

23 July 2020

[REDACTED]
Director, Planning Projects
Department of Environment, Land, Water and Planning
L9, 8 Nicholson Street
EAST MELBOURNE VIC 3002

Dear [REDACTED]

Strategic Extractive Resource Areas (SERA) Pilot Project

Thank you for the opportunity to provide feedback on the proposed boundaries and planning controls to secure extractive resources in two pilot locations. Melbourne Water supports the overall objectives of this project and understands the importance of securing strategic extractive resources in suitable locations.

Melbourne Water is both the regional drainage and floodplain manager and the waterway manager for the Port Phillip and Westernport region. As waterway manager, Melbourne Water works to protect and improve the quality of our waterways, establish healthy ecosystems and enhance biodiversity, as well as contributing to the health and wellbeing of Port Phillip Bay and Western Port, now and into the future.

As waterway manager, Melbourne Water facilitates the ongoing collaborative implementation of the *Healthy Waterways Strategy* catchment visions, goals, targets and performance objectives across all waterway stakeholders including Traditional Owners.

We understand from the consultation documents that this pilot project is trialling “the establishment of SERAs that will define the locations of strategic state resources while considering other existing land uses, environmental assets and community interests”. We recognise that the SERAs stem from Extractive Industry Interest Areas established in the 1990s, which were identified by a process that took into account environmental constraints as understood at that time. Furthermore, the SERAs are described as having “manageable environmental and planning constraints”. However, we note there are a number of key environmental issues that require appropriate consideration and management in the two pilot SERA locations in Wyndham and South Gippsland.

In the Wyndham SERA, a number of waterways (Werribee River, Little River, Lollypop Creek, Cherry Creek and some tributaries), which are priority areas intended for environmental improvement under the *Healthy Waterways Strategy*, appear to be within or intersect with existing or potential new extraction areas. Undertaking extraction works in these areas could have a number of significant impacts to the biodiversity, hydrology, and other environmental, social and cultural values of these waterway assets. Where the SERAs do not directly adjoin a waterway or natural asset, nearby extraction areas also have the potential to impact

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]



waterways and natural assets through other means, such as groundwater disturbance or contamination, altered flows from overland and groundwater sources, as well as impacts from dust, noise and machinery traffic.

In the South Gippsland SERA, we note that Adams Creek Nature Reserve, which is Crown Land with high biodiversity values, has been included in the SERA. The Lang Lang catchment as a whole has only a small area with high biodiversity value remaining, and this area is hence of significance. It is also necessary to consider potential impacts on the downstream environment of Western Port.

Although many of the environmental assets and considerations listed here have been identified in the consultation documents, it is unclear whether any further consideration is being given to the management of these issues at the strategic planning stage, or whether this is being deferred to statutory approval processes at the time a specific extractive industry is proposed.

We understand the SERAs are proposed to be incorporated into the planning system with associated planning controls to secure these sites for potential extractive resources. We recognise that application of the controls doesn't preclude the need for relevant planning and works approvals to be sought at the time the extractive industry is proposed, at which time the application will be assessed to ensure the extractive industry does not adversely affect the environment during or after extraction (as per Clause 52.09 of the Victoria Planning Provisions). Notwithstanding, it is at the strategic scale that significant gains can be made in guiding future development to most efficiently avoid potential impacts to environmental and community values.

With this in mind, Melbourne Water recommends that prior to finalisation and gazettal of the SERAs, further work is undertaken to ensure appropriate consideration of, and strategic planning direction on, the following aspects:

- potential impacts on biodiversity, water quality and groundwater contamination
- potential impacts on waterway values and current and proposed environmental improvement works as described in the *Healthy Waterways Strategy*
- cumulative impact of extractive industries on the supply of surface water flowing through the catchment over time (to ensure sufficient surface water flows through the sites for environmental flows and agricultural uses downstream)
- potential environmental impacts on downstream environments including Port Phillip Bay and Western Port.

Melbourne Water would welcome the opportunity to work with DELWP on these aspects. In recognising that DELWP is a core partner in the *Healthy Waterways Strategy*, we would be very pleased to work together to ensure the objectives of the strategy are considered in the finalisation of the SERA pilot project.

If you have any queries in relation to this submission, please do not hesitate to contact 

Yours sincerely

