

22nd June 2018



CITY OF MELBOURNE

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SEPP Water Review Committee

By email C/O

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Dear Review Committee,

**SUBMISSION TO THE STATE ENVIRONMENT PROTECTION POLICY
(WATERS) REVIEW**

City of Melbourne is pleased to provide an officer submission to the State Environment Protection Policy (Waters) Review being undertaken by Department of Environment, Land, Water and Planning (DELWP) and the Environment Protection Authority (EPA).

Background

The City of Melbourne (CoM) practices integrated water management. CoM defines it as the coordinated management of all components of the water cycle including water consumption, rainwater, stormwater, wastewater and groundwater, to secure a range of benefits for the wider catchment. Our actions are guided by our strategic water framework Total Watermark: City as a Catchment.

This strategy has been revised to keep pace with the change in practice and theory within the water industry. For example, our 2008 strategy was written towards the end of the millennium drought and had a strong water conservation focus. Our 2014 update includes a greater emphasis on flood mitigation, water quality outcomes and climate adaptation. In 2017, CoM adopted a Municipal Integrated Water Management (IWM) Plan that provides guidance for the development of place-based implementation plans. It updates the detailed four year implementation program for Total Watermark prepared in 2014 and aims to guide our investment and thinking for the next 10 years.

Over the last decade the City of Melbourne has invested over \$35 million dollars in stormwater harvesting and water sensitive urban design projects. CoM has strong stormwater quality and alternative water source targets. Our targets are reinforced in several of our policy documents that sit alongside Total Watermark; including the Urban Forest Strategy, the Open Space Strategy, the Climate Change Adaptation Strategy and in our structure plans for the urban growth areas of Southbank, City North, West Melbourne and Macaulay.

The State Environment Protection Policies (SEPP) have been identified in CoM's Municipal IWM Plan as a key policy influence and our major stakeholder interest with the Environmental Protection Authority (EPA). CoM's strategic targets and investment has been guided by the Victorian Planning Provision Clause 56.07.4, by the Best Practice Environmental Management Guidelines (BEPMG) – Urban Stormwater as well as other environmental and social drivers such as the millennium drought.

Response

CoM does not intend to make a full submission to the Review but instead to support the submission presented by the Municipal Association of Victoria (MAV). The CoM submission specifically responds to **Clause 34 – Urban Stormwater**, responding to Question 8 of the online form below.

8. Do you have specific comments on clauses 32-42 of the Draft SEPP (Waters), including the explanatory notes? Is there sufficient clarity of rules and obligations to enable implementation?

CoM has been working collaboratively across council and authorities boundary for many years as we see this as the most effective way of managing the water cycle. Water 'knows no boundaries' within a catchment and no one authority has responsibility for the entire water cycle. Our location at the base of catchments including the Yarra River, Moonee Ponds creek and Maribyrnong River results in us inheriting upstream stormwater treatment or lack there-of.

We consider the following are critical to urban stormwater outcomes and the wellbeing of our community in the City of Melbourne:

- Collaboration at the catchment scale, such as the IWM forums should be maintained.
- A consistent, sustainable funding model separate from council rates should be established to provide consistent, ongoing capital and operational investment for stormwater treatment improvement and ensuring systems are maintained in optimal performance standards. This is consistent with CoM's Municipal IWM Plan Action 6.2.6.
- The Urban stormwater BEMPG should be extended to virtually all developments including industrial – this would share the burden for improving environmental outcomes more broadly. This is consistent with CoM's Municipal IWM Plan Action 6.1.1.
- Introducing planning requirements for BEPMG down to smaller scales of development in all locations, to maximise catchment benefit consistent with the Melbourne Planning Scheme Clause 22.23. Further, to assist with implementation of policy an urgent upgrade or further development of a simple to use assessment tool such as STORM is required.
- Increased protection to ensure that saline groundwater derived from basement pump-out water does not impact council stormwater networks – highly saline water impacts surface water ecology, asset life, stormwater harvesting potential and in worst case situations could result in the transfer of dangerous contaminants to surface waters.

- VicRoads, Victrack and others who have responsibility for significant stormwater assets should also carry an equitable level of responsibility for stormwater alongside local government.
- Exploration of options to improve compliance with SEPP to ensure it effectiveness in protecting the key assets of Victoria's waterways and bays.

Thank you for the opportunity to provide a submission to the State Environment Protection Policy (Waters) Review.

For further information about any of the information provided here, please contact our Water Sensitive Urban Design Coordinators, [REDACTED].

Yours sincerely,

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CoM reference DM# 11729891