

IMPROVING STORMWATER MANAGEMENT ADVISORY COMMITTEE

COMMENT ON ISSUES PAPER: IMPROVING STORMWATER MANAGEMENT

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Issues Paper: Improving Stormwater Management

Thank you for the opportunity to comment on the Department of Environment, Land, Water and Planning Issues Paper *Improving Stormwater Management*. In this commentary Master Builders Association of Victoria (Master Builders) makes general and non-exhaustive comment on some of the relevant principles for designing stormwater management rules.

We were encouraged by the general consensus at the Stormwater Management workshop of 26 June in Melbourne that greater centralisation of processes between councils was welcomed and to be further explored.

Clause 4 of the Terms of Reference of the Committee references:

"...strengthening the links between urban water management and the planning and development system more broadly."

Master Builders continues to advocate for improvement in centralised planning in Victoria including measures that ensure alignment between existing building and planning rules and associated legislation. The risk of duplication is present when the planning and building processes are developed independently and without reviewing how they function concurrently.

We also note that the Committee asks what (complementary) changes to the building and plumbing regulations, guidance, or any other mechanisms, are needed as part of the reform process. Reviewing the mechanisms or changes needed to building regulations or guidance has merit. It is equally important to consider what provisions are extant in legislation and risk being duplicated. Whole of system efficiency will improve when real or potential overlaps with all legislation are understood, including provisions outside of the strict ambit of planning law.

We also recommend the committee, in consultation with industry technical experts:

- (a) give consideration to what proposed rules might drive up costs to industry and consumers without commensurate benefit; and
- (b) ensure that the operational application of rules (the 'rules in practice') are fully considered to avoid the risk of ineffective or impractical outcomes.

A key risk to manage for any proposed amendments to the planning system is that regulations are appropriate and avoid double handling or red tape. Industry has concerns where increased regulation leads to risks of unnecessary cost being passed on to the consumer.

One example of the potential red tape implications is 32.08-10 application requirements on page 37 of the Draft Stormwater provisions where it is proposed that:

“...construction details of all drainage works, driveways and vehicle parking, loading areas and retention, detention and discharges to the stormwater system...”

are to be provided at the permit stage of the application.

The implications of this proposed change are concerning because the rule would require a full set of engineering drawings to accompany a planning permit application. At the permit stage of the process the conceptual designs should be sufficient because the drainage plans may change if house plans are amended. The cost of providing a full set of engineering drawings so early in the process would increase the overall cost of the process to consumers which we understand can be in the region of \$1600 per application for a typical small dwelling.

The above red tape issue is a good example of where Master Builders can offer expertise to assist in the development of new rules and processes and we welcome the opportunity for partnership going forward. We acknowledge the work of the committee to-date and look forward to being further involved in the process to develop appropriate and workable principles.

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