



13 January 2017

Water Planning Project Team
Water and Catchments Group
Department of Environment, Land, Water and Planning
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To Whom It May Concern

Draft Integrated Water Management Framework for Victoria

Hobsons Bay City Council welcomes the opportunity to contribute to the development of the Integrated Water Management Framework for Victoria. Council has a strong commitment to water management, which is demonstrated through our Integrated Water Management Plan 2014-19 and is identified as a key priority area in our Advocacy Strategy 2014-18.

The overall direction of the draft Framework is supported. In particular Council supports a commitment to cross organisational collaboration that provides water services to the community at the best possible value.

We welcome any additional opportunities for feedback on the draft Framework. Should you wish to discuss the submission further please contact Kathleen McClusky, Manager Strategy and Advocacy on 9932 1004 or email kmccclusky@hobsonsbay.vic.gov.au.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Tammi Rose'.

Tammi Rose
Acting Chief Executive Officer



Hobsons Bay City Council Submission to the draft Integrated Water Management Framework for Victoria

Hobsons Bay City Council has an important role in managing water sustainability due to the large areas of land and extensive stormwater drainage network it manages, its role in land use planning, and its close relationship with the local community. By using an integrated water management approach Hobsons Bay City Council plans to achieve a greener, healthier, more sustainable community.

The Living Hobsons Bay: an Integrated Water Management Plan 2014-18 is a key strategic document to guide Council's water management activities. As what we do in one part of the water cycle impacts on another, we need to obtain the most out of our water. Council is working to include water in all aspects of our planning processes. When we plan to manage water supplies, wastewater treatment and stormwater runoff while protecting the health of our natural environment, we achieve integrated water management.

The Draft Integrated Water Management Framework for Victoria

The general direction of the draft Framework is supported, particularly the importance of collaboration between agencies which is critical to achieving Integrated Water Management (IWM) outcomes. Strong linkages are required between water planning and other processes to enhance outcomes such as liveability, land use, transport and economic development.

While the draft Framework proposes a strong foundation for collaborative Integrated Water Management (IWM) planning there are a few areas that require further strengthening. They include: consideration of the balance between managerial and technical expertise within the proposed IWM Forums, how to strengthen collaboration between the water and land use planning sectors, and what financial resources will be available for the long term management of IWM infrastructure.

The goal of implementing, "IWM solutions that provide multiple water services at best community value, irrespective of institutional structures" is supported.

Strategic Directions Statement

The proposed collaborative process for developing strategic directions statements to inform IWM planning in each catchment is supported. The importance of engaging with local communities when setting strategic priorities and the commitment, within the draft Framework, to engage with local communities is welcomed.



As priorities will vary across the length of each catchment, it is important to consider the range of priorities and the impacts of planning decisions on local communities. Hobsons Bay is a coastal Council. Our local community will be impacted should there be poorly managed runoff from upstream developments. It will also be impacted by sea level rise and its impact on the hydrology of waterways and drainage infrastructure. The scope of IWM forums and their planning must be broad enough to consider all relevant impacts to the community including those unique to specific areas.

The commitment made on page 18 of the draft Framework to consider the 50 year planning horizon and any projected changes in population growth, climate change and community preferences when undertaking IWM planning is strongly supported.

IWM Forums

There have been many strong test cases over recent years where multiple agencies have collaborated and partnered with each other to deliver integrated water management projects that have significant community benefits. There is general support to extend these activities beyond individual projects and into integrated regional planning for water management. However, there are several aspects that need further consideration to ensure that this collaborative approach is effective and this includes:

Structure of the IWM Forums

On page 26 of the draft Framework it is suggested that the Forums be made up of a chief executive / managing director or director / general manager and a manager responsible for IWM plans. This suggests that the emphasis will be on multiple levels of management which may be a risk resulting in a top heavy structure without any specialist technical expertise to provide input.

The strength of collaborations that have taken place to date come largely from each organisation empowering experts in IWM to plan and work collaboratively. To ensure effective regional collaboration it is important to build on this and ensure a balance between achieving appropriate governance arrangements and practical implementation outcomes. This balance requires the support of an individual in a senior management position to ensure that each organisation is able to contribute with authority to the discussions and decisions making processes as identified in the draft Framework. It is also likely to require an IWM expert from each organisation who has a strong foundation in the community and organisational drivers for IWM and a strong background in the planning and delivery of IWM projects, including knowledge of past and current hurdles to be addressed. Utilising



these two skill sets in the most effective manner will have a significant influence on the long term success of the collaboration.

A structure that is successfully utilised in the public sector and is likely to be effective in the IWM Forum setting is to establish both a working group and a steering group. The working group could lead the development of IWM plans and analyse opportunities which would then be presented to the steering group for sign off. The steering group would be responsible for championing the works in their own organisations. It will be important to have a strong communication flow between the working and steering groups.

Department Environment Land Water and Planning (DELWP's) role and administrative support

It is important for DELWP to be represented at the IWM Forums and to ensure that DELWP programs and services align with IWM plans.

On page 27 of the draft Framework it is suggested that DELWP will provide a staff member in an administrative support role to the chair for the first one to four years of the IWM Forum's life. It is then suggested that DELWP will step back and pass this role onto the IWM Forum participants. This raises several questions including what is DELWP's ongoing role and commitment to the IWM Forums? It also raises the question of how will this position be resourced once DELWP pulls out? It is extremely unlikely that local governments will be able to resource such a role as we have resourcing issues. Is DELWP able to or should DELWP resource this role across the regions? Within the Melbourne metropolitan area is Melbourne Water better placed to resource this role given the substantial work they have done over the past 15 years to build capacity for IWM? Either way there is a need for a clear and ongoing commitment to be confirmed at the outset.

Collaboration and Land Use Planning

The principle of incorporating IWM planning into new developments as outlined on page 22 of the draft Framework is supported. However, to achieve this it is essential to have sufficient tools within the planning system to enforce the agreed level of service. Council, as the responsible and planning authority for administering the state planning provisions, cannot enforce a decision to embed IWM into a new development unless the legislative framework exists to support such actions.

Community feedback to Victorian government departments, agencies and to local governments continuously states that the community values green spaces, high quality waterways and wetlands. Evidence from estate developments (the recently released Aquarevo estate in Lyndhurst was identified by the CRC for Water Sensitive Cities as



having exceptionally strong sales figures) indicates the importance of good IWM. For governments and their agencies to effectively deliver on community demands for blue/green infrastructure and liveable cities there needs to be strong collaboration between the water and the land use sectors.

It is also noted that while a representative of DELWP's Water and Catchments division is listed as a primary participant no mention has been made of a representative from DELWP's planning division. Further consideration needs to be given to the addition of a representative that provides a land use planning perspective so that IWM becomes business as usual for all developments in Victoria. Further consideration is required from both the water sector and the land use planning sector to make this transition feasible.

Funding IWM

Council has provided feedback on previous occasions about the need for Councils to remain independent and to maintain and manage their own budgets in line with community priorities and resources. It is acknowledged that this has been included on page 22 of the draft Framework with the statement, "IWM Plans will be implemented through existing processes at individual organisations, such as board-approved business case development and implementation plans."

While some money for IWM will inevitably come from the existing organisational budgets of collaborating organisations it is recognised that delivering IWM outcomes, on scale and across Victoria, will require substantial funding. Not all of this funding can be met through existing budgets. With rate capping, local governments in particular are limited in their capacity to find additional resources to support such a transition.

Our understanding is that consideration is being given to utilising the Environmental Contribution charge to support the transition to IWM cities. This proposal is strongly supported and we would like to see a firm and ongoing commitment to utilising this fund for IWM. When considering how such a fund should be utilised to support IWM it is very important to consider the long term and ongoing operation, maintenance and renewal of IWM infrastructure and how its management will be financed. When building a water treatment plant or a wastewater treatment plant we budget and plan for the ongoing operation, maintenance and renewal of the asset. Doing the same for IWM infrastructure must become business as usual for IWM to be successful.



Cost allocation frameworks

Figure 11 identifies an economic and cost allocation process for local IWM planning. The process of identifying accountabilities and desired outcomes before analysing the integrated service options is supported. However, to date implementation has had a large focus on putting capital works in the ground. The described process should be strengthened by the formal recognition of a structure for the long term management of the asset once it is built. It would also be strengthened through the inclusion of a monitoring and evaluation process to enable continuous improvement.

Page 30 of the draft Framework mentions a cost allocation framework developed by DELWP with the water sector. Council is not familiar with this cost allocation framework. While the cost allocation framework may well serve as a good starting point it is likely that such a framework will need to grow and evolve as the IWM Forums learn and refine their techniques for delivering IWM solutions. Any cost allocation framework should be agreed to by the IWM Forum.

