

STORMWATER

V I C T O R I A



STORMWATER INDUSTRY ASSOCIATION VICTORIA

Melbourne's Water Future – Consultation Draft

Submission on behalf of Stormwater Victoria

September 2013

Introduction

Stormwater Victoria welcomes the development of the Melbourne's Water Future (MWF) and the opportunity to provide comment on the draft strategy.

The development of a comprehensive, long term, integrated 'whole-of-water-cycle' strategy is critical to maintaining and protecting our bays and waterways and enhancing the liveability of metropolitan Melbourne into the future. Stormwater Victoria supports the objectives the strategy with it's strong focus on the development of a long term sustainable, diverse, interconnected and multi-scaled approach to water management. It is especially positive to see stormwater elevated above it's traditional status as the 'poor cousin' to potable and wastewater. This is a timely and necessary step in the realisation of integrated water cycle management and indeed Melbourne's Water Future.

The strategy and underlying themes align well with Stormwater Victoria's position on Water Management. The strategy can be seen to reflect the excellent work of industry practitioners over the past decade and is a positive step in formalising an integrated approach to water management at the State level.

Stormwater Victoria is in a unique position to provide feedback and critical review of the document as the peak body for the stormwater industry, representing a range of stakeholders including, among others - suppliers, consultants, local and state government. Further to this, our role enhancing the capability of the industry through seminars and conferences, our broad reach and understanding of the industry, our role in advocacy and our ability to represent the industry to the wider community will be key to our meaningful contribution to 'Melbourne's Water Future' going forward. Stormwater Victoria looks forward to the challenge of delivering Melbourne's Water Future and is eager to work with it's members, the OLV and other stakeholders in the delivery of Melbourne's Water Future.

Stormwater Victoria views Melbourne's Water Future as a high level document which defines a new direction toward an integrated water management future for Victoria. However, it is recognised that much of the detail is yet to be developed and that firm direction as to when and how the outcomes and objectives of Melbourne's Water Future are delivered remains to be established. The Office of Living Victoria is to be commended on the direction and intent of this strategy. It is a fundamental shift from business as usual approaches and aligns with current best practice.

Key messages

Stormwater Victoria considers the key areas where particular attention needs to be given, both in the strategy's development and implementation, to include the following:

1. Strong collaboration with Stormwater Victoria and the broader industry in the formation and delivery of the strategy;
2. Demonstration through action, ensuring the underlying principles of the strategy flow into key planning projects, both brown and greenfield;
3. Successful alignment of 'Melbourne's Water Future' with the Metropolitan Planning Strategy;
4. Inclusion of Victorian Planning Provisions for IWCM to compliment the development of building controls and local planning scheme WSUD amendments
5. Greater consideration of climate change impacts in the strategy

Role of Industry

Melbourne's Water Future has been developed with a primary focus on the role of the state government stakeholders in the water sector. There is a long and proud history of innovation and excellence across the industry and while this is acknowledged throughout the document, the fundamental importance of the stormwater industry in the delivery of Melbourne's Water Future could be further emphasised. It is the stormwater industry which will ultimately deliver much of Melbourne's Water Future and currently it is the water utilities who feature most prominently in the strategy. For true integration this imbalance needs to be addressed.

3.1 A community engaged in whole-of-water-cycle management

While the concept of a website 'Water Source' could have a range of benefits, care will need to be taken to ensure it does not duplicate or compete with either the Stormwater Industry Association of Victoria or others providing capacity building to the industry such as Clearwater. Stormwater Victoria provides a range of services to the industry including mini-seminars and conferences while Clearwater is also a significant service provider with a very successful track record. The niche Stormwater Victoria and Clearwater fill must be recognised and protected. Therefore, the focus of a new website should be clearly tailored toward the community and not industry.

3.2 Suburbs – old and new – designed with water in mind

Stormwater Victoria supports the initiative to develop metropolitan, regional and local water cycle plans. Whole-of-water-cycle planning at all city scales will provide consistency and recognise the interconnectedness of the system. These plans must go beyond the work of the water utilities with equal attention also shown within the plans to the role of stormwater. The MIWCS need to be developed according to a clear framework and this should be developed in close consultation with the industry.

3.2.3: Incorporating integrated water cycle management into growth area planning

Stormwater Victoria welcomes the commitment made by the Office of Living Victoria to work with the Growth Areas Authority and other relevant authorities to embed IWCM into precinct structure plans. There is significant opportunity for integrated water cycle management when it is planned in from the beginning. The economies of scale, the availability of dedicated space and the ability to design in and innovate are opportunities presented by early inclusion of IWCM in growth area planning. Setting up processes to make sure stormwater is considered fully during structure planning will enhance the opportunity for multiple benefits to be accrued and will benefit both the industry and the community.

Initiative 3.2.5: Improving stormwater management in new developments

Stormwater Victoria views the development of unambiguous Planning Provisions which provide performance based criteria as very important. The industry has suffered due to lack of consistency in approach across jurisdictions and the lack of a clear policy framework for the delivery of BPEM. The outcomes from the Clause 56.07 review should facilitate amendments to broaden it's application. Planning Provisions should also be developed to cater for the significant range of development where subdivision does not occur. Building regulations which deal not only with water efficiency but also water quality and quantity management would also be welcome. By developing a comprehensive suite of policy and building regulations the current ambiguity will be removed and implementation will be significantly improved. This also needs to be supported by capacity building work so that councils are able to implement the policies in a consistent manner through the planning assessment process and to assist

developers in understanding the benefits and technical imperatives when constructing IWCM infrastructure.

3.2.6: Reduce urban flooding

For many years flood management has been dealt with in isolation of other areas of the water cycle such as water quality management, alternative water sourcing etc. There is significant opportunity to review business as usual approaches and to integrate flood management planning more comprehensively into IWCM planning. Approaches which retain water close to source can have positive impacts, especially on minor flooding. More work needs to be undertaken in this area to quantify the benefits and to provide clear guidance around design. These approaches also need to be backed up through appropriate policy.

3.2.7: Influence design guidelines for stormwater quality and flooding

Stormwater Victoria is in a strong position to provide industry feedback on guidelines such as AR&R and ARQ and would welcome the opportunity to work with the OLV in formulating Victoria's position in relation to their review and updating.

3.3.7: Establish regulatory support for local water use

Changes in building regulations could have great benefit to a range IWCM measures. For example, the current anomaly where water can be traded against energy (solar hot water vs rainwater tank) is poor policy. It is inappropriate to be able to choose energy saving options at the expense of water management and vice versa. Minimum standards should be developed for water efficiency, water quality and volumetric discharge which can't be traded. The role of a water tank goes beyond simply providing water efficiency gains to providing significant water quality and quantity benefits.

It is important that the work on a regulatory impact statement (RIS) identifies the wide range of benefits which stormwater management can deliver and that these are fed into the decision pathways determining which technologies are incentivised through the building regulations. Multi-benefit technologies should be prioritised over single benefit technologies.

Resilient water systems

New funding models which include co-investment in water infrastructure are necessary such as described in Initiative 3.4.1: Invest in and fast-track projects that enhance water system resilience. There is a real need to work on the underpinning economics of such an approach and to develop robust data to address the so-called intangible benefits such as liveability, improved health and wellbeing and, the environmental benefits associated with IWCM. Once a robust approach has been established a key aspect of this strategy should be to establish a framework for assigning financial responsibility according to who benefits. For too long the stormwater industry has had to bear the cost of infrastructure which provides ever more complex services. There are a range of benefits which are more closely related to health and wellbeing for example, or biodiversity protection and new models for cost sharing need to be established so that costs are more equitably shared with who benefits.

Stormwater Victoria supports a review the licensing and trading arrangements of urban water as described in initiative 3.4.8: Improve investment certainty and the efficient allocation of urban water. Licensing stormwater can achieve a range of outcomes including: ecological outcomes (ensuring appropriate allocation), security of access (improved investment decisions) and whole of system accounting (understanding the complete water balance). Trading arrangements can enable new projects to become viable by introducing additional end users and therefore improving the business case of an initiative.

There are however a range of complexities in licensing stormwater, none the least, relating to the significant level of investment already sunk in stormwater assets and the multi-benefit role these assets have. While Stormwater Victoria supports review in this space there is concern in the sector that this could lead to a loss of access for local government in particular and this could have perverse outcomes. Particular attention will need to be given to a licensing regime which enables a broader uptake of stormwater harvesting opportunities in an equitable way.

3.4.10: Address knowledge gaps and other barriers to improved water system resilience

Stormwater Victoria can provide unique perspectives into the knowledge gaps and barriers faced by those trying to implement IWCM and it would therefore be of benefit to involve Stormwater Victoria in this review.

3.5 Improved natural waterways

Improved natural waterways are an essential component of this strategy. Given the importance protecting and enhancing our urban waterways Stormwater Victoria is of the opinion that a vision for our waterways should be established in order to set the bar and benchmark progress.

Adapting to climate change

There is limited direct discussion of climate change and adaptation strategies in Melbourne's Water Future. It has been limited mainly to the case study of the Victorian Climate Change Adaptation Plan. Climate change should be addressed more broadly and directly as the timeframes of the strategy are such that climate change impacts will impact on the implementation of the strategy. Adapting to climate change should be brought in as an initiative in it's own right, given it's significance to IWCM.

Planning for a future beyond the OLV

The Office of Living Victoria was called into existence as an initiator of change, a catalyst agency to turn the corner on a new era of water management in the State but, with a limited lifespan of three years. One factor of concern within Melbourne's Water Future lies with the responsibilities sitting with the OLV throughout the document. This work as a bridge builder between stakeholders, a policy developer and much more will take more than the next two years to complete. This raises two points, firstly, the OLV needs a longer lifespan and secondly, as a long term strategy, Melbourne's Water Future should consider the transition beyond the OLV and discuss who will provide this very important role into the future.

Conclusion

Stormwater Victoria acknowledges the significance of Melbourne's Water Future. The document builds on the years of leading edge work that has occurred in Victoria and beyond and for the first time delivers a government framework for integrated water cycle management.

There are a number of opportunities to tighten and otherwise improve the strategy. These include:

1. Strong collaboration with Stormwater Victoria and the broader industry in the formation and delivery of the strategy;
2. Demonstration through action, ensuring the underlying principles of the strategy flow into key planning projects, both brown and greenfield;
3. Successful alignment of 'Melbourne's Water Future' with the Metropolitan Planning Strategy;
4. Inclusion of Victorian Planning Provisions for IWCM to compliment the development of building controls and local planning scheme WSUD amendments
5. Greater consideration of climate change impacts in the strategy

Stormwater Victoria has worked hard, over many years, to improve the stormwater industry and represent its members. Melbourne's Water Future provides an opportunity to take the next step in Victoria and Stormwater Victoria is eager to continue working with the Office of Living Victoria in the development and implementation of this strategy.