



29 June 2018

Chris Chesterfield
Chair – Stormwater Management Advisory Committee
Department of Environment, Land, Water and Planning
8 Nicholson Street
EAST MELBOURNE VIC 3002

Dear Chris,

Issues Paper for Improving Stormwater Management Advisory Committee

City West Water (CWW) strongly supports the development of the Improving Stormwater Management Advisory Committee Issues Paper and the opportunity to provide feedback to the Issues Paper. We are advocates for improved stormwater management and recognise the key role that it plays in Melbourne's liveability through both greener environments and healthier waterways and are excited by the prospect of enhancing its management.

Over recent years we have identified the opportunity that stormwater provides as an alternative water source to substitute potable supplies in order to achieve greater benefits for our community. We have developed six stormwater harvesting schemes in partnership with local councils, for irrigation of public open space and a school. In addition to this, our customers have given a clear signal through our recent Price Submission that localised stormwater harvesting is of high value to them as it provides amenity benefits. In response we have developed a Stormwater Harvesting Fund which will deliver \$2.5 million per year over five years.

In response to your Issues Paper, CWW provides the following specific comments:

1. **Scale (localised solutions):** We support any action that enhances clarity on how investment decisions are made to enable agile and effective decision making as new opportunities emerge. Our Urban Water Strategy highlights the important role that stormwater will play in the future water supply mix. In order to meet the needs of our growing population we have developed a diverse water portfolio which features a number of ways to manage the water we have available. In our experience the key to investment is optimising local investments based on local context. Access to other alternative sources (such as recycled water), the presence and extent of localised flooding issues and/or the need for local greening can have a significant impact on how the best service mix is delivered. These are all fundamental inputs to appropriate decision making.
2. **Urban planning meets water planning:** We support a full review of the Best Practice Environmental Management (BPEM). As it currently stands, BPEM solely focuses on water quality and doesn't have any requirements on flow attenuation. This can be a limitation on stormwater harvesting opportunities.

3. **Conceptual planning control option:** CWW strongly supports the proposed conceptual planning control option as it will provide consistency across Council boundaries. We recognise that this extends application of the BPEM to a wider cohort of development types. We consider that implementation of this change will require an appropriate delivery model to support all approval authorities to achieve prompt and clear resolution of development matters.

4. **Risk appetite:** We support any work that clarifies risk allocation when considering jointly funded proposals. We would value the development of a framework that simplifies this to ensure projects can be more easily realised. Opportunities for co-funding are emerging and are welcome. We have worked in partnership with both public and private businesses to revitalise the Upper Stony Creek. This and other projects such as Greening the Pipeline at Williams Landing are demonstrating how co-funding can a powerful way of achieving multiple benefits for our communities. A key to succeeding is to be clear about roles and responsibilities including a clear understanding of who bears the risks and costs of each phase of a project.

In addition to this formal response, City West Water will be represented at each of the workshops planned in coming weeks. We greatly appreciate the opportunity to share in the discussion across the industry on this important issue.

Should you require any further feedback, please contact Elisa Hunter, Strategy and Policy Manager on 9313 8523 for further information.

Yours sincerely,



DAVID RYAN
Managing Director
City West Water