AUSTRALIAN WATER ASSOCIATION

18/03/2026

Kiersten Fishburn
Secretary
Department of Planning, Housing and Infrastructure

Final Submission to DPE GDP Resilience Planning Mailbox

Re: Submission to the NSW DPHI's Climate Change & Natural Hazards SEPP, Explanation of Intended Effect package, 2026

Dear Kiersten,

The Australian Water Association (AWA) welcomes the opportunity to provide this submission in response to the NSW Government's proposed Climate Change and Natural Hazards State Environmental Planning Policy (SEPP), specifically the Draft Urban Heat Policy Statement.

As the national, member-based peak body for the Australian water sector, AWA represents over 5,000 professionals and organisations across utilities, government, industry, and academia. Our mission is to promote sustainable water management and advocate for a secure and resilient water future for all Australians.

Water will play a paramount role in cooling cities, and water management practices are critical in achieving necessary reductions in urban heat experienced across NSW. To mitigate the impacts of urban heat, Water Sensitive Urban Design (WSUD) principles including passive irrigation, recycled water schemes and green spaces must be incorporated into high-level planning and land use decisions to design greener and cooler cities. Currently, the key planning principles of the Draft Urban Heat Policy Statement are not strong enough to ensure that water sensitive design principles are considered during the planning phase of developments and implemented successfully. Specifically, the second planning principle must be strengthened to **require** the implementation of planning and design measures that will **ensure** communities can adapt to increased heat. There is a unique opportunity to improve urban heat and achieve strategic water targets that align with government initiatives, such as the Greater Sydney Water Strategy.

1. RESPONSE TO FEEDBACK QUESTIONS

Do you support the proposal to introduce the Urban Heat Policy to encourage greater consideration of urban heat in land use planning decisions?

Yes - improved consideration of the effects of urban heat in land use planning decisions should encourage the design of a Water Sensitive City. The Draft Urban Heat Policy (hereafter the policy) must clearly recognise the role water must play to create liveable communities that are resilient to the worsening effects of urban heat. Through establishing urban heat reduction targets for new and existing developments across the state, appropriate solutions such as blue-green corridors,

stormwater harvesting and reuse schemes, place-based WSUD initiatives, reflective building materials and improved street orientations can be implemented early enough during the planning process to be successfully planned and delivered.

Furthermore, the language of the second key planning principles should be strengthened to ensure that design measures are implemented to **ensure** (rather than support) community adaptation to increased heat. Designing cool refuges and providing shade (as described in the third planning principles) are reactive solutions to the impacts caused by urban heat. Instead, new developments should be proactive in managing urban heat, by mandating design measures to ensure cooler cities; particularly stormwater harvesting or connection to water recycling schemes to irrigate more green spaces.

What guidance or supporting materials will be needed to ensure urban heat considerations are appropriate for different contexts and climate zones?

Site-specific urban heat scoping studies should be mandated for new development areas to recognise the hazards of different contexts and climate zones. These studies should provide evidence that new developments will not contribute to a net increase in urban heat. There are industry tools and scenario modelling packages that allow such prescriptive requirements to be met when considering urban heat across all stages of urban planning.

Specific guidance should be provided to new developments when implementing water-focused initiatives to mitigate urban heat, to support the delivery of the second key planning principle. For instance, Blacktown City Council's 'WSUD Developer Handbook' is an excellent resource for designing and modelling the performance of stormwater management measures and could be expanded to also capture how WSUD initiatives can improve urban heat.

Do you support the proposal to develop urban heat provisions in the CC&NH SEPP? Where should such provisions apply and to what type of development?

Yes. If a staged approach of applying urban heat provisions to State Significant Development (SSD) only is used, a roadmap or pathway must be in place to ensure that urban heat is considered across all planning decisions.

Are there any other opportunities to build resilience to urban heat in the planning system?

Designing water sensitive urban cities will build resilience towards urban heat within communities, alongside delivering a range of parallel benefits including improved water quality and ecosystem health, incorporating and honouring Traditional Knowledge, creating liveable and beautiful cities, improved community health and wellbeing, and sustainable water resource management.

To achieve these outcomes; land use planning decisions should embed controls that increase passive irrigation through increased permeable areas, support the development of integrated water recycling systems, and increase green spaces including green roofs, canopy cover, and

green walls. The policy must provide a holistic delivery framework of these outcomes to build liveable cities that are cooler, greener and more resilient to a warming climate. Any decisions should not be seen in isolation to avoid any unintended consequences. For example, increased green canopy cover must be designed to minimise the risk of tree root intrusion to water pipes, roads or pathways, and canopies must be positioned within proximity to a sustainable and 'fit for purpose' water supply.

Land use planning decisions can be formulated to achieve the strategic delivery of recycled water schemes, involving the design of infrastructure to divert, harvest and treat stormwater for use in irrigation. Opportunities for recycled water supply can be identified by local utilities, however, require early coordination and substantive demands to justify the investment costs to establish or augment networks to deliver recycled water. Furthermore, most distribution networks operate under mixed ownership in metropolitan areas where medium-density and high-density developments will occur, often complicating the implementation of centralised water reuse schemes.

Targeted planning controls are an effective mechanism to **mandate** the use of recycled water for creating the green spaces that are required to cool communities and mitigate urban heat. Additionally, recycled water is a climate independent water supply that will still be available during periods of low rainfall, which is likely when cities will be their hottest and most in need of cooling. The strategic use of planning instruments can provide opportunities for investment and specific stakeholders to claim responsibility for recycled water schemes, further reducing risk and sharing cost amongst beneficiaries.

Strategic consideration of these recommendations during land use planning will contribute to improved resilience in urban heat.

AWA welcomes the opportunity to discuss this submission further.

Yours sincerely,

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