

4 July 2017

Improving Stormwater Management Advisory Committee
Department of Environment, Land, Water and Planning
PO Box 500
Melbourne VIC 8002
Via email: stormwater@delwp.vic.gov.au

Dear Committee Members

Re: Improving Stormwater Management Advisory Committee Issues Paper

The Victorian Water Industry Association (VicWater) is grateful to have an opportunity to respond to the Improving Stormwater Management Advisory Committee Issues Paper. VicWater is the peak body of the Victorian Water Industry, with its membership constituted by Victoria's statutory water corporations. Those corporations are responsible for the provision of urban water and wastewater services, rural water supply, including irrigation, and related drainage services.

VicWater acknowledges the well-established case for improving stormwater management that is articulated in the Issues Paper. The planning scheme clearly needs to play a stronger role in protecting waterways and delivering broader benefits from integrated water management.

The Issues Paper focuses primarily on the types of stormwater management issues that the Victorian planning and development system currently has, or could have, a role in addressing. This submission will provide broad feedback on the overall direction of the Issues Paper along with specific comments on water corporations' ongoing role within this regime.

- ◆ There are very few references to the EPA in the Issues Paper (mainly they are in relation to the EPA's review of the stormwater BPEM). The Advisory Committee is at risk of missing a significant opportunity to link the planning scheme (which is only relevant during a planning approval process) with a role for the EPA to ensure ongoing compliance with standards. The Environment Protection Bill 2018 establishes a general environmental duty which, when linked to the planning scheme, can make standards enforceable over the longer term and provide for continuous improvement. The possibilities that arise from these linkages should be a central feature of the Advisory Committee's report.
- ◆ Water corporations are investigating innovative opportunities to deliver improved stormwater management – when it relates to their core service delivery functions.
- ◆ An opportunity to improve waterway health, that may have been overlooked, is to divert polluting stormwater into the sewer network in particular circumstances. Yarra Valley Water (YVW) is

investigating the possibility of a 'first flush to sewer' system to intercept highly polluted stormwater in the Merri Creek catchment, as part of a regulatory offset against their sewer network.

- ◆ Further opportunities exist to connect individual property's drains (where they are known to pollute the stormwater and the sewer network capacity allows) to the sewer network via trade waste agreements. Or, to connect 'first flush to sewer' system at the industrial precinct scale. The Advisory Committee could consider the role of the planning scheme in these innovative solutions (and other funding or regulatory impediments that are faced).
- ◆ Water corporations will support other agencies, or local government, to deliver improved stormwater management – when it does not relate to their core service delivery functions, via integrated water management planning processes.
- ◆ The paper describes the contribution of improved stormwater management to liveable and resilient towns and cities (figure 1). However, it is difficult to link individual proposals and actions to those 'contributions'. It may be helpful to specifically identify the outcomes that are sought by policy changes, for example: improved waterway health, reduced urban flooding, water supply augmentation, reduced urban heat and increased green space.
- ◆ Clearly articulating the desired outcomes can help quantify the benefits of proposed changes as well as establish clear roles and responsibilities among parties, including for water corporations.
- ◆ (In response to question 2 in section 2.1) water corporations have identified gaps in the building and plumbing regulatory framework as it applies to recycled water, that can increase the risks of recycled water cross connections with potable outlets. These gaps apply equally to unintended cross connections between rainwater tanks and potable outlets and should be considered by the Advisory Committee.
- ◆ (In response to question 1 in section 2.4) it is council's role to provide a link between water corporations, IWM plans and the planning scheme. It is unclear what benefit would arise from linking IWM plans to the planning scheme that would outweigh the risk of adding red tape.
- ◆ (In response to question 1 and 2 in section 2.5) there remains an outstanding issue of the Prescribed Industrial Waste treatment of stormwater sediments in rain gardens, which significantly increases the cost of maintaining these assets and discourages their installation by councils.
- ◆ There is a need to clarify the use of 'offsets' terminology. 'Offsets' is commonly used to describe the stormwater offset regime overseen by Melbourne Water as well as the regulatory offset program for water corporation sewerage and wastewater assets overseen by the EPA. Since 'regulatory' offsets will increasingly address stormwater issues, clearer terminology is required.

VicWater looks forward to the Advisory Committee's final report and further opportunities to be involved in reforms to stormwater management. Please contact James Cleaver (James.Cleaver@vicwater.org.au) should you have any questions or if you would like to discuss any of the issues raised herein in greater detail.

Yours sincerely



Amanda Smith
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