Issues Paper
Improving Storm Water Management Advisory Committee - May 2018

The Institution of Surveyors Victoria represents over 450 members. Members are located in and around metropolitan Melbourne and across the breadth of rural and regional Victoria. Institution members are at the forefront of the property industry in Victoria, an industry worth billions of dollars annually to the Victorian economy.

Institution of Surveyors members are involved in developments at all scales across Victoria. This includes the large scale broad acre “greenfield” developments on Melbourne’s ever expanding fringes, high rise development adjacent to the CBD, and small “mum and dad” Victorians undertaking building extensions in suburban backyards.

Our members are aware of the considerable current work undertaken on both small and large scale developments to ameliorate storm water and potential downstream effects on other properties and the environment.

Members are also aware of the ever changing “solutions” to storm water treatment. These “solutions” were the result of deliberations by bureaucrats and industry expert opinions at the time much like this current “issues paper”. Many of these past solutions have been found to be “flawed’ and members often have to deal with the legacies of these “flawed solutions”.

The issues paper contains information in regards to “selective examples” of research in small selective areas in and around Melbourne. The findings/conclusions drawn from those selective examples should not be extrapolated across the whole of Victoria in the manner indicated in the paper.

Experience and involvement in research and environmental activities on ecological projects by some of our members and work associates indicates to us that:

All catchments are unique. Sub-reaches of waterway catchments are unique and quite different solutions may apply to the ecological needs of those reaches.

Stormwater management issues should also be considered in line with the unique individual catchment and sub-catchment issues. The issues of “salt” in the irrigation areas require a vastly different treatment than the “nutrient rich” stormwater run off from suburban “off lease” dog parks. Stormwater management must also be considered in the context of a balanced and measured response, balancing the needs of adjoining properties, community and public infrastructure, with those of the environmental needs of particular unique waterway environs.

The Institution acknowledges that there is no current “one size fits all” solution to stormwater management. The solutions lie in detailed spatial analysis and evaluation of the catchments and sub-catchments. Considerable more work is required in this area. Further development is required on both large scale and small lot scale engineering and practical treatments. The Institution understands that large end of catchment solutions are not the answer in many cases.

The issues paper appears to concentrate on capturing need developments, down to the “micro” suburban backyard scale. Retro fitting solutions to our existing urban developments across the state has not been addressed.

Some treatments will require changes to engineering standards, changes to the standards and methodology of evaluating rainfall and run off determinations.

Some treatments may require changes in individual behaviours and actions, mirroring the water savings actions of many consumers during past droughts.
As a “last resort” some matters may require incorporation into the Victorian Planning Provisions (VPP’s) and changes to building regulations. Similarly, some other current legislation should be examined to find better localised solutions for the re-use of storm water, i.e. fire fighting back up tanks, gardens and other.

The current “Issues Paper” appears to be too quick to apply changes to the VPP’s, which will have state-wide impacts. The potential is to add yet another layer of expensive and time consuming “red tape” with little or no environmental or social benefit in many cases.

It is suggested that further research and collaboration with all stakeholders be conducted before state scale Victorian Planning Provisions and other changes are considered.

As a result of the depth and breadth of our knowledge of the property industry and development at all scales across Victoria, our involvement in environmental and ecological development across Victoria over many years, the Institution of Surveyors Victoria is not yet in a position to support the recommendations contained within the current Issues Paper, Improving Storm Water Management, May 2018.

Gary White
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29 June 2018