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CSV Improving Stormwater Management Issues Paper Response

Consulting Surveyors Victoria (CSV) currently represents over 120 member firms that have as principals or employees the clear majority of Licensed Surveyors that produce, lodge for certification and manage the plans of subdivision that create the more than 30,000 titles (including both land and building parcels) that come into existence in Victoria each year. Our members also originate a very significant component of all planning permit applications related to residential development across Victoria. On that basis the Association's members have a distinct interest in any proposals and actions that affect all types of development across the whole of Victoria, with residential development being a major component of our member's involvement in Victoria's growth and vitality. Our members' clients range from the largest of national and international development companies through to a 'mum and dad' individual 'developer', undertaking a once in a lifetime dual occupancy development of their family home. Accordingly, CSV is in a unique position to offer an informed and considered viewpoint in relation to impacts and equity of specific actions and requirements that may be imposed through the Victorian Planning Provisions, such as those potentially envisaged under the Stormwater Management Issues Paper.

Whilst the majority of our metropolitan members are not directly involved in analysis and design of stormwater management matters, they are an integral part of the implementation and documentation of Water Sensitive Urban Design initiatives, particularly in relation to major residential developments in the metropolitan growth areas. On the other hand, many of our regional Victorian members are more directly involved in stormwater management issues in their local areas of operation.

Through these involvements our members are aware of evolving actions and proposals for storm water treatment. We believe many past storm water management actions have been found to be inappropriate in concept or in application to particular locations and/or environments.

We believe the Issues Paper considers experiences, examples and solutions generally based on Melbourne and environs and that we do not believe these should be the



basis of policy implementation across the whole of Victoria, without detailed analysis and evaluation on a catchment and sub-catchment basis.

Based on our members experiences of implementation and management issues of state wide planning controls by under-resourced and relatively inexperienced regional/rural municipal officers, we also have concerns regarding the impact of the apparent micro-site planning controls envisaged in the Issues Paper. We believe such controls, which in our experience quite often lead to unanticipated, unintended and difficult to resolve local issues, also have the potential to add yet another layer of expensive and time consuming “red tape” with little or no environmental or social benefit in many cases.

Our members experiences are that all waterway catchments are unique and that quite different solutions may apply to the ecological needs of those catchments (and sub-catchments).

We believe that stormwater management must also be considered in the context of a balanced and measured response, balancing the needs of all land holdings and existing development and community and public infrastructure, with those of the environmental needs of particular unique waterway environs.

Consulting Surveyors Victoria recognises that stormwater management is a significant environmental and social impact issue that needs effective policy controls, but we believe that any controls that may be introduced need to be based on sound analysis and appropriate evaluation of scientific and engineering solutions for a particular catchment. We also believe any such controls must be fully evaluated for effectiveness and practicality of implementation, in regional areas in particular.