

12 March 2015

Mr Andrew Wall
Director – Network Policy and Standards
VicRoads
60 Denmark Street
KEW VIC 3101

Dear Mr Wall

Re: Code of Practice for Management of Infrastructure in the Road Reserve

Thank you for the opportunity to provide comment on the draft Code of Practice for Management of Infrastructure in the Road Reserve. VicWater is the peak body of the Victorian Water Industry with its membership constituted of Victoria's 19 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.

This VicWater submission is based on detailed input from a number of rural, regional and metropolitan water corporations.

Clause	Comment/feedback
Page 9 – The Code of Practice Framework	The diagram should be amended to include the provisions for emergency works.
Clause 4 - Objectives of the Code	Objective (f) should be amended to acknowledge the need for notification by road authorities to utilities regarding road works which may affect utility assets.
Clause 10 (2)	Where the draft code references “Individual” road authorities, suggest the word individual be replaced by “all”.
Clause 11 – Early consultation	Planning and design proposals agreed during early consultation should be binding as much as reasonably practicable, noting the costs and delays associated with reworking plans later during construction.
Clause 17 (2) – Positioning	A definition of what constitutes a greenfield site versus and brownfield site is necessary. The text “aided where applicable” should read “aided where practical”.
Clause 20 (b) – note	This should be identified in a works program or similar

Clause	Comment/feedback
Clause 22 – Disruption to effective and efficient delivery of utilities services	Should require road authorities to consider impacts on utility services during the construction and design of roads.
Clause 24 (3) – Depth of underground non-road infrastructure	<p>Suggest add the following text: “decisions to install infrastructure at depths greater than those specified in Appendix 1 should be taken at the utility’s discretion, not the road authority’s.”</p> <p>(note ii) last sentence “in recognising.... are planned”. This sentence should be deleted. It is an opinion.</p>
Clause 26 – Attachment of non-road infrastructure to bridges etc	<p>Suggest add the following text: “Any infrastructure to be attached to bridges shall be designed so as not to impinge the eventual replacement of the bridge.”</p>
Clause 29 – Changes to road level or profile	Road authorities should be responsible for raising manholes and valve covers to the surface when they make changes to road level or profile.
Clause 35 (2) (d) (iv) – Applications for consent	Suggest deleting this text. Construction drawings are typically prepared after receiving consent.
Clause 36 (2) – Road authority response to applications for consent	<p>Suggest add the following text: “The coordinating road authority shall notify all impacted utilities or provider of public transport of the application for consent.”</p>
Clause 36 (5)	<p>Suggest the following text: “The coordinating road authority, in considering applications for consent, should impose such conditions as are necessary to give effect to the “works and infrastructure management principles” as included in section 20(2) of the Act. Where an application for consent indicates that the proposed utility works could affect public transport infrastructure or services <u>affects public transport infrastructure or services as indicated by the utilities or provider of public transport (notification)</u>, the coordinating road authority should <u>shall</u> include reasonable conditions...”</p>
Clause 36 (8)	Clause 16(5) of Schedule 7 of the Act continues to cause dispute among utilities and road authorities. The Code should take the opportunity to provide greater clarity with regard to what constitutes legitimate grounds to refuse consent.
Clause 39 – Post-notification of works	<p>Suggest add the following text: “The coordinating road authority shall forward this notice to all other impacted utilities or provider of public transport.”</p>

Clause	Comment/feedback
Clause 44 – Notification of works affecting tram and bus services	<p>The consent process once applied allows public transport companies to apply any conditions whatsoever to the consent process. Under the Regulation “Part 3 - Consents” there are certain conditions that coordinating road authorities cannot impose on consents. This process however does not apply any restrictions to public transport companies, nor does it allow for any process to object, nor have a process for the concerns to be mediated. Any acceptance of this process must be done on the basis of that boundaries are placed around conditions set by public transport companies.</p> <p>The definitions included in this clause (including ‘notes’ on page 35) should be placed in the interpretation section on page 13.</p>
Claude 48 (3) – General	<p>Common service level agreements should also set out a framework for considering the trade-off between initial installation costs verses potential future asset conflicts in decisions on the alignment of large utility assets.</p>
Clause 56 (1) – Reinstatement works	<p>The addition of the term ‘reasonably practical’ is welcome.</p> <p>Water corporations would welcome the development of common regionally-based reinstatement standards under the guidance of VicRoads.</p>
Clause 67 (3) – Record of the location of non-road infrastructure	<p>Suggest replacing “should” with “must”.</p>
Clause 68 & 70 – Location of underground infrastructure	<p>The Code should specify who bears the cost of asset proving.</p>
Appendix 1 Clause 3 (b) Street trees	<p>(third dot point) Tree location and species type should be determined <u>in collaboration with utilities or provider of public transport</u> based on the specific site and the ability of the tree to both enhance local amenity and co-exist with utility services infrastructure – with all trees to be identified on a master services plan.</p>
Table A1	<p>Suggest restating clearances between utility infrastructure as “minimum clearances”.</p> <p>The tables in this section require a thorough review and consolidation to correct numerous errors, inconsistencies and reduce confusion (see attached for examples).</p> <p>Where a conflict exists, greater separation distance should apply.</p> <p>(Note 1) Refer to the Melbourne Retail Water Agencies (MRWA) Water Supply Standard Drawing: <u>MRWA-W-2002</u>.</p>

Clause	Comment/feedback																												
Table A2	<p>This table does not reflect the minimum depth under different road classes. Water Supply Code MRWA Edition, Version 1.0, WSA 03-2002-2.3 The Code specifies the following:</p> <table border="1" data-bbox="616 400 1442 660"> <thead> <tr> <th>Location</th> <th>Minimum Cover (mm)</th> </tr> </thead> <tbody> <tr> <td>Non Roadways</td> <td></td> </tr> <tr> <td>• General</td> <td>450</td> </tr> <tr> <td>• Industrial/Commercial</td> <td>600</td> </tr> <tr> <td>Sealed Roads</td> <td>600</td> </tr> <tr> <td>Major Roads/Embankments</td> <td>750</td> </tr> <tr> <td>Freeways</td> <td>1200</td> </tr> </tbody> </table> <p>Minimum requirements from the <i>manufacturer</i> (PVC and PE is same)</p> <table border="1" data-bbox="616 763 1442 1023"> <thead> <tr> <th>Location</th> <th>Minimum Cover (mm)</th> </tr> </thead> <tbody> <tr> <td>No Vehicular Loading</td> <td>300</td> </tr> <tr> <td>Non Roadways</td> <td>450</td> </tr> <tr> <td>Sealed Roads</td> <td>600</td> </tr> <tr> <td>Unsealed Roads</td> <td>750</td> </tr> <tr> <td>Embankments</td> <td>750</td> </tr> <tr> <td>Construction Equipment Loading</td> <td>750</td> </tr> </tbody> </table>	Location	Minimum Cover (mm)	Non Roadways		• General	450	• Industrial/Commercial	600	Sealed Roads	600	Major Roads/Embankments	750	Freeways	1200	Location	Minimum Cover (mm)	No Vehicular Loading	300	Non Roadways	450	Sealed Roads	600	Unsealed Roads	750	Embankments	750	Construction Equipment Loading	750
Location	Minimum Cover (mm)																												
Non Roadways																													
• General	450																												
• Industrial/Commercial	600																												
Sealed Roads	600																												
Major Roads/Embankments	750																												
Freeways	1200																												
Location	Minimum Cover (mm)																												
No Vehicular Loading	300																												
Non Roadways	450																												
Sealed Roads	600																												
Unsealed Roads	750																												
Embankments	750																												
Construction Equipment Loading	750																												
Figures 1 though 7	<p>Noting the significant damage to utility assets caused by inappropriate species or location of trees within the road reserve, the Code should include specific standards relating to tree selection and location.</p> <p>Suggest switching the recommended alignment of water mains and raw water main in Figure 1 (i.e. water main 2.6 m off the boundary and the raw water main 3.1 m off the boundary). In areas without purple pipe schemes this change will move the water infrastructure away from the tree zone and improve access.</p> <p>Sewer location: Whilst water corporations' preference is for the reticulated sewer to be located at the rear of the title it might be necessary in some cases to place pipes in the road reserve. In those cases the location would be acceptable.</p>																												

VicWater would welcome further opportunities to assist VicRoads with its engagement with water corporations on this draft Code. Please direct any correspondence to James Cleaver (james.cleaver@vicwater.org.au or (03) 9639 8868).

Yours sincerely



Tony Wright
Chief Executive Officer

ATTACHMENT A

TABLE A1: CLEARANCES BETWEEN UTILITY INFRASTRUCTURE

Networks (VEDN)

Transmission	Gas					Water			
	Gas Asset < 50 mm		Gas Asset > 50 mm			Water Main < 300 mm		Water Main > 300 mm	
Vertical Clearance	Horizontal Clearance	Vertical Clearance	Horizontal Clearance	Vertical Clearance	Horizontal Clearance	Vertical Clearance	Horizontal Clearance	Vertical Clearance	Horizontal Clearance
1000 mm	300 mm	150 mm	500 mm	150 mm	500 mm	300 mm	500 mm	300 mm	300 mm
1000 mm	300 mm	150 mm	500 mm	150 mm	500 mm	300 mm	500 mm	300 mm	300 mm

generally to be placed to the road side of LV cables within the electricity zone and with clearances as above unless otherwise agreed with the electricity infrastructure manager.

g. NBN)

Gas	Water		Sewer		Electricity	
110 mm or Less	High Pressure / Capacity	Local Reticulation	Main	Connection Pipe	High Voltage	Low Voltage
Radial Clearance	Radial Clearance	Radial Clearance	Radial Clearance	Radial Clearance	Radial Clearance	Radial Clearance
150 mm	300 mm	150 mm	300 mm	150 mm	300 mm	100 mm

Clearance	Water				Sewer		Electricity		Stormwater	
	Water Mains ≤DN 375		Water Mains >DN 375		Sewers - Gravity		Conduits & Cables		Stormwater Drains	
Clearance	Horiz. Clearance	Vert. Clearance	Horiz. Clearance	Vert. Clearance	Horiz. Clearance	Vert. Clearance	Horiz. Clearance	Vert. Clearance	Horiz. Clearance	Vert. Clearance
1000 mm	Refer Note 1	150 mm	Refer Note 1	300 mm	1000/600 mm	500 mm	500 mm	225 mm	300 mm	150 mm
1000 mm	Refer Note 1	150 mm	Refer Note 1	300 mm	1000/600 mm	500 mm	1000 mm	225 mm	600 mm	150 mm

Water Agencies (MRWA) Water Supply Standard Drawing: MRWA-W-202.