowed.

Stormwater360 has worked in the WSUD space for over 10 years throughout the eastern states of Australia as well as New Zealand. Since the adoption SPP 4/10, the Queensland system provides the most streamlined approach to the implementation of WSUD anywhere within Australia, leading to the shortest development approval periods. The clear, standard approach provided by SPP 4/10 provides councils with the certainty to determine development applications quickly and consistently. Therefore, we feel confident that this regulation provides significant environmental benefit without being 'green tape'.

*"The State Planning Policy for Healthy Waters 4/10 (SPP HW) is a key policy for ensuring stormwater on development sites is managed to protect waterway health. With significant future development planned in Queensland, the policy is essential for protecting the environmental, social and economic values of our waterways, which are intrinsically linked."*

*Nicole Ramlio – President  
Stormwater Industry Association Queensland*

However, issues in the operation and measurement of WSUD standards have been identified by both local government and consulting engineers. That is, it is not the approval process and implementation of WSUD that is at issue, but the management of stormwater quantity and flows. SPP 4/10 establishes clear criteria and objectives and a unified set of common tools to implement WSUD, however, the management of quantity involves a range of different software programs with varying methods in determining stormwater attenuation volumes to mitigate flooding. One council recently stated:

*if you look into the problem, water quality management is straight forward and rarely causes any issues... water quantity management is where the assessment timeframe can be severely affected... (Local Government Manager, South East QLD Council)*

That said, stormwater quality management and the implementation of WSUD are not entirely without issue. Professional developers generally understand the social and economic benefits WSUD can provide and therefore plan for and comply with WSUD requirements, integrating them into their planning and processes at the outset.

However, other developers neglect to plan and integrate WSUD within the initial stages of their development, giving rise to unplanned cost issues, physical constraints from attempting to retrofit a WSUD compliant system, ultimately leading to a loss of yield and complaints about 'green tape'. On larger developments some stakeholders cite the bureaucratic inefficiency of multiple state government bodies being involved, providing subjective and conflicting guidelines. Issues have also been identified within integration of all the services within local governments such as roads, drainage and parklands.

Other factors/issues have been identified that could potentially pose minor cost impacts on developments by implementing WSUD. These include, increased minor maintenance tasks for residents and the environmental costs associated with sourcing the materials for WSUD treatment measures.

#### Consequences and costs of change

Fundamentally, contaminants are produced and spilled, and they will enter the stormwater system. They must be dealt with by those producing them at source, typically a process regulated by local government, or ultimately will not be treated, in which case they will flow into the catchments and waterways, impacting the environment. Changing or reducing the effectiveness of SPP 4/10 would have an inevitable and unavoidable impact on the environment in a way that directly impacts the lives of Queenslanders, in their local creeks and rivers, in Moreton Bay and on the Great Barrier Reef. Research shows that marine and waterway health are the most significant concern of residents of South-East Queensland in relation to population growth (TNS Social Research, 2010). In compiling a single SPP the core values of SPP 4/10 such as scope, compliance, water quality standards and methods of assessment must be upheld. Any degradation of the policy will also have a negative impact on the environment and ultimately Tourism industry, a central component of the Newman Government's Four-Pillar Economy.

In the most recently available Report Card, produced by Healthy Waterways, the Lower Brisbane Catchment (covering the central Brisbane area) ecosystem health was assessed against water quality guidelines, as an "D+", corresponding to "Poor: Conditions meet few set ecosystem health values. Most key processes are not

functional and many critical habitats are impacted." The result is the first improvement in the last 5 years of monitoring, and arguable coincides with the introduction of SPP 4/10.

While many factors are linked to overall waterway ecosystem health, stormwater contaminants being one of many, the majority of Queensland's population, and therefore our recreation and tourism activities, are located on the coast and revolve around the rivers, creeks, beaches, the ocean and the Great Barrier Reef. Excess sediment loads attribute to coral bleaching and ultimately degradation of this major tourism asset. Excessive nitrogen loads lead to algal blooms that are toxic to aquatic plants and the mortality of animals. These blooms also effect transparency of water, produce an undesirable odour and can ultimately impact the perceived value of the bodies of water body where the majority the Queensland tourism activities are located.

*"A decline in the health and amenity of our waterways from poor stormwater management also poses significant social and economic risk implications. The annual economic value of Moreton Bay is estimated to be \$5.11 billion dollars, with tourism and recreation alone earning \$3.5 billion each year, and primary industries worth \$1.39 billion (QCC, 2011). It is therefore essential that future development be sustainably managed to protect waterway health and related economic and recreational values. The SPP HW provides a key mechanism for ensuring that this is achieved, hence it is vital that its requirements are maintained in the drafting of a new single State Planning Policy."*

*Nicole Ramlio – President  
Stormwater Industry Association Queensland*



Example of localised flooding

Many other tangible benefits arise from the proper implementation of WSUD. These include protecting the quality of ground water, avoiding the costs of rehabilitating downstream infrastructure, protection of fish stocks impacting recreational and commercial fishing, reduction of heat island effect and associated increased energy costs for cooling and the protection of social amenity.

Reducing the regulatory burden by 20% is expected to provide an improvement to the development sector in QLD. This strategy can positively and negatively impede different aspects of the Four Pillar Economy. The impacts arising from this increased development will provide substantial benefit to the building sector and ultimately the economy in Queensland. The unfortunate reality of increasing development is that it will provide more pressure on our waterway health and ultimately tourism. In managing these effects it could be possible to shift the problem to other parties or asset owners. For example, the local and state government organisations are custodians of our receiving waterways, and hence providing end-of-line/pipe style solutions may be possible, however there would be a significant cost shift from the land owner to government and moves away from a user pays system. This would also discourage land owners to try and reduce pollutant generated from their sites as there is no direct financial incentive to do so. This problem is compounded by the fact that high pollution yields are generated from sites such as Commercial and Industrial developments with residential subdivisions shown to generate lower pollutant loads over the long term.

In the case of providing WSUD for developments there is an argument that regulation actually assists the development approval timeframe and underlying costs. For example, in Sydney there is no unified strategy that is enforced across the Sydney metropolitan region. The 42 local government organisations individually manage the development assessment process in their own areas. Unfortunately, whilst the ultimate goal of protecting our waterway health is in relative agreement, the standards, treatment goals, methods of demonstrating compliance whilst are all similar may not be consistent. A recent seminar held by the NSW Stormwater Industry Association was titled "Getting WSUD through the development process in 60 days". Whilst it was thought that 60 days would be a significant achievement it highlighted the cumbersome nature of the process in NSW. Compare this for QLD where on low risk sites the process can take as little as 10 days for deemed-to-comply type solutions.

Implementation of WSUD that provides integration into the development at the local scale is desirable by urban developers and provides the best outcomes. Most of the costs and issues arise when WSUD is poorly integrated into development, commonly leading to an "end-of-line" or regional WSUD type solution. The disadvantages of this practice are that centralised regional end-of-line solutions must be located at the lowest downstream point. Consequently, they can be difficult to site, spatially inefficient, require extra earthworks by constructing large berms, increase proportional sizes due to maintenance access requirements, which all lead to reduced development yield. These assets, whilst initially being maintained and controlled by the development become the responsibility of local government over time for the long term. In most cases, developers adequately maintain these systems, as there is a direct tangible decrease in their property development values should they fail to do so.

### Outcomes sought

We propose the following outcomes that may reduce development approval timeframes, whilst protecting downstream waterway health. These are:

1. The new single SPP must have the same scope and effect of SPP 4/10 as they relate to stormwater management and empower local government to ensure compliance by enabling them to enforce stormwater treatment standards for proposed development. The minimum requirements that must be maintained to achieve this objective are:
  - > Ensure the scope of the policy applies to all developments greater than 2500m<sup>2</sup> or six or more additional dwellings.
  - > The implementation of the policy is achieved through a single state-wide Master SPP requirement, administered by local government through the development application approval process.
  - > Ensure that water quality objectives as referenced in the current Urban Stormwater Quality Planning Guidelines 2010 are adhered to.
  - > Any innovative technology is assessed in accordance with the Water by Design MUSIC modelling guidelines document.

2. That the overall system maintain a mandatory, user-pays, site specific stormwater treatment requirement.
3. Expansion of deemed to comply solutions to include a new technology certification program that enables innovative technologies to be included in this process. The technology certification program could be based upon an amended version of the Water by Design MUSIC modelling guidelines document.

The SPP 4/10 policy has now been in effect for over 18 months, and from the latest Healthy waterways report card, it is the first time in 5 years there has been an improvement in the lower Brisbane catchment waterway health, a direct tangible benefit to the environment. Many stakeholders agree that the process under this framework is concise, especially for an approach such as WSUD that is a design methodology or planning tool which is not the implementation of one particular product or practice.

Local government development assessment compliance for WSUD can be provided in one of two ways. Firstly, by following the deemed to comply solutions for vegetated systems, which offer pre-sized and approved non-proprietary treatment options. These options facilitate a speedier development approval process, but can have limited scope and are more suitable for low risk, small development sites and can be in some situations costly. The second method of compliance is achieved via the universally accepted modelling software MUSIC. Regrettably, the current lack of regulation on stormwater device evaluation has left a large scope for manufacturers to make misleading claims about device performance. Such claims not only translate to a viable risk to the environmental safety of our waterways, but also to the design engineer's time and cost which are directly passed to the development. An approach where innovative technologies meet a selection criteria and then have scope to be implemented as an expanded part of the deemed to comply solutions would be beneficial for the assessment process. This would not only provide direct benefit to developments using the deemed to comply route, it would also free up development assessment resources for developments that detailed modelling and indirectly facilitate the reduction of assessment time for this area additionally.

## Conclusion

For the last 10 years or so WSUD has continued to evolve. The unfortunate reality is that many of the policies and codes have been developed over the same time period. As the science continues to develop, the planning schemes and guidelines within local government are either out of date or contradict other guidelines. There appears to be limited cross-pollination of policies. For example WSUD is seldom referred to within council's roadway policies yet some of the stormwater quality improvement devices are located in, or on, roadway easements. A single SPP, including the core values of SPP4/10 ensuring waterway health, helps to clarify this situation, however, the scope would benefit to being expanded to cover issues like these in all local planning schemes.

Unquestionably, the interests and core values underpinning SPP 4/10 provides protection of receiving waterways and ecosystem health. The policy provides a unified set of water quality standards across the entire state thereby ensuring a simple and easy framework to follow for all stakeholders. The Healthy Waterways report card indicates an improvement of environmental values have been achieved and the policy provides a suitable moral balance between the environment, development and the tourism industry.

Finally, Stormwater 360 are in agreement with the Queensland government's plan to encourage development in Queensland as commercially it would be advantageous for the economy and all stakeholders concerned. Careful consideration needs to be undertaken to ensure that any increased development and associated environmental effects are managed effectively to guarantee the health of Queensland waterways to the benefit of all Queenslanders and tourist alike.

## References

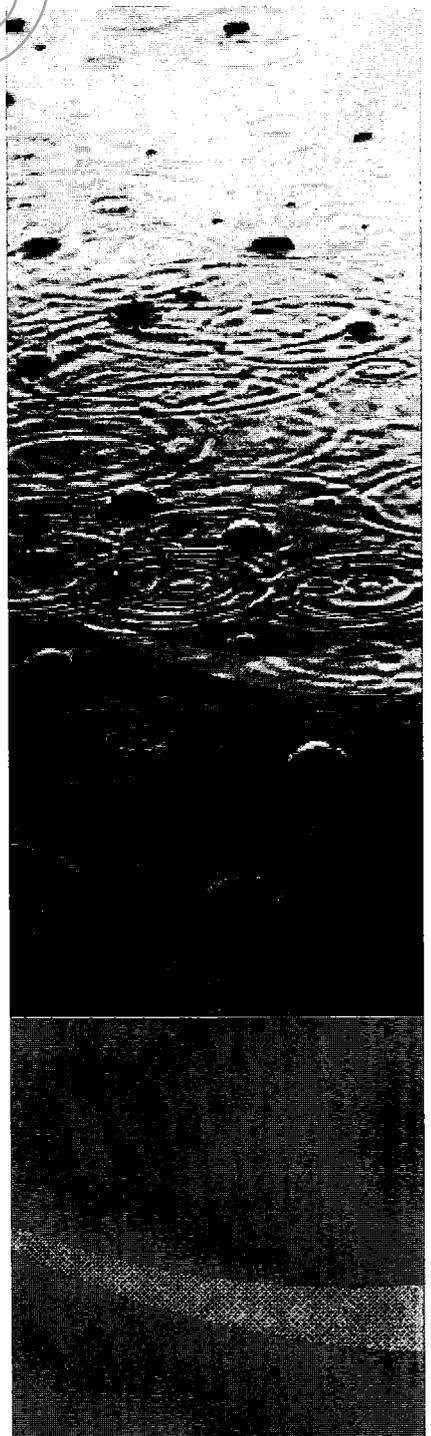
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- Water by Design, 2010: A Business Case for Best Practice Urban Stormwater Management Version 1.1 – September 2010.
- Bligh Tanner, 2012: Measuring and Reducing the Burden of Regulation – Submission on the Issues Paper Healthy Waterways: 2012 Report Card Results, <http://www.health-e-waterways.org>

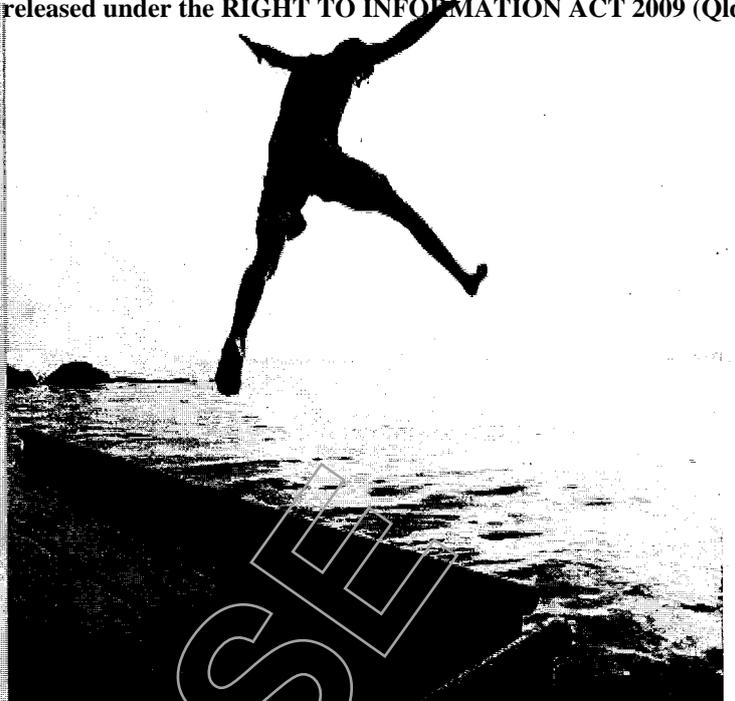
Stormwater360 supplies and maintains a complete range of filtration, hydrodynamic separation, screening and oil/water separation technologies.

Call 1300 354 722

[www.stormwater360.com.au](http://www.stormwater360.com.au)

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Established in Australia in 2001, and with a presence in New Zealand since 1995, Stormwater360 is recognised as a leader in the design, development, implementation and ongoing maintenance of highly effective stormwater management systems.

While stormwater management has traditionally focused on flood control, our comprehensive approach to this discipline recognises stormwater as a resource that has importance from a social, environmental and economic perspective.

To maximise the value of this resource, our teams based in Sydney, Brisbane and (shortly) Melbourne, bring together the expertise and experience of specialists in engineering, land management, water management and environmental science. We utilise advanced modelling technologies to design Best Management Practice (BMP) solutions, and supply world-class field-tested products that have been proven for their efficacy in pollutant removal, filtration, harvesting and detention.

Stormwater360 develops systems and solutions that remove toxic contaminants in stormwater runoff from: entering the groundwater disturbing the delicate balance of aquatic ecosystems and marine life; or restricting the recreational use of waterways. Our solutions also help mitigate the potential for the increased stormwater runoff flows from urbanised areas which can cause localised flooding and irreparable scouring to waterways.

Likewise, we develop treatment and storage processes that can assist communities ease the pressure on their potable water supplies by enabling stormwater to be harvested for irrigation and some internal applications.

Importantly, our approach recognises that managing the impacts of stormwater runoff close to source provides significant cost benefits over the inescapable alternative of remediating downstream damage at a later stage.

We provide support and education to a wide range of stakeholders, including local governments, regulators, planners, engineers and developers on how to best meet their stormwater quality and quantity requirements. Our extensive stormwater management expertise together with our understanding of the complex regulatory framework, enables us to develop systems that combine compliance with cost-efficiency. Similarly, this knowledge allows us to simplify the planning approval process by designing Best Management Practice solutions that achieve each project's functionality and sustainability objectives, and conform to Australia's most stringent standards and technical requirements.

Through a programme of continual investment in research and development, Stormwater360 strives to deliver not only new and innovative products, solutions and services, but also to encourage property development and the construction of affordable housing by increased yield, while at the same time protecting the Australian environment and reducing the potential for future remediation costs from adversely impacting the community.

Our waterways. Our future.

Stormwater360  
AUSTRALIA

## Core competencies and organisational achievements

Stormwater360 specialises in achieving the highest level of water quality through products that have been tested in Queensland by Queensland organisations. We continue to strive for new products that are more cost effective and easier for developers and councils to use in planning their projects.

Stormwater360 is one of the only manufacturers in Queensland that provides products that have been proven through reliable research and field validation to meet mandated water quality objectives. We work closely with developers to assist them create profitable developments that also protect the environment.

Stormwater360 is recognised as the industry leader in innovation, and has recently launched the Facilitates Management Plan (FMP). The FMP is the next generation of stormwater management and is the first programme of its kind anywhere in the world. It allows clients to amortise the capital cost of their stormwater management equipment over 10 years, which includes ongoing maintenance of the system. Through the FMP, developers and councils can have the latest in water quality equipment at no capital cost. This initiative encourages development and promotes affordable housing while also guaranteeing compliance with State Government guidelines.

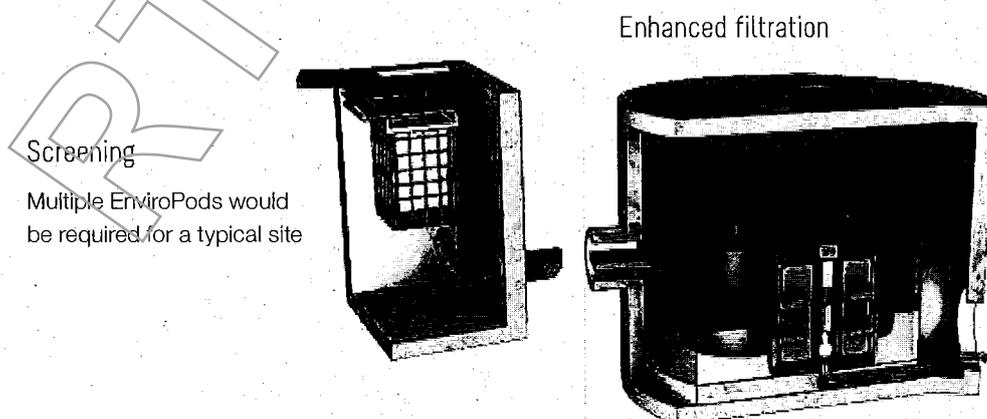
Stormwater360 embarked on a revolutionary field monitoring programme six years ago, combining the world-class technologies of our StormFilter and EnviroPod (SFEP) system. We were chosen by Queensland Main Roads and James Cook University as the first choice technology company to test these products in Queensland. The field monitoring was to prove that these "proprietary" systems could meet the most stringent water quality and quantity guidelines without limiting the use of developable land. The SFEP system was trialled over four years through extensive testing protocols and was proven to provide similar outcomes to traditional methods such as bio retention.

Developers now have the option to use this device throughout Queensland, enabling them to achieve regulatory compliance without losing valuable land in the process. Stormwater360 is currently the only company with an approved solution of this kind in Australia.

**The FMP assisted my business in reducing the capital cost of the development whilst still meeting council's water quality requirements, it was a win-win and I'll continue to use the FMP for future developments.**

Manos Saridakis - Private Developer Brisbane

Figure 1. The SFEP system.



## Product info – SFEP

Given that treatment standards focus on a broad spectrum of contaminants including debris, coarse and fine particulates, and soluble stormwater pollutants, a treatment train combining multiple devices is required to provide an effective solution. The figure 1 schematic illustrates the StormFilter EnviroPod (SFEP) treatment train of devices.

The EnviroPod Filter is a gully pit insert designed to be easily retrofitted into new and existing stormwater gully pits, requiring no construction and no land take. Located at the source of stormwater contaminants, the EnviroPod Filter can be customised to meet site-specific requirements with interchangeable polyester mesh screens ranging from 200 to 1600 micron pore size. The EnviroPod filter relies on removing contaminants from stormwater by the mechanism of direct screening, which guarantees debris and particles larger than the pore size will be removed.

The StormFilter operates at a much lower flow rate than the EnviroPod insert, which is necessary in order to achieve extremely high levels of removal efficiency of fine and soluble contaminants. The StormFilter technology is designed to remove both particulate bound and soluble pollutants, and is typically located near the outlet of the development. By utilising a combination of StormFilter and EnviroPod devices in a treatment train, along with other techniques, the stormwater pollutant reduction objectives of each site can be easily achieved.

## Client list

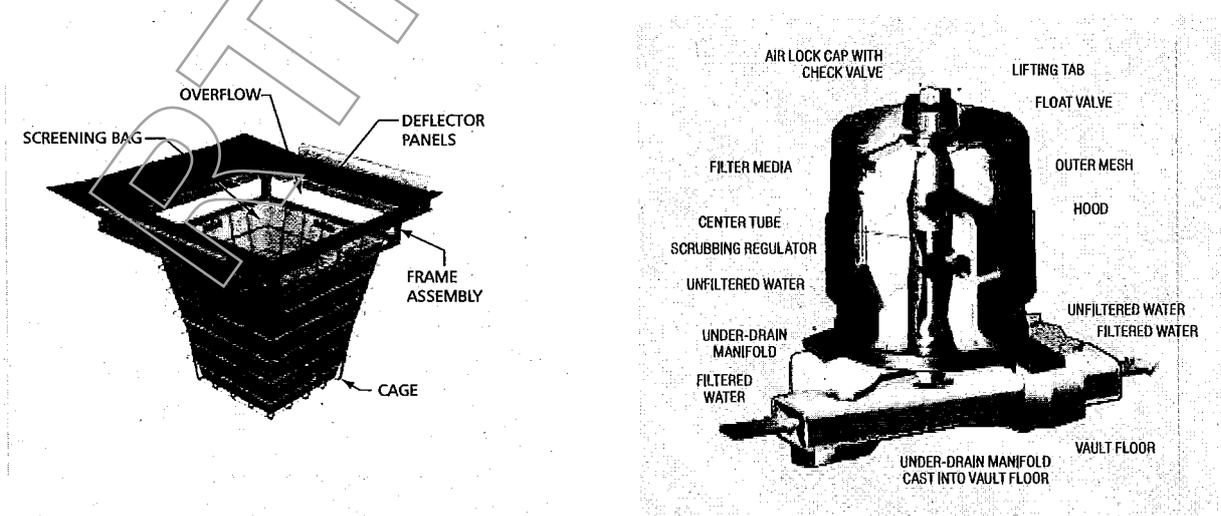
### Statutory organisations

Ipswich	Redland City Council
Brisbane City Council	Logan City Council
Gold Coast City Council	Mackay Regional Council
Sunshine Coast Regional Council	Moreton Bay Regional Council

### Development industry

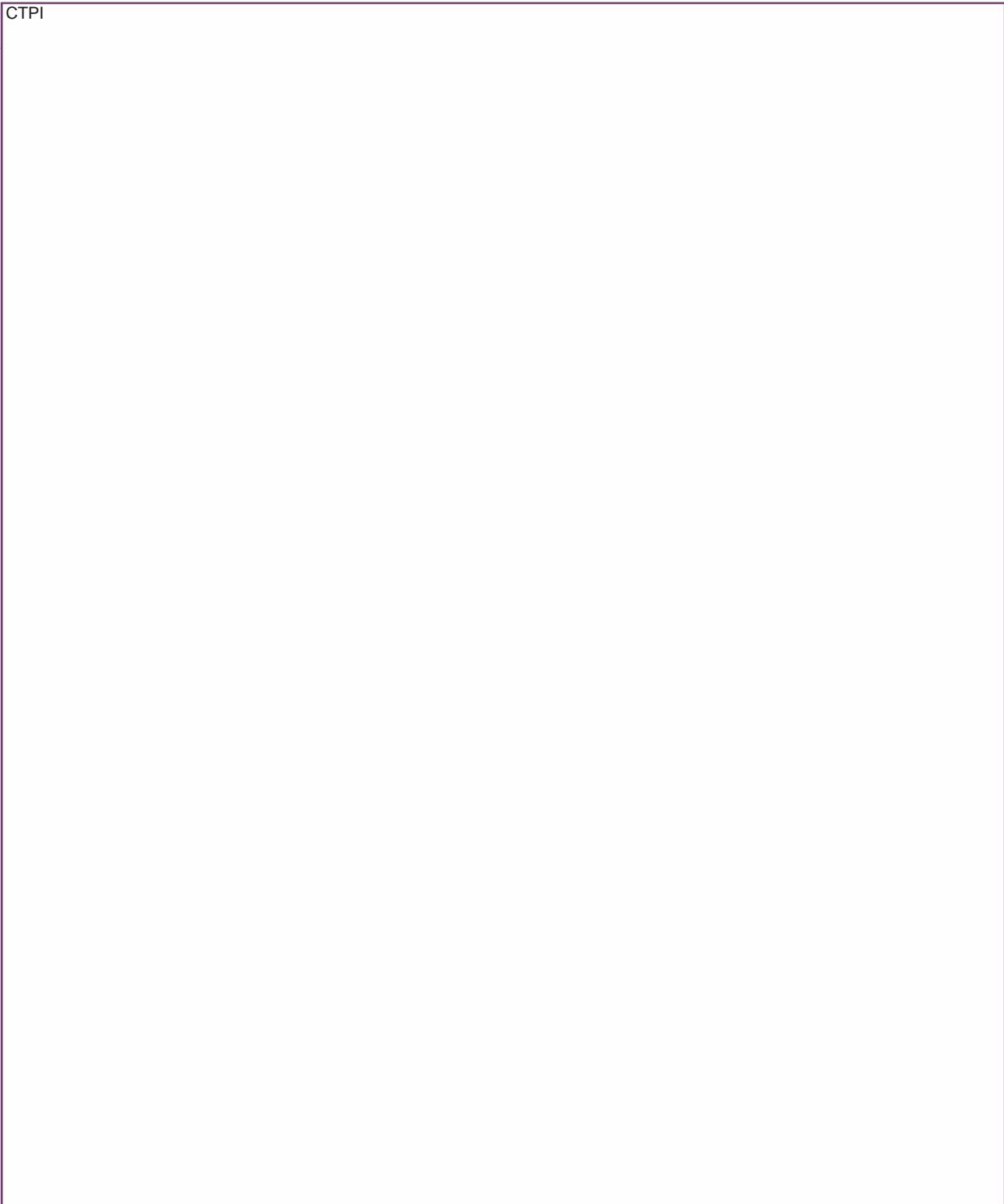
Australand	Woolworths
Goodman	Coles
Hutchison Builders	Caltex
Lend lease	Shell
Space Frame	BP
North build	Dan Murphy's
Pelicano	Hungry Jacks
Visy Recycling	KFC
McDonalds	Westfield
Bunnings	Harvey Norman
Masters	Translink

Figure 2. Individual components of the SFEP Treatment, EnviroPod and StormFilter cartridge respectively.



## Management profiles

CTPI



For more information  
or call 1300 354 722  
[www.stormwater360.com.au](http://www.stormwater360.com.au)



On 03/12/2012, at 8:32 AM, Mark Powell <mark@santosantoro.com> wrote:

Dear Mr Jeffreys

I would like to arrange a meeting between you and [CTPI] [CTPI] from Stormwater360, a client of Santoro Consulting registered on the Queensland Lobbyist Register.

[CTPI] met with Minister Powell and his Chief of Staff, Mr Troy Collings last week in relation to current reforms being considered to water sensitive urban design regulations and in particular, the work on planning reform being undertaken by Assistant Minister Walker. Some additional information on this matter is contained below in our original email to the Minister, as well as in the attached briefing note prepared for that meeting.

During our discussion with Minister Powell, he mentioned that we should also brief the relevant people in your Department in relation to the work on Great Barrier Reef. I spoke to Mr Collings this morning and he referred me to you and gave me your contact details.

Ahead of any potential meeting, I thought it might be best for us to discuss this matter briefly on the phone. Can you please advise a convenient time, or otherwise give me a call?

Kind regards

Mark Powell  
Partner  
Santoro Consulting

M: +61 [CTPI]  
P: +61 7 3262 4266  
F: +61 7 3262 9965  
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<SW360 Company Profile.pdf>

Begin forwarded message:

**From:** "Santo Santoro" <santo@santosantoro.com>  
**Subject:** Request for meeting with The Hon Andrew Powell MP,  
Minister for Environment and Heritage Protection - Stormwater360  
**Date:** 15 October 2012 3:32:31 PM AEST  
**To:** "Andrew Powell MP" <Environment@ministerial.qld.gov.au>  
**Cc:** "Troy Collings" <Troy.Collings@ministerial.qld.gov.au>,  
<mark@santosantoro.com>

Dear Minister

I would be grateful if you could find the time to meet with [CTPI] [CTPI] from Stormwater360, a client of Santoro Consulting registered on the Queensland Lobbyist Register.

[CTPI] is the Managing Director of Stormwater360, a storm water treatment, storage and maintenance company with a focus on delivering solutions which protect Australia's waterways, estuaries, coastline and marine life from the rising levels of harmful contaminants found in storm water runoff as well as the increasing flows from urbanised areas. As I am sure you know, these contaminants can cause irreparable pollution of our waterways and have a long term impact on biodiversity.

Underpinning our clients' business, is the technology to efficiently address the environmental, economic and financial cost of such pollution and the very significant advances that have been made in Water Sensitive Urban Design (WSUD). Over the last few years, state and local governments around Australia have sought to implement WSUD concepts and practices in new developments in an effort to stop adding to this problem and eventually reduce it. In 2011, the then Queensland Government implemented *State Planning Policy 4/10 Healthy Waters* (SPP4/10) as the centrepiece of planning regulation implementing WSUD principles. However, the implementation of SPP4/10 in its current form has attracted some criticism, chiefly that its adds to 'red/green tape', causing delays and additional cost.

As you would be aware, the Deputy Premier has been tasked with reviewing the *Sustainable Planning Act* to make it the most cost efficient, time effective planning framework in Australia. This review will and should impact on SPP4/10. WSUD is also under review by the Office of Best Practice Regulation (OBPR). At the direction of the Treasurer and Attorney-General, OBPR been asked to report to government on a framework for reducing the burden of regulation. Their issues paper, Measuring and Reducing the Burden of Regulation, specifically raises WSUD and the relevant planning legislation at section 9.3.2.

[CTPI]

CTPI

Given this current policy debate and review and the competing interests of the development and environmental protection, we would be very interested in discussing this matter with you to get your thoughts on what might be the best way to address any red tape concerns without compromising environmental outcomes. As such, we would be grateful if you could let me know the best person to contact in your office to make arrangements for a meeting or please ask them to give me a call.

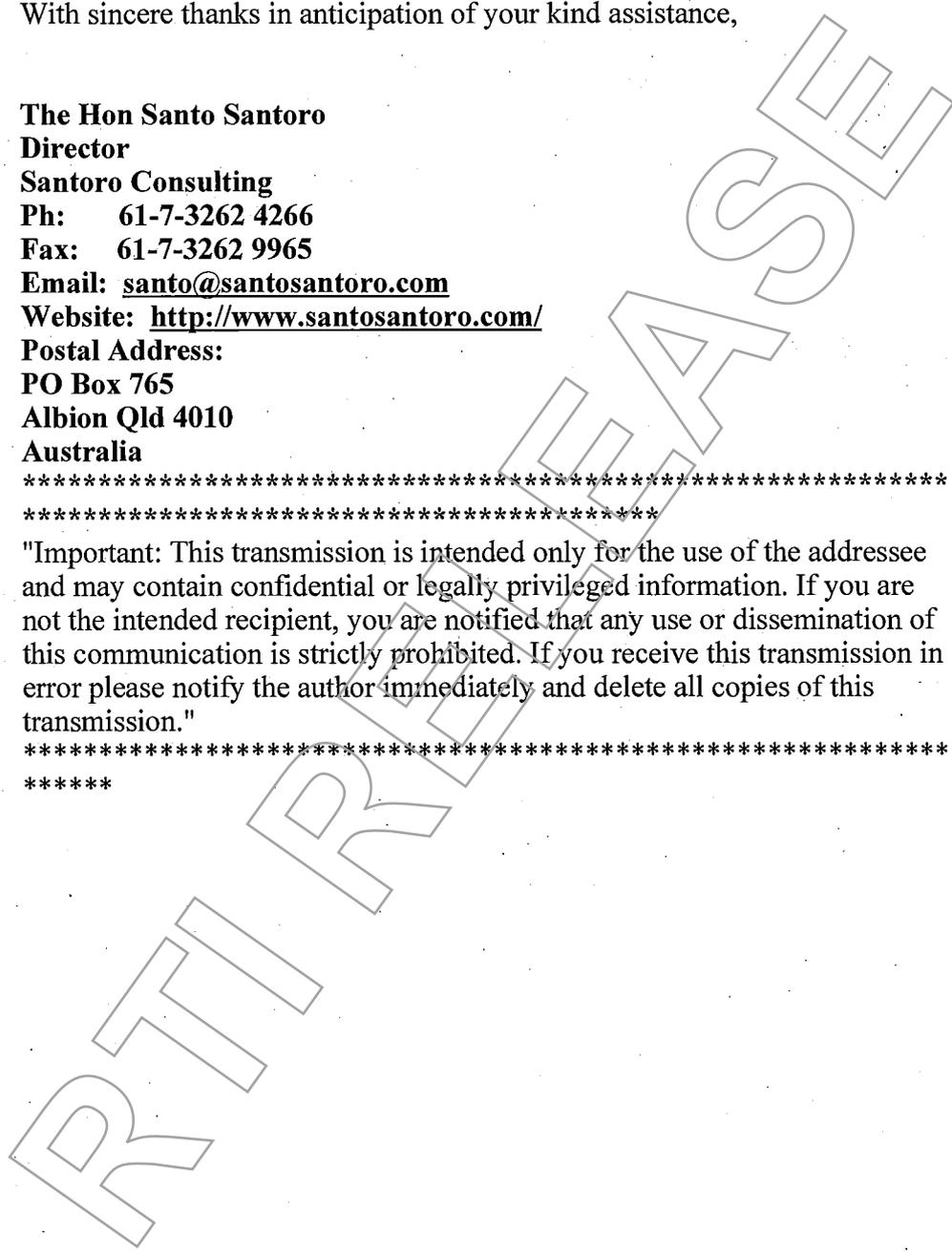
With sincere thanks in anticipation of your kind assistance,

**The Hon Santo Santoro**  
**Director**  
**Santoro Consulting**  
**Ph: 61-7-3262 4266**  
**Fax: 61-7-3262 9965**  
**Email: [santo@santosantoro.com](mailto:santo@santosantoro.com)**  
**Website: <http://www.santosantoro.com/>**  
**Postal Address:**  
**PO Box 765**  
**Albion Qld 4010**  
**Australia**

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**Daniel Smith**

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**From:** Google Calendar [calendar-notification@google.com] on behalf of Mark Powell [mark@santosantoro.com]  
**Sent:** Wednesday, 12 December 2012 9:31 AM  
**To:** Adrian Jeffreys  
**Subject:** Accepted: Meeting between Adrian Jeffreys and Mark Powell @ Tue 18 Dec 14:00 - 15:00 (Adrian Jeffreys)

please advise availability.

Dana Wilmington  
Environment and Resources Policy  
Qld Dept. of the Premier and Cabinet  
Ph: 07 322 58050  
E: [admin.erp@premiers.qld.gov.au](mailto:admin.erp@premiers.qld.gov.au)

*When*

Tue 18 Dec 14:00 – 15:00 Eastern Time - Brisbane

*Where*

Level 14, 100 George Street (Executive Building) ([map](#))

*Calendar*

Adrian Jeffreys

*Who*

Adrian J  
Mark Po

Invitation from Google Calendar

You are receiving this courtesy email at the account [adrian.jeffreys@premiers.qld.gov.au](mailto:adrian.jeffreys@premiers.qld.gov.au) because you are an attendee of this event.

To stop receiving future notifications for this event, decline this event. Alternatively, you can sign up for a Google account at <https://www.google.com/calendar/> and control your notification settings for your entire calendar.



invite.ics

**Daniel Smith**

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**From:** Mark Powell [mark@santosantoro.com]  
**Sent:** Tuesday, 18 December 2012 5:35 PM  
**To:** Adrian Jeffreys  
**Cc:** Santo Santoro  
**Subject:** Re: Request for meeting with Executive Director, Environment and Resources Policy, Department of the Premier and Cabinet - Stormwater360

Dear Adrian

Thank you for meeting with CTPI from Stormwater360 earlier today.

Santo and I would like to extend our thanks for the personal and professional courtesies that you extended to us and your goodwill towards Stormwater360 and arguments in terms of the importance of water quality outcomes.

We were reassured by your knowledge and understanding of the matters that were raised in terms of water sensitive urban design and related concerns about the pollution of waterways and catchments. As I mentioned during our meeting, Stormwater360 are available and very keen to provide any additional information on the impact of the new single planning policy at the appropriate time, including expert advice from a range of industry and environmental outcome perspectives.

Once again, thank you very much for the opportunity to discuss these matters with you and for your advice.

Kind regards

Mark Powell  
Partner  
Santoro Consulting

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P: +61 7 3262 4266  
F: +61 7 3262 9965  
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On 11/12/2012, at 2:49 PM, Mark Powell <mark@santosantoro.com> wrote:

Dear Adrian

Further to our telephone conversation yesterday, I would like to confirm our meeting on Tuesday 18th December 2012 at 2pm. Can you please confirm that will be on the 14th Floor of the Executive Building, 100 George Street, Brisbane?

Please let me know if you have any questions or would like any further information. Otherwise, [CTPI] and I look forward to seeing you on the 18th.

Kind regards

Mark Powell  
Partner  
Santoro Consulting

M: +61 [CTPI]  
P: +61 7 3262 4266  
F: +61 7 3262 9965  
E: [mark@santosantoro.com](mailto:mark@santosantoro.com)  
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