

Confidentiality Requested: yes

Submitted by a Planner: no

Disclosable Political Donation:

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Content:

My submission relates to the changes to both the Infrastructure SEPP and the EP&A Act Regulations, that allow certifiers to issue Complying Development Certificates for lead-in water and wastewater mains, ie, pipelines connecting new residential developments to existing water and wastewater networks.

Presently independent statutory authorities like Sydney Water or City Councils approve these mains and their associated environmental impacts. These organisations have trained resources dedicated to the task of ensuring that all relevant environmental impacts are considered and mitigated in the approval and construction processes.

Questions that I would like answered are as follows;

1. How is the proposed independent certification and approval process going to achieve similar environmental outcomes to existing processes, when there is no verification of compliance proposed in the new system?
2. Lets say that a certifier finds on site that one or two practical and achievable conditions limiting the spatial extent of construction activity, enable a Complying Development Certificate to be issued for a given lead in main project. The most effective response is to condition the CDC. How does the new system ensure that the constructor complies with the conditions of the CDC? Where is the

requirement for the independent certifier to verify compliance? How will with Department know that environmental outcomes are not being compromised by the new system?

3. The Building Professionals Board (BPB) lists a number of categories of accreditation that certifiers are accredited under. It is unclear which category of accreditation is going to be applied to certifying lead-in mains; is the Department going to determine this?

4. Lead in main projects are many and varied in the scope and potential environmental impacts; simple straight-forward CDC jobs, and projects with complex interactions with the natural environment, requiring conditions and mitigative measures. How is the BPB accreditation system going to account for this? Will a new category of accreditation be developed and applied, eg, Linear Infrastructure Certification? Will minimum standards of skills and experience relating to linear infrastructure projects be specified in one or more existing categories of accreditation?

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Submission: Online Submission from [REDACTED] (comments)

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Submission for Job: #8118

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