



13 February 2017

Department of Environment, Land, Water and Planning  
PO Box 500  
Melbourne VIC 8002

Ask for: Kathleen McClusky  
Phone: 9932 1004  
Our Ref: A2567332

To whom it may concern

**Port Phillip Bay Environmental Management Plan 2017 – 2027**

Thank you for the opportunity to provide comment on the draft Port Phillip Bay Environmental Management Plan which is required to be prepared under the State Environment Protection Policy (Waters of Victoria) – Schedule F6 Waters of Port Phillip Bay (1997).

Hobsons Bay City Council acknowledges the many challenges to the management of Port Phillip Bay and welcomes a coordinated approach that seeks to conserve and enhance the health of the state's marine and coastal environments. Council's Living Hobsons Bay: an Integrated Water Management Plan 2014 -19 provides a strategic approach to Council's water management activities and one of its priorities is protecting waterways and the bay from key pollutants.

Council welcomes any additional opportunity to provide further input into the development of the Port Phillip Bay Environmental Management Plan. If you would like to discuss this submission further, please contact Kathleen McClusky, Director, Strategic Development on 9932 1004 or email: [kmclusky@hobsonsbay.vic.gov.au](mailto:kmclusky@hobsonsbay.vic.gov.au) .

Yours sincerely

A handwritten signature in black ink, appearing to read 'Chris Eddy', written over a light grey horizontal line.

Chris Eddy  
**Chief Executive Officer**



## **Hobsons Bay City Council Submission to the Port Phillip Environmental Management Plan 2017 – 2027**

Hobsons Bay is situated on the western shoreline of Port Phillip Bay, approximately seven to 20 kilometres south west of Melbourne's Central Business District (CBD). The community has told Council through a range of strategic planning and community engagement processes that they value Hobsons Bay for its foreshore, beaches, waterways and natural open spaces.

Council's Integrated Water Management Plan 2014 -19 recognises the impact of stormwater quality on the health of the bay and our local beaches. It recognises that improving the quality of stormwater is beneficial for public health. As such there is in principle support for actions that improve the quality of stormwater however, further clarification is sought around a number of these actions.

### Submissions from Regional Bodies

The recommendations as detailed in the Port Phillip Environmental Management Plan 2017-27 (the Plan) are strongly endorsed as is the submission provided by the Association of Bayside Municipalities (ABM), which comprises the 10 councils with frontage to Port Phillip Bay. The submission from the Municipal Association of Victoria (MAV) is also strongly supported, particularly its concern for the number of actions identified in the management plan that will require a response from councils up-stream of the various waterways that feed into the bay. Implementation of these actions will have significant resourcing consequences for councils and this will need to be addressed.

### Vision and goals

The vision for the Plan '*a healthy Port Phillip Bay that is valued and cared for by all Victorians*' is supported along with the following goals:

- stewardship of the Bay is fostered across community, industry and government
- health and community enjoyment of the Bay is enhanced by best practice water quality management
- the Bay's habitats and marine life are thriving

These three goals reflect Council's commitment outlined in our Community Health and Wellbeing Plan 2013-2017 to enhance partnerships between government, community and industry as well as considering the outcome of decision making on the health of our community.



### Actions

The listing of 'actions' is deemed an acceptable approach to deliver the Plan, however, further clarification is needed to determine how these actions will be resourced and how agencies will work together to achieve the outcomes. It is noted that a number of actions will have resourcing implications for Council. Council's capacity to deliver them will need to be carefully considered along with the assumptions underpinning specific actions. We support and refer you to the Association of Bayside Municipalities' submission regarding the 'Feedback on Priority Actions'. Additional comments on key actions are provided below:

#### Action 5.3

There is support for improved monitoring and reporting to better detect health risks. As the responsible authority for environmental protection Council would like to see the EPA take a lead role in this area with support from Melbourne Water as the waterway manager. It is recognised that, as a drainage manager, Council has a role to play in collaborating with the EPA to trace sources of pollutants entering the stormwater system. However, as this is an environmental compliance issue the EPA and not Council is the responsible authority in this area.

#### Action 3.3

There is in principle support for ensuring all urban and rural land use effectively controls impacts from stormwater and runoff, and that controls are in place to manage increases in loads. However, it is not clearly identified in the Plan how this can practically be achieved. Further clarification is required to ensure that all stakeholders have a clear understanding of what this commitment entails and that it can be practically achieved. The following observations are made:

- if this action is focussed on improving compliance and ensuring that there are no illegal discharges into the stormwater then there is support for the EPA to increase its activities in this area
- if this action is about ensuring all new developments meet or exceed the minimum requirements set out in the Urban Stormwater Best Practice Environmental Management Guidelines then there is support for strengthening the legislative framework in the Victorian Planning Provisions to enable this to take place
- if this action is about ensuring all existing developments meet the minimum requirements set out in the Urban Stormwater Best Practice Environmental Management Guidelines then we question whether this is possible. A number of issues will require further consideration, such as heritage overlays in the Planning Scheme and the cost of retrofitting existing infrastructure