



IMAGINE
THE YARRA

DRAFT YARRA STRATEGIC PLAN

PUBLIC CONSULTATION

SUBMISSION COVER SHEET

Submission Number:	215015
Name (Individual/Organisation):	Yarra Valley Water
Attachments:	Attachment 1 – Written submission

27th March 2020

Yarra Strategic Plan
Melbourne Water
990 La Trobe St,
Docklands VIC 3008

Dear Yarra Strategic Plan Team,

Thank you for the opportunity to respond to the draft Yarra Strategic Plan. Yarra Valley Water (YVW) strongly supports the creation of the plan and believes the plan will be fundamental to protecting and enhancing the Yarra River catchment going forward.

Please find a copy of Yarra Valley Water's submission attached.

If you would like to discuss any of the elements of our submission, please contact [REDACTED]

Yours sincerely,

[REDACTED]

Yarra Valley Water's Submission to the Yarra Strategic Plan

YVW believes a bold and inspiring Yarra Strategic Plan (YSP) is required to ensure protection and enhancement of the Yarra River catchment now and in the future.

We propose the Yarra Strategic Plan should address the following:

- There is a significant opportunity for broader engagement with other Traditional Custodian groups and Aboriginal and Torres Strait Islander Victorians who share the cultural values of the Birrarung.
- Yarra Valley Water should be included in the plan as a collaboration partner with respect to the action to improve the management of septic tanks and wastewater management.
- Further utilising Integrated Water Management (IWM) practices and pathways would be beneficial to providing a more holistic view of the catchment and its water cycle elements and would integrate to stormwater considerations.
- We believe that some of the community vision, IWM opportunities and achievement of Healthy Waterways Strategy targets may only be met with catchment scale considerations.

YVW has a Place-Based Planning Division that looks at integrated water solutions by waterway sub-catchment. This work is completed in partnership with Traditional Owners, Councils, other authorities/stakeholders and the community. Considering the significant overlap of our work with the outcomes of the YSP, YVW would be delighted to engage with government to further to explore the opportunities and barriers outlined in this submission. Further detail on the above and some other considerations are provided below.

Part 1: Working toward the Community Vision

Opportunities for the plan to realise a 50 Year Community Vision

There is a significant opportunity to work with Traditional Custodian groups, local gathering place organisations and Aboriginal and Torres Strait Islander businesses and people.

We commend the strong focus of the YSP to deliver on aspirations contained in the Wurundjeri Woi wurrung Cultural Heritage Aboriginal Corporation's *Nhanbu narrun ba ngargunin twarn Birrarung (Ancient Spirit & Lore of the Yarra)* water policy. However, given parts of the Yarra catchment are on contested Traditional Custodian's areas, we emphasise the need for broader engagement with other Traditional Custodian groups and Aboriginal and Torres Strait Islander Victorians who share the cultural values of the Birrarung. One suggestion we proposed for further consideration is to do this engagement process and complete cultural flows assessments for the whole of the Birrarung (Yarra River).

The plan should recognise the role YVW plays in contributing to the health of the Yarra River

In particular, page 22 & 23 of the plan should mention that Yarra River catchment boundaries are aligned with YVW's service area and emphasise YVW's responsibilities as the primary water and sanitation service provider in the Yarra River catchment. Yarra Valley Water and other Melbourne retailers also hold significant water entitlements in the Yarra River Catchment.

YVW has a crucial role to play in improving septic tank and wastewater management to achieve Traditional Owner and community visions for 'clean waters'. In the Yarra River catchment area, there are many old and non-compliant septic/onsite treatment systems that do not meet best practice/standards which result in offsite discharge of untreated or partially treated wastewater into waterways. While the management of the issues associated with these systems is outside the scope of the YSP, the cumulative effect of these septic tanks can create health and environmental impacts downstream in the Yarra River catchment and hence we believe it is a very significant issue that should be referenced in the plan.

YVW's Community Sewerage Program is providing sewerage solutions to service some of these areas where poorly performing septic systems have been identified by the local council. While YVW currently has no role in managing onsite treatment systems in an operating context, we are considering using onsite servicing approaches as an alternative option to sewer networks in circumstances where this approach could provide greater logistical and economic efficiency. Page 24 or 25 of the plan should include YVW's commitment to the community sewerage program which currently includes approximately \$345M of investment planned between 2018 and 2023 to improve septic tank and wastewater management in the catchment. It is recognised that connecting rural properties to the sewerage network does not always produce the best outcome for the community and a variety of techniques, including effective on-site servicing, should be implemented depending on the individual situation to

produce a fit-for-purpose outcome. Noting this, Figure 3 on page 50 of the YSP should not say “connecting rural properties to the sewerage system”. We suggest that a more appropriate terminology would be “urban and rural properties with fit-for-purpose wastewater management systems”.

YVW has been conducting a trial of onsite servicing in Park Orchards to better understand the costs, requirements and benefits of replacing legacy septic systems with a managed service. The results of this trial will be available later this year.

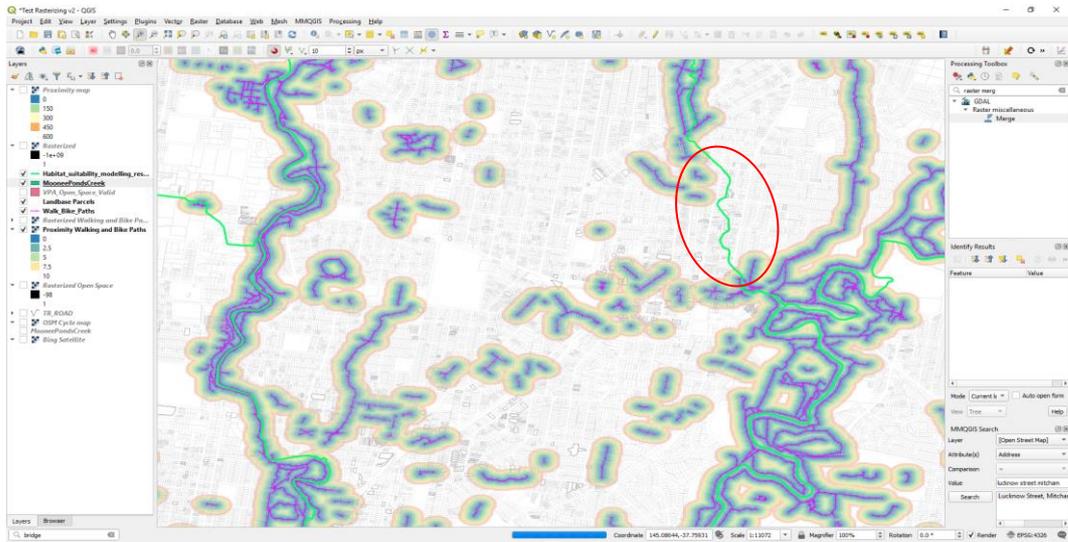
There seems to be a general lack of awareness and knowledge among home owners about onsite treatment systems. The YSP could support providing a structured education program around the proper operation and maintenance of onsite treatment systems, and to link the effects of poorly performing systems with downstream environmental and health impacts.

The YSP could also advocate that the Government address the issue of old septic systems through the new environment protection legislation. Many old septic systems were issued with a perpetual permit at the time of construction, however these systems no longer meet current standards or community expectations and it is difficult for authorities to mandate people to maintain or upgrade their systems.

YVW is continuing to monitor waterways and looking to extend our role in supporting research regarding the impact and risks associated with wastewater discharge into waterways (e.g. source could be from septic/onsite systems). We are also continuing our commitment to sewer maintenance to ensure our network mitigates risks in relation to spills.

YVW notes that other areas for opportunity include:

- Potential collaboration with the North East Link Project to maximise IWM opportunities and minimise environmental impact (e.g. by ensuring the integrity of Yarra Flats Park / Bolin Bolin Lake are maintained).
- Performance Objective 3 of the YSP has actions to ‘improve community access to the river by connecting recreational trail networks’ and ‘extend the parkland network to cater for a growing community’. Quantitative analysis could be used to support a prioritisation framework to identify and add areas to the parkland network along the Yarra River. The example in the graphic below shows an area of opportunity where there is no access to walking paths or parks within 100m of a river alignment.



The 10-Year Performance Objectives and Targets should be ambitious

The sewerage strategy prepared as a collaboration of Melbourne Water and the Melbourne water retailers, has set a goal for 100% beneficial use of wastewater resources over the next 50 years. For YVW, for example, this means we'll need to explore how discharges from our treatment plants can be beneficially used for waterway health, to reduce urban water demands on the drinking water system or to support other productive uses such as agricultural production.

YVW emphasises the importance of alignment of the YSP to the Healthy Waterways Strategy (HWWS) and believes the plan will be an important enabler in assigning the clear accountabilities required to achieve the Healthy Waterways targets for the Yarra. Water quality condition targets as identified in the HWWS are an important inclusion and stakeholders should be made aware of what would be required to achieve these targets when committing to them. Fully achieving the HWWS targets will be difficult but it is important to formalise targets like these and hold agencies to account when measuring performance against them.

The achievability of most of these actions depends heavily on the targets set in the final plan e.g. "Number of hectares of vegetation" could mean BAU planting or a genuine extension of current targets. Targets should be clearly linked to the actions and consideration should be given to further refining the actions and how they will achieve the targets. While most targets should be as measurable as possible, we note that some more qualitative targets remain important but will be more difficult to measure accurately.

An additional suggestion would be to consider adding accessibility to water fountains to the targets for 'Quality parklands for a growing population' – this has clear links with the liveability of the corridor.

Part 2 Land Use Framework

YVW notes that changes in development conditions can significantly improve stormwater management outcomes, however, Integrated Water Management (IWM) provides a more holistic view of the catchment. All water cycle elements should be considered in addition to stormwater.

In accordance with IWM principles, consideration should be given to options for water cycle management that go beyond stormwater management such as greywater reuse, rainwater tanks and recycled water reuse from sewage by both central and de-centralised systems.

Consideration of the North East Link Project (NELP) should also include investigation of IWM opportunities that could be facilitated by the NELP such as opportunities to:

- Incorporate designs for passive irrigation of street trees and surrounding vegetation
- Provision for future pipework along/near road or foot/bike path alignments to connect water, stormwater, sewage or recycled water infrastructure.

YVW notes the plan appears limited by focusing on the river alignment and a 1km buffer. Some of the community vision and IWM opportunities may only be met with catchment scale considerations (such as the community sewerage program in the wider catchment area).

To achieve this outcome, we propose that the YSP and IWM catchment plans being facilitated by DELWP should be aligned. This should include consideration of high-risk or high-opportunity activities/areas in the wider catchment that can influence water quality, river health or inhibit achievement of targets.

Opportunities for Significant Places

We agree that ‘the plan should also articulate how a change of use at the Carlton United Brewery site should achieve the community’s and Traditional Owners’ vision” (p119). We recommend that this notion should also be expanded to ensure opportunities to convert other brownfield sites directly on the river bank into highly valuable community assets are identified.