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The Honourable Jarrod Bleijie MP

Deputy Premier, Minister for State Development, Infrastructure and Planning
and Minister for Industrial Relations

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Dear Minister Bleijie,

RE: Stormwater Queensland Submission on the Draft State Planning Policy (SPP) 2026

Stormwater Queensland (SQ) commends the Queensland Government on undertaking a comprehensive review of the State Planning Policy (SPP). As the peak industry body for stormwater management in Queensland, we have provided the following priority recommendations and comments on the Draft SPP 2026 to ensure that Queensland's SPP provides a clear, regional strategic planning framework which:

- Aligns with the Government's "Watertight" policy objectives to support productive use of water resources and future water security;
- Reduces development uncertainty, reduces "Red Tape" and facilitates development of resilient, liveable and affordable housing and infrastructure in an increasingly uncertain development environment;
- Improves outcomes for receiving environments compared to current business as usual stormwater management, including waterways and coastal/marine environments and supports local government to invest in catchment-scale initiatives to protect receiving environments; and
- Supports local governments to give full effect to the Strategic Aspirations of the SPP 2026, including Housing and Communities, Efficient Land Use Patterns, Responsive Infrastructure, Environment and Heritage, and Connected and Productive Regions.

These aspirations cannot be achieved without clear, measurable and integrated stormwater management requirements. Stormwater plays a critical role in delivering safe, resilient communities; protecting environmental values; supporting efficient land use; and ensuring infrastructure performs reliably under current and future climate conditions. Strengthening the integration of sustainable urban water management policy within the SPP 2026 is therefore essential to realising the Government's strategic intent.

The opportunity: Sustainable Urban Water Management

The review of the existing SPP creates an opportunity to reposition stormwater as a contributor to climate-resilient and liveable urban development, long-term water security and improve certainty for development, through sustainable urban water management (SUWM). Sustainable Urban Water Management is recognised as an important reframing of business as usual (BuA) urban water management to a more circular framework which recognises stormwater and wastewater as a valuable resource. Sustainable urban water management is integral to several of the proposed State Interests including:

- **Housing** – by improving liveability through urban cooling and supporting the safe delivery of new homes in areas affected by natural hazards and protecting and enhancing downstream receiving environments by reducing cumulative stormwater impacts from urban development.

- **Environment Heritage and Efficient growth** – by protecting and enhancing receiving environments, maintaining waterway environmental values (including Traditional Owner values) and reducing cumulative stormwater impacts from urban development.
- **Tourism** – by safeguarding high-value natural assets, including waterways, wetlands and coastal environments that underpin Queensland's tourism economy.
- **Water** – by supporting water-efficient urban design, stormwater harvesting and improved hydrologic performance to enhance long-term water security.
- **Natural hazards and Safety**– by mitigating hydrologic changes, reducing erosion and channel instability, managing runoff volumes and improving flood behaviour to protect communities and infrastructure.

A clear, regional strategic planning framework which incorporates SUWM principles within the SPP would facilitate:

- Futureproofing water supply for housing and economic development by harvesting stormwater to offset water demand and supporting water-efficient urban design;
- Increasing the resilience of existing and new infrastructure to climate change, natural hazards and urbanisation through water sensitive urban design (WSUD), green infrastructure and improved flow-regime management; and,
- Reducing and offsetting impacts of altered hydrology and stormwater quality on downstream waterways and receiving environments – including Queensland's Great Barrier Reef and Moreton Bay Marine Parks.

Stormwater Queensland has outlined our priority policy recommendations on the proposed revisions to the SPP and associated documents below. Further detailed comments and technical basis are then provided against selected changes in the Draft SPP 2026 and associated documents in the following sections.

STORMWATER QUEENSLAND

Priority recommendations for SPP 2026

#	Priority	SQ position / Policy change sought	Relevant SPP/Related document section	SQ detailed submission, refer:
1	**Embed sustainable urban water management within Strategic Aspirations and State Interests.**	Explicit recognition of SUWM in the Strategic Aspirations and State Interest Water.	SPP 2026 Part C Strategic Aspirations and Part D State Interests.	Draft SPP – State Interests and Policies (p7).
2	**Retain enforceable assessment benchmarks and triggers and improve stormwater design objectives to protect and enhance downstream receiving environments.**	SQ supports the preservation of water quality assessment benchmarks through incorporation in the Planning Regulation. SQ requests confirm that relocation of these does not weaken their effect. Retaining and strengthening reference to sustainable urban water management in the policy would support achieving sustainable development and receiving environment outcomes. The current stormwater management approaches based on the current design objectives are not protecting downstream environments and impede the delivery of strategic catchment-wide management. The design objectives should recognise and support alternative solutions where appropriate to improve receiving environment outcomes – also see Priority 3 below.	Future of Assessment Benchmarks, Table 6 Part 1.	Draft SPP – State Interests and Policies (p7-10). Future of Assessment Benchmarks – Development impacting on Water Quality (pp11-13).
3	**Strengthen hydrologic stormwater design objectives linked to receiving environment outcomes.**	Expand stormwater objectives beyond pollutant reduction to include runoff volume reduction, flow frequency management, peak flow management, channel stability and protection of receiving waterway function. The continued reliance on percentage-based pollutant reduction targets (e.g., standard load reduction criteria) fails to prevent environmental degradation and can leads to poorly integrated stormwater treatment infrastructure, which is problematic to implement and maintain, increasing burden on developers and local government. The stormwater management design objectives should reflect this, including a focus on volumetric reduction of stormwater discharge from development through incorporation of integrated water management and Deemed-to-Comply solutions (e.g., rainwater tanks, pervious area minimum requirements) that also achieve amenity, cooling and water efficiency outcomes and Strategic Off-site Offsets where appropriate.	Future of Assessment Benchmarks, Table 6 and (Current Appendix Table B, SPP 2017).	Draft SPP – State Interests and Policies (p7-10). Future of Assessment Benchmarks – Table 6: Development impacting on Water Quality (pp11-13)

4	**Reinstate climate adaptation as a cross-cutting planning principle.**	Mitigating and adapting to climate change is an important consideration for planning at all levels, and that all state interests should be applied and considered in the context of a changing climate. This is not reflected in the 2026 draft. The SPP should restore the requirement all relevant state interests to be considered in the context of a changing climate. This should be given effect through Part C as a Strategic Aspiration to guide the implementation of the State Interests.	SPP 2026 Part C Strategic Aspirations and Part D State Interests.	Draft SPP – Strategic Aspirations and Guiding Principles (p6)
5	**Provide clear and consistent natural hazard guidance.**	SQ supports the inclusion of the Natural Hazards and Safety state interest subject to future consultation. The proposed shift towards a risk-based planning approach needs to consider potential future climate changes, including flooding/hydrology. SQ recognises the proposed shift towards risk-based planning but seeks transparent and consistent criteria for acceptable, tolerable and intolerable flood risk for clear and consistent interpretation across Local Governments.	SPP 2026 Part C Strategic Aspirations and Part D State Interests. Future of Assessment Benchmarks – Table 4: Development in a Natural Hazard Area.	Draft SPP – State Interests and Policies (p7) Future of Assessment Benchmarks – Table 4: Development in a Natural Hazard Area (p10)
6	**Retain construction-phase ESC requirements while updating construction phase objectives to recognize contemporary stormwater management practice.**	Retain mandatory construction-phase stormwater management objectives which are consistent with best-practice erosion and sediment control requirements.	Future of Assessment Benchmarks, Table 6 and (Current Appendix 2 Table A, SPP 2017).	Future of Assessment Benchmarks – Table 6: Development impacting on Water Quality (p11-13).

Water by Design (Healthy Land & Water) have previously reviewed the QLD Stormwater Management Design Objectives and have proposed a blueprint for improving waterway management. Queensland Planning Policy – Water Quality State Interest – A Blueprint for Improving Waterway Management:
https://hlw.org.au/resources/downloads/water-by-design/wsud/reports/252-water-by-design-a-blueprint-for-improving-waterway-management-2020/file

This discussion paper was funded by the Department of Environment and Science, was completed in 2020 for the purposes of informing reviews of the State Planning Policy. It contains many recommendations pertinent to the SPP review. This content of this document was largely supported by Stormwater Queensland.

More detailed technical responses to specific document sections and changes from the previous SPP are included in the following pages. Stormwater Queensland would be pleased to meet in-person with the Department to discuss these priorities in detail.

Kind Regards,



Adrian Crocetti

President - Stormwater Queensland

Detailed Submission: Summary of Specific Changes and Responses

The following tables provide a detailed summary of SQ position and specific recommendations following our review of the Draft SPP 2026 and related consultation documents.

Draft SPP – Strategic Aspirations and Guiding Principles

Issue	Section/chapter/document	Summary of change	SQ position
New strategic aspirations	Draft SPP 2026, Part C – Strategic aspirations and guiding principles; SPP 2017 Part C	The 2026 draft introduces six Strategic Aspirations: • **Housing and communities** • **Efficient land use patterns,** • **Connected/productive regions** • **Responsive infrastructure,** • **Existing economic drivers, and** • **Emerging industries**. The strategic aspirations are intended to guide the direction for how state interests are put in practice and balancing of competing interests.	The current SPP states that mitigating and adapting to climate change is an important consideration for planning at all levels, and that all state interests should be applied and considered in the context of a changing climate. SQ recommends that the SPP require all relevant state interests to be considered in the context of current and projected climate change. Climate change is an issue that impacts all State Interests, including impacting on housing liveability and affordability, suitability of development areas for economic land/infrastructure and impacts on tourism, water and energy security etc. Climate change should be given effect through Part C as a Strategic Aspiration in order to provide clear guidance to Local Government in making decisions which require consideration of the relative importance of competing State Interests.
Climate adaptation is less explicit at the strategic level	SPP 2017 Part C; Draft SPP 2026 Part C	The 2017 SPP explicitly stated that all "*state interests should be applied and considered in the context of a changing climate"* and identified climate mitigation and adaptation as important considerations at all planning levels. The 2026 draft does not retain an equivalent overarching statement giving effect to climate change in the Strategic Aspirations/Guiding Principles, despite it having material impact on all State Interests.	

Draft SPP – State Interests and Policies

Issue	Section/chapter/document	Summary of change	SQ position
Sustainable urban water management	Draft SPP 2026 Part D – Water; SPP 2017 Environment and heritage / Water quality	The 2026 draft establishes the following revised State Interests and identifies their interaction with the Strategic Aspirations: • Housing • Economic Land • Tourism • Mining and Extractive Resources • Agriculture • Environment, Heritage and Efficient Growth • Natural hazards and safety • High impact and hazardous activities • Infrastructure • Energy • Water • Transport, aviation and ports infrastructure The 2017 SPP dealt with water quality under the Environment and heritage state interest. The 2026 draft establishes a standalone Water state interest, bringing water supply, water quality, catchments and receiving environments into a single state-interest framework.	SQ supports the stronger visibility of Water as a State Interest. The final framework should ensure that sustainable urban water management is considered as an essential part of a resilient, reliable and secure water supply within the State Interest: Water and across the state interests through the Strategic Aspirations. The current Government's Watertight policy represents a critical shift toward the "productive" use of water, acknowledging the value of our resources in a variable climate. This aligns with the landmark 2015 Australian Senate Inquiry, "Stormwater Management in Australia," which redefined stormwater from a waste product to a valuable resource. • Under-utilised Resource: National consensus identifies stormwater as a primary alternative water supply. • Productivity & Reliability: Integrating stormwater into broader planning is essential for regional water security and economic growth. • Infrastructure Synergy: Shifting toward SUWM simultaneously addresses pollution and increasing flood risks. Sustainable urban water management presents an opportunity to unlock water supply and make productive use of unallocated water reserves.

Receiving-water protection	Draft SPP 2026 Water policies; SPP 2017 Water quality policies	Both frameworks seek protection/enhancement of environmental values and achievement of water quality objectives, including avoiding or minimising development impacts on receiving waters. However, the draft SPP does not include any reference to particular objectives or targets. These are expected to be contained within subordinate legislation and remain as per the 2017 Appendix 2 values.	**Critical Policy Deficit: Inadequacy of Current Pollutant Reduction Targets.** The continued reliance on percentage-based pollutant reduction targets (e.g., standard load reduction criteria) fails to prevent environmental degradation. • **Net Load Increases:** Percentage-based targets merely mitigate the severity of urban impacts; they do not neutralize them. Applying a percentage reduction to an expanded urban footprint still results in a net increase in total annual pollutant loads (TSS, TP, TN) entering receiving environments in some instances. • **Cumulative Catchment Degradation:** Across expanding growth corridors, the cumulative delivery of residual pollutant loads and unmitigated runoff volumes directly drives the ongoing ecological decline of Queensland's aquatic ecosystems. • **Risk to Iconic Assets:** Continued reliance on these legacy targets will perpetuate documented water quality deterioration in high-value receiving waters, including **Moreton Bay, the Great Sandy Strait, and coastal river estuaries**, as well as contributing to catchment-wide pollutant stress across **Great Barrier Reef catchments**. **Strategic Recommendation:** To achieve true protection and enhancement of environmental values, the SPP must evolve beyond legacy percentage reduction targets. The framework should transition toward **Sustainable Urban Water Management (SUWM)** principles that combine volume reduction, runoff retention, and stormwater harvesting. Treating stormwater as a resource directly prevents polluted volumes from reaching receiving waters, offering a predictable, performance-based pathway that safeguards iconic natural assets while supporting sustainable growth.

			A strategic SUWM plan should be based on an understanding of receiving waterway condition and values. When used appropriately, it may supersede the water quality reduction targets on a site-by-site basis, in favour of place-based planning that delivers infrastructure efficiency, and strategic mitigations that respond to drivers of decline, delivered where and when they are needed. Such a plan may promote efficiency in assessment, drive certainty for developers, and deliver greater overall benefit to the environment.
Explicit reference to WSUD terminology has been removed	SPP 2017 Water quality explanatory material; Draft SPP 2026 Water	The 2017 SPP expressly recognised WSUD as an important approach to managing stormwater runoff impacts on environmental values of receiving waters and supported innovative, locally appropriate stormwater solutions. The 2026 draft does not use the term WSUD in the equivalent policy framework	SQ recommends restoring explicit reference to SUWM or WSUD. The terms are well established in Queensland practice and provides a useful bridge between stormwater quality, hydrology, urban design, waterway health and climate resilience. SQ recommends that the final SPP expressly recognise SUWM as a mechanism for achieving flood resilience, water-quality, waterway, liveability and climate-adaptation outcomes. This is required to provide clear strategic policy guidance to Local Government when applying the State Interest Water.
Stormwater quality and hydrology	Draft SPP 2026 Water policy 4(a); SPP 2017 Water quality policy 2	Both retain policy requirements to avoid, minimise adverse impacts on environmental values of receiving waters. Slight change in terminology from “altered stormwater quality and hydrology” (2017 SPP) to “reduced stormwater quality and hydrology” (2026 draft).	SQ supports the intent to avoid, minimise impacts on receiving environments. Clarification of altered terminology is required to understand the policy implications.
State Interest: Natural hazards and safety	Draft SPP 2026 Part D – Natural hazards and safety; SPP 2017 Part E - Planning for safety and resilience to hazards; State Planning Policy 2017 Review Discussion paper: Natural hazards land use planning	2026 SPP retains a state interest for Natural hazards and safety. Removes references to climate change projections in planning for natural hazards.	The draft SPP moves to acceptable/tolerable risk approach and infrastructure resilience. SPP2017 explicitly reference climate change through the document, the draft SPP has much less explicit climate change language. The draft moves towards a risk-based approach that may allow development in natural-hazard areas where risk can be

		The draft SPP also shifts the hierarchy from 'avoid then mitigate' policies to 'avoid where the risk cannot be mitigated to an acceptable or tolerable risk'.	reduced to an "acceptable" or "tolerable" level. There is no definition of numerical flood risk thresholds. Neither concept is sufficiently objective without supporting thresholds, methodologies and guidance. Different councils, applicants and experts may reach materially different conclusions about the same risk. This is particularly important for flood-prone councils. Without clear statewide criteria, the policy may increase rather than reduce inconsistency in flood controls. The SPP should require or provide statewide definitions, risk tolerability criteria, climate allowances, minimum planning horizons and transparent methods for demonstrating risk reduction.

Future of Assessment Benchmarks – Table 4: Development in a Natural Hazard Area

Issue	Section/chapter/document	Summary of change	SQ position
Natural-hazard benchmarks are currently proposed to be retained like-for-like subject to future review	Future of Assessment Benchmarks, Table 4; Future of Assessment Benchmarks overview	The benchmarks have not yet been fully updated to reflect the draft SPP's new terminology and policy framework. They will be reviewed following public notification and further natural-hazard policy work.	SQ supports in principle the retention of natural hazard benchmarks, subject to further consultation on proposed inclusions. For many local governments in Queensland, there is low capacity to adequately assess technical assessments to ensure risks and exposure are appropriate for their communities. Devolving responsibility for the assessment of these matters places substantial burden on local government, uncertainty for developers and potentially longer timeframes to approval brought about by unclear benchmarks regarding acceptable risk exposure. The SPP should require or provide statewide definitions, risk tolerability criteria, climate allowances, minimum planning horizons and transparent methods for demonstrating risk reduction. This assists in providing development certainty and ensuring development is delivered in a resilient manner to current and future natural hazards.

Future of Assessment Benchmarks – Table 6: Development impacting on Water Quality

Issue	Section/chapter/document	Summary of change	SQ comment
Assessment benchmarks (current SPP Appendix 2) proposed to be moved to subordinate legislation.	Future of Assessment Benchmarks, Table 6 Part 1 and Part 2; SPP 2017 Appendix 2 Table B / water-quality assessment benchmark application	Policy intent is to include Appendix 2 content in subordinate legislation to have the same effect, with the location/drafting to be determined (e.g. Environmental Protection (Water and Wetland Biodiversity) Policy 2019 (EPP Water and Wetland Biodiversity) under the Environmental Protection Act 1994).	SQ supports in principle the inclusion of the Assessment benchmarks being incorporated in subordinate legislation.
Part 1 application thresholds: 'and' to 'or' in relation to application for Receiving Waters	Future of Assessment Benchmarks, Table 6 Part 1 – Application of schedule – receiving waters; SPP 2017 Appendix 2 Table B / water-quality assessment benchmark application	The SPP 2017 post-construction stormwater management design objectives state: *For receiving waters, a development application for:* *(1) a material change of use for an urban purpose that involves premises 2500 m^2 or greater in size* ***and****;* *(a) will result in six or more dwellings;* ***or*** *(b) will result in an impervious area greater than 25 per cent of the net developable area;* ***or*** *(2) reconfiguring a lot for an urban purpose that involves premises 2500 m^2 or greater in size and will result in six or more lots;* ***or*** *(3) operational works for an urban purpose that involves disturbing a land area 2500 m^2 or greater in size.* The proposed 2026 draft Table 6 Part 1 states: *For receiving waters, this schedule applies in relation to a development applications for:*	SQ recommends that the Department confirm whether the change from 'and' to 'or' is intentional. If intentional, the change should be clearly identified in the explanatory material because it materially expands the application of the post-construction receiving-water benchmarks. SQ considers that the 2500 m^2 threshold should be removed as broader application is appropriate where development with fewer than 2,500 m^2 can nevertheless generate significant stormwater impacts, particularly where it creates six or more dwellings or a high impervious fraction.

		a) a material change of use for an urban purpose that involves premises 2500 m^2 or greater in size, ***or*** *i. will result in six or more dwellings,* ***or*** *ii. will result in an impervious area greater than 25 per cent of the net developable area,* ***or*** *b) reconfiguring a lot for an urban purpose that involves premises 2500 m^2 or greater in size and will result in six or more lots,* ***or*** *c) operational works for an urban purpose that involves disturbing a land area 2500m^2 or greater in size.*	
Stormwater management design objectives (construction).	Future of Assessment Benchmarks Table 6 Part 2; SPP 2017 Part E Assessment Benchmarks-water quality, Appendix 2 Table A	The proposed relocated assessment benchmarks continue to address adverse impacts on receiving waters arising from stormwater quality and hydrology, wastewater, artificial waterways and mobilisation of nutrients and sediments. No proposed changes to construction phase stormwater management design objectives. Reference to a suitably qualified person should be amended to a suitably qualified person in erosion and sediment control. This now includes a Registered Soil Practitioner – Erosion and Sediment Control, as well as a CPESC. An RPEQ can be appropriate for the engineering aspects; however, they must be knowledgeable in soil science and vegetation/rehabilitation if no other professional is involved.	SQ recommends that a risk based assessment for sediment control as provided in IECA is more appropriate for small sites than the need to adopt a HES basin to treat 80% of the AARV for all sites greater than 2500m^2. It is virtually impossible to include a HES basin or an enlarged Type D basin on a site less than 5,000m^2 The IECA soil loss method allows an assessment of the actual risk. If the site is less than 10,000m^2 and is flat or with reasonably erosion resistant soils, then a HES basin should not be required if the estimated soil loss is low. Additional controls could be included if the downstream environment is sensitive.

Stormwater management design objectives (post-construction).	Future of Assessment Benchmarks Table 6 Part 2; SPP 2017 Part E Assessment Benchmarks-water quality, Appendix 2 Table B	The proposed relocated assessment benchmarks continue to address adverse impacts on receiving waters arising from stormwater quality and hydrology, wastewater, artificial waterways and mobilisation of nutrients and sediments. No proposed changes to pollutant reduction targets or water stability objectives or deemed to comply bioretention sizing.	SQ recommends that stormwater management should not be narrowly focused on pollutant-load reduction at the expense of flow regime, channel stability, erosion, flood behaviour and ecological function. The stormwater management design objectives should reflect this, including a focus on volumetric reduction of stormwater discharge from development through incorporation of integrated water management and green infrastructure (e.g. rainwater tanks, pervious area requirements).

References

Draft State Planning Policy 2026: https://www.planning.qld.gov.au/__data/assets/pdf_file/0021/116292/draft-state-planning-policy-2026.pdf

The Future of Assessment Benchmarks: https://www.planning.qld.gov.au/__data/assets/pdf_file/0020/116660/the-future-of-assessment-benchmarks.pdf

Discussion paper: Natural hazards land use planning: https://www.planning.qld.gov.au/__data/assets/pdf_file/0028/116659/discussion-paper-natural-hazards-land-use-planning.pdf

State Planning Policy July 2017: https://www.planning.qld.gov.au/__data/assets/pdf_file/0014/114314/state-planning-policy-july-2017.pdf