
General Comments

The Greater Geelong City Council supports the need for an approach which addresses the risks and opportunities with respect to best practice stormwater management, and in particular for regional Victoria. The service level expectations of the general public are high, and in maintaining stormwater services to the public we must consider where deficiencies in the systems are occurring.

A noticeable increased focus on building community resilience and identifying high levels of risk have not been well reflected in the planning framework and has resulted in challenges in control and enforcement. Risk from stormwater flooding is a real and growing risk in our built up environmental and falls into the grey area between planning and emergency management.

As a result and from our experiences, stormwater management is not well advocated for by DELWP. It is understood that regional councils have directed their focus for leadership to Melbourne Water and local floodplain management authorities which do not align with the stormwater management arrangements which these regional councils operate under.

Acknowledging the limited leadership for regional councils, Greater Geelong City Council has prepared its own draft Issues Paper for stormwater management identifying the need to do more to manage stormwater effectively, particularly in lieu of climate change and projected population growth.

Greater Geelong City Council manages more than 300 stormwater catchments, approximately 150 of which are in urban areas. The total estimated value of our drainage assets is \$604 million.

Like many governments across Australia and internationally, managing stormwater is becoming an increasing challenge. Some of the issues we face include:

- flood risks, which are likely to increase with predicted impacts of climate change
- lack of a clear authority in legislation
- managing growth
- coordinating development
- ageing infrastructure
- predicted budget shortfalls
- lack of a coordinating authority
- poor information about our network
- no clear process for handling requests for service.

Our vision is for Greater Geelong to become a leader in managing stormwater and serve as an example for all regional councils. We have a series of actions planned that will address the following priorities:

- Planning to manage stormwater more effectively.
- Improving what we know about our network.
- Establishing a systematic way to prioritise work.
- Improving customer satisfaction and communication.

Any advancement of Council's stormwater management practices are dependent on its own funding, with limited state and federal funding opportunities which address the broader stormwater management issues. Hence the pressures on local government budgets, such as rate capping directly impact progress towards best practices.

Our stormwater network is facing a number of significant challenges both now and in the future. Major investment and leadership is needed to achieve significantly better outcomes overall – financially, environmentally and operationally.

While the Committee's Terms of Reference has been established, this submission provides insight and justification for this to be reviewed and expanded to become a holistic approach to improving stormwater management compared with the metropolitan and planning based issues paper which has been prepared.

Are there any other key issues or opportunities (directly related to the Committee's TOR) that the Committee should consider?

Currently within Victorian Stormwater Policy there is a need to strengthen the policy around how stormwater management responds to stormwater flooding risk. The state and regional floodplain management strategies acknowledge this is an area of concern.

Recently developed DELWP guidelines for "development of flood prone land" focus on addressing controls within riverine flooded areas, and although these guidelines acknowledge that there are many sources of flooding which need to be responded to with appropriate planning and building controls, any guidance around stormwater flooding is missing.

In metropolitan areas, councils and Melbourne Water share significantly more resources for, and the relationship of floodplain management is defined and clearly led by Melbourne Water. There are notably fewer issues than those faced by regional councils who often defer to Melbourne Water policy which does not align with the regional council arrangements.

There is a lack of appreciation for the flood risk and safety requirements with regards to emergency management, and appropriate sizing of stormwater infrastructure. Consideration of overland flow paths and flash flood risk in new development and existing urban areas is needed to address both quality and quantity in stormwater requirements. It has been well documented in state strategies that Clause 56 of the planning scheme does not sufficiently address these requirements.

There is a deficiency in the consistency in flood data capture and sharing for our emergency services and in funding availability across the riverine and urban flooding situation. This is compounded by inconsistency with urban and regional council stormwater management. Risk is not well considered in stormwater management and planning as it relies on external assessments from engineering personnel and guidance from initiatives such as the Infrastructure Design Manual (IDM).

The increases of flood frequency and volume of stormwater for events up to and including the 1% AEP which are not addressed in the planning scheme requirements has resulted in issues in poor stormwater planning outcomes and deficiencies in the drainage network. Assessment of stormwater for development has not been required at a catchment level, which has led to many unresolved issues between landowners and council where development have controlled flow to pre-developed conditions but did not consider frequency and volume of water and the effect this would have on downstream environments.

2.1 Opportunities to extent the coverage of stormwater planning requirements

What are your views on the conceptual planning control options? Page 17

What (complementary) changes to the building and plumbing regulations to guidance or any other mechanisms, are needed? Page 17

Greater Geelong City Council supports the extension of the current BPEM to include both commercial and industrial land uses which was previously unclear.

Some of the structures listed may need to be assessed for other reasons not just quality, there are many more reasons beyond meeting the SEPP guidelines in relation to why certain development types may need to be considered by council.

The trigger for consideration of internal processes is important, councils operate differently in relation to standard considerations and or specialised assessment relating to overlay triggers and local planning policy clauses.

Current plumbing regulations need to reflect new Australian Rainfall and Runoff (ARR), best practice and apply uniformly as they are not robust enough to consider all aspects of stormwater management and do not take into consideration catchment context and minimum standards for building protection from overland flow. These standards are also not well enforced, which results in issues related to the minimum freeboards for all dwellings to external surfaces and assessment of overland flow risk to building openings. A noticeable increase in the number of slabs constructed at ground level and as such above floor flooding to new homes where no flood overlay controls exists and no minimum standards of protection is occurring.

Onsite detention design and compliance is a concern for councils and managed inconsistently given the solutions are not able to be applied a “one size fits all” solution. Compliance is left to the building surveyor who can often have limited knowledge relating to the issues or it fails to be considered at all.

2.2 Opportunities to provide broader benefits

What stormwater planning provisions, or other mechanisms, would help to deliver the broader benefits listed above? Page 18

A state government stormwater management policy, and subsequent practice notes and guidelines would better support councils in seeking compliance with minimum standards and provide a path to best practice. Reflect these standards and require them for new developments.

Addressing the policy and legislative deficiencies around water management issues, and in particularly stormwater for both in new and established areas. Strengthening the consideration of capability and risk of intensification of catchments, based on performance of existing stormwater infrastructure.

Consideration should also be given to either expanding the stormwater management structure Melbourne Water provides metropolitan councils to cover all of Victoria, or review the function and focus of Catchment Management Authorities to include stormwater as part of their active responsibility.

Councils are drainage authorities. They need power over all drainage easements in their municipality and power over those drains that are not in easements, in the same way that other authorities have under the Water Act. The current provisions do not provide councils with the powers that they need to perform their functions.

2.3 Opportunities to deliver a 'place based approach

Should stormwater standards vary spatially and, if so, on what basis and at what scale? How can the planning system be used to guide and implement local IWM related standards? Page 18

It is clear that many variables impact on the ability of development to achieve stormwater standards. Varying them spatially would be difficult in delivering consistency across the drainage network. Some areas need to respond to the sensitivity of the site limitations, existing issues and constraints, however minimum standards should generally be uniform. Local, site based stormwater management plans and IWM plans should then seek to respond to these specifically.

Good stormwater management plans and IWM plans are built on a strong understanding of the site and wider catchment and working within the limits of these constraints to deliver an outcomes which achieves compliance with all standards.

IWM plans may need to become a permit requirements for subdivision and or a description of what must be considered outlined in the LPP. This may replace or encompass the need for stormwater management plans, surface water management plans, drainage management plans and flood risk reporting. However, the current application of IWM is inconsistent due to the lack of holistic stormwater management policy, practice notes and guidelines which misses the point of IWM.

2.4 Opportunities to link water management and urban planning

How should IWM Forum plans, and or frameworks (Section 1.6) be linked to the planning system? Page 19

What mechanisms should be used to strengthen the links between water management and public realm planning or the planning system more broadly? Page 19

What guidance material to tools are needed to help implement stormwater management through the planning system? Page 19

The Forums themselves are still exploring their role and governance in relation to good water cycle planning. Whilst these plans can help to identify issues and support investigation of broader solutions which support planning outcomes, the scope of area based IWM is yet to be well defined. If done properly IWM could help in leveraging funding to resolve issues in developed areas and or ensure future planning considers all necessary catchment constraints in a much more holistic and comprehensive manner etc.

Guidance material at a state level would benefit regional councils. Councils are required to defer to Melbourne Water standards and guidelines in the absences of local or state documentation. The policies and guidelines used by Melbourne Water are not ideally used by regional councils due to the different arrangements and responsibilities.

With the complexity of stormwater management and design requirements councils can also experience difficulty in finding the right resources to fulfil the needs for robust assessment on systems. In most cases, new systems are being designed by developers and consultants and accepted in good faith. There is a concern and evident risk of councils taking delivery of stormwater networks which may be deficient, don't respond to catchment conditions appropriately, don't meet current standards or constructed poorly and don't function as they are designed to.

2.5 Opportunities to improve compliance and implementation

Where are the weakest links in the chain of compliance and implementation of stormwater management requirements (including design, operation and people related issues)?Page 20

What actions are the most critical to improve compliance and implementation? Page 20

There is a disconnect between the compliance of design requirements in stormwater management and the construction to specified designs resulting in ineffective stormwater assets and future issues with maintenance of the systems in order to ensure that they are functioning as intended. With the expansion of the networks this is becoming a difficult and costly exercise for councils to facilitate. Noting a likely increase in requirements from future SEPP revisions, it is necessary for planning controls and legislation to provide councils with means and support to enforce the intended outcomes.

Design controls, maintenance plans, as constructed plans, asset handover / compliance procedures and guidelines are needed to support councils and have been identified by Greater Geelong City Council as a priority. Councils use the planning system as a means of controlling poor development outcomes, and as such need targets and grounds for refusing development as necessary.

It has become increasingly difficult to refuse intensification within developed areas based on risk and capacity of the existing systems, potentially due to the state focus on growth which often comes with consequences of cumulative impact of increasing intensification in some catchments.

2.6 Opportunities to support stormwater management in the public realm

What would help responsible authorities to determine and communicate the costs and benefits of public stormwater infrastructure? Page 22

What mechanisms should councils use to recover the construction and maintenance costs of public stormwater infrastructure? Page 22

Should offset be used to improve stormwater management? If so, how should they be used? P22

More data collection and sharing, revising decision guidelines based on this data creates an effective feedback loop and is responsive to market changes and council experience in relation to difficult to manage assets, costs associated with certain assets, effectiveness. We just don't know enough about the systems we are managing, many unfounded assumptions.

Not really sure how to best communicate the true cost to the public. It is difficult for many to understand that level of service offered by older stormwater infrastructure.

Greater funding opportunities around stormwater would be beneficial to the councils in relation to address existing issues and setting up mechanisms to better manage stormwater in to the future. The continuation and expansion of such funding programs such as NDRGS to include stormwater mitigation in addition to riverine mitigation would be supported.

Greater Geelong City Council has established a voluntary offsets policy to provide an opportunity in smaller scale developments and in areas of brownfield / in-fill development to contribute to a more appropriate catchment based response. The fact that these types of initiatives can currently only be voluntary due the limitations in the planning scheme and result in inefficient stormwater outcomes. Determination of the offset value is also likely to be subjective due to the differences in catchments and the effort required to establish a catchment based scheme is beyond most regional councils.