



Reference: 023-23 JM

SYDNEY COASTAL COUNCILS GROUP Inc.

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Friday, 27 October 2023

Submission to NSW Government

Re: Guidelines for Erosion and Sediment Control on Building Sites (the Guidelines)

Thank you for the opportunity to comment on the updated Guidelines. The purpose of the Guidelines is to help small-scale builders, certifiers, stormwater specialists and those working on construction sites that are less than 2,500m² understand their obligations and how to prevent erosion and sediment pollution to protect our waterways.

We write on behalf of four council representative groups in Sydney, being Cooks River Alliance, Georges River Keeper, Parramatta River Catchment Group and the Sydney Coastal Councils Group. Our ROCs have a strong focus on catchment management for waterway health, especially through minimising the effects of stormwater runoff on local water quality.

Developers and builders play an important role in preventing sediment laden runoff from building sites. You may be aware that our organisations have been working together for many years in a joint taskforce known as Get the Site Right, involving a coordinated compliance blitz for building sites held twice a year.

An update to the Guidelines is strongly supported, given the existing Guidelines were published in 2001 and contain some outdated techniques and are not best practice.

We note that the updated Guidelines have an increased focus on site planning: how to scope the site, what is required in an erosion and sediment control plan and a construction-ready checklist. Other changes include amendments to outdated guidance, a consolidated document that is easier to read and greater detail on important aspects of erosion and sediment control.

We provide the following comments on specific aspects of the updated Guidelines.

Consolidated document

The format of the updated Guidelines is much improved over the current Guidelines. The context of preparing the erosion and sediment control plan and how to carry out the plan is more logical compared to the somewhat unconnected fact sheets and scant checklist in the current Guidelines.

Increased focus on site planning

Detailed site planning is fundamental to guide implementation of effective erosion and sediment controls. Our councils' inspections as part of the Get the Site Right campaigns regularly show inadequate sediment controls. Improvements to this should be assisted by the requirement to prepare an erosion and sediment control plan for the site.

Litter and Building Waste

The current Guidelines contain a fact sheet on litter and building waste for which details are not included in the updated Guidelines. Whilst there are some references to 'waste' and the risks of building waste/waste materials getting into runoff, there are no clear measures on how to contain waste. It is acknowledged that not all waste generated on site relates to erosion and sediment controls. However, uncontained building waste such as concrete waste can still end up in runoff. There are also no references to litter which should also be included as litter is a result of uncontained waste and could end up in site runoff and/or become wind blown and contaminate local waterways. Inadequate waste and litter management on building sites is regularly identified as an issue during our Get the Site Right campaigns.

Complement to the 'Blue Book'

It is important that the new Guidelines complement the definitive 'Blue Book' entitled *Managing Urban Stormwater: Soils and Construction, 4th edition* prepared by Landcom in 2004. The Blue Book supersedes the existing Guidelines and is recognised as industry best practice for larger sites with references to more detailed technical guidance.

More comprehensive construction-ready checklist

The checklist in the updated Guidelines is much improved, particularly as written in the context of checking controls that are in place rather than listing controls that should be implemented. Assigning roles and responsibilities and having site induction procedures are also great improvements, providing for greater accountability once works commence.

Inclusion of the updated Guidelines in the standard conditions of development consent

Referencing of the updated Guidelines in the standard conditions of development consent is very important. This enables councils to readily mandate the requirements in the Guidelines as part of a development consent and for the appropriate controls to be applied consistently across building sites and catchment areas in general.

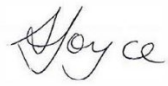
Recommendations

In summary of the comments above, we make the following recommendations:

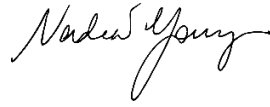
1. Consolidation of the Guidelines into one logical document with requirement for an erosion and sediment control plan and guidance on its implementation is fully supported.
2. A section on Litter and Building Waste should be added that includes identifying types of waste that will be generated, how to contain and manage waste and measures to prevent waste and litter leaving the site.
3. Alignment with the 'Blue Book' is a great improvement, providing stronger technical guidance and consistency with broader industry best practice.
4. The construction-ready checklist is strongly supported, to be completed prior to construction commencing and with accountabilities to ensure compliance during the works. The step relating to establishing stockpiles should include identifying waste stockpiles and containment areas.
5. Inclusion of the Guidelines in the standard conditions of development consent will greatly assist councils to mandate appropriate erosion and sediment controls.

If you have any queries, please contact me on 0407 733 075 or by email at executiveofficer@sydneycoastalcouncils.com.au

Yours sincerely,



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