

In reply please quote: FC2024/17384

11 November, 2024

[REDACTED]
[REDACTED]
Victorian Planning Authority
[REDACTED]
[REDACTED]

Dear [REDACTED]

Re: Agency Validation – East of Aberline Precinct Structure Plan (PSP)

Thank you for sending the draft package and allowing Wannon Water the additional time to comment.

Accompanying this letter, we have included some of the documents with some suggested changes that are consistent with correspondence, discussions, workshops and tours that we have had with the VPA and Council since 2018. The suggested changes, provide specific detail to enhance the requirement through the various planning mechanisms and assure that connection to the Roof Water Harvesting (RWH) network is a requirement within the precinct.

The PSP as presented appears to largely ignore the existence of Roof Water Harvesting and rely on the existing planning provisions for it to be incorporated wholesale within the precinct. Over more than five years of engagement with the VPA, Wannon Water has explained that this has not been an effective approach in the past and will not be robust enough to ensure RWH is connected throughout the new precinct. Wannon Water believes RWH should be mandatory for inclusion and the planning instruments impose a requirement to install the required pipework as part of a subdivision and connect - all homes, education and retail structures to the network.

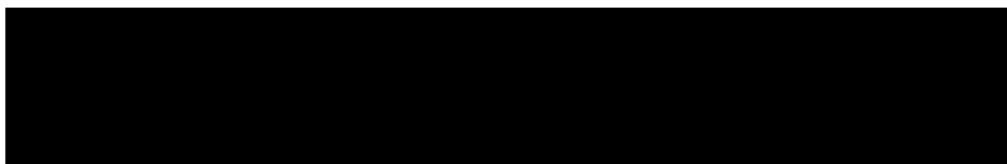
We have added some recommended changes in the form of *tracked changes* to the following documents:

Draft Amendment C218warr - EoA PSP 37_07s1 - Agency Validation.docx

- Wannon Water recommend adding detail to the stormwater management strategy. RWH contributes by reducing the volume of stormwater to council infrastructure and also to the waterways.

Draft Amendment C218warr - EoA PSP Explanatory Report - Agency Validation.docx

- Incorporate the addition of specific wording to ensure RWH is part of the drainage solution and can alleviate the size of retarding basins.
- Highlight the multiple benefits of RWH by off-setting water from the environment, reducing carbon intensive pumping, providing protection of local waterways from the impacts of urbanisation, and reduced infrastructure investment by local government.



[East of Aberline - Background Report - 28-9-24.docx](#)

- Highlighting recommendations from others, not listed in the background report.

[East of Aberline - PSP - Agency Validation - 28-9-24.docx](#)

- Incorporating RWH where relevant and correcting some wording.
- Request for removal of reference to vegetation value of old cypress trees adjacent to the Wannon Water water supply facility.

Other details such as the VPA engagement with Wannon Water and Council on RWH could also be included. There was nothing on the existing RWH operation in the background report – yet Wannon Water hosted multiple tours with VPA personnel to inspect the RWH infrastructure in operation in Warrnambool. In the time that Wannon Water have engaged the VPA on RWH, we have also hosted Melbourne Water, Central Highlands Water and other industry representatives to showcase our low-cost harvesting method. Multiple emails, presentations and discussions going back to 2018, including presentations on the harvesting method and innovative ways to locate buffer tanks within the development with the VPA, including DEECA and Warrnambool City Council.

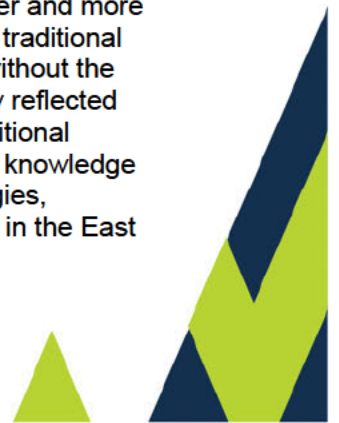
Wannon Water suggest the inclusion of RWH in the Glossary of terms with the following definition: *Rain that falls onto roofs of houses, schools, factories and businesses. The water travels through closed pipes via a water harvest connection point near the boundary on each lot. This water is then piped to the centralised raw water supply to mix with other sources for treatment to drinking water standard. Only roof downpipes and tank overflows can be connected to the system and each connection is inspected by Wannon Water.*

It is noted that a stormwater management report was commissioned by Warrnambool City Council in 2017 for this precinct but it is not referenced in any of the background documents. The report by Engeny Water Management calculated that if RWH was incorporated into the stormwater management for this region, there would be a saving of around \$4.5mil in wetland costs (down from \$8.5 mil to \$4.0 mil.). They also indicated that the mean annual runoff from the area with wetlands and WSUD measures increased by 112% but with RWH included it increased by 39% - a massive improvement.

Wannon Water provide the following comments under themes in regard to the package of documents received by us October 1, 2024;

Integrated Water Management (IWM)

The Great South Coast Integrated Water Management Forum covers Gunditjmara, Eastern Maar, Barngi Gadjin and Wadawurrung Country. The Forum has been working towards improved water management across our region since 2018. The work of the forum since its formation has brought about a noticeable cultural shift. As a result, there are richer and more beneficial collaborative projects underway between councils, water corporations, traditional owners and catchment management authorities that would not have happened without the forum. IWM has matured, gradually becoming business-as-usual, and that is now reflected in council documents and corporate plans. The influence and importance of Traditional Owner insights and perspectives cannot be understated. Learning from the deep knowledge and history of our region's Traditional Owners has indelibly influenced our strategies, bringing a richer and more profound sense of purpose. Wannon Water see RWH in the East



of Abeline PSP as being the most effective of WSUD solutions to realise, multiple benefits and adhere to IWM outcomes within the state policy frameworks.

Council Support

Council has previously submitted to the Panel for Warrnambool Amendment C77, which dealt with the issue of mandating roof water harvesting, that it should be done in future stages of the north-east growth area. The C77 Panel recommended that the inclusion of a mandatory requirement for roof water harvesting within the future growth area to the east of Abeline Road be further investigated as part of the structure planning process for that area. Council agreed and submitted that the structure planning process is the appropriate mechanism for consideration of roof water harvesting.

In more recent years, Warrnambool City Council has adopted “the incorporation of roof water harvesting infrastructure in new developments” in both the Green Warrnambool Plan and Warrnambool Council Plan 2017-2021 which was revised in 2019.

Policy drivers:

The Central and Gippsland Region SWS (Sustainable Water Strategy) has implemented a directive to reduce surface water extractions and increase what is termed ‘manufactured water’. RWH is categorised as manufactured water and its use encouraged by the SWS and other policy drivers such as Water for Victoria (Actions 5.1-8). The SWS Implementation Advisory Group has a specific action¹ assigned to Wannon Water to reduce extractions from the Gellibrand River.

In the Letter of expectations from the Minister for Water 2024-25, Wannon Water is required to manage water resources in a sustainable manner with key performance areas being integrated water management, water recycling and sustainable water use. Other key performance areas are emissions reduction and adapting to climate change. Roof water harvesting is a key initiative achieving these requirements.

Water for Victoria is the most current Victorian Government policy on water and has a range of objectives that are relevant to the adoption of roof water harvesting. The overarching objective is:- *We will include all elements of the urban water cycle in the way we plan and manage water so that Victorian communities can continue to thrive in all climates.*

Actions within this section refer to the use of alternate water sources, application of integrated water management, better management of stormwater and protection of waterways recognising the significant increase in runoff from urban development.

Environment and Cultural Heritage

RWH can assist by taking load off the stormwater network, contributing to lower infrastructure costs, lower ongoing maintenance costs and reducing flows to Russells Creek. This required protection is DPO Schedule 11 and called out in the Warrnambool Planning Scheme **02.03-3 Floodplain management** and **02.03-4 Natural resource Management; Minimising the impact of use and development on water resources and waterways**. RWH, as the most effective Water Sensitive Urban Design (WSUD) feature and can remove up to

¹ The Victorian Government, Wannon Water, Eastern Maar Aboriginal Corporation and Corangamite CMA will continue to work together to investigate a preferred water supply augmentation option to improve critical water flows in the Gellibrand River through the summer low flow period.

60% of post development flows, providing much needed protection for the waterway and reducing flood risks to people and property.

02.03-5 states that council is committed to *ecologically sustainable development principles in relation to water conservation, the minimisation of greenhouse gas emissions, protection of biodiversity assets and the protection of natural coastal resources.*

Locally sourced raw water such as RWH replaces water sourced from the Otway's catchment (100kms away) harvested via carbon intensive pumping. Once installed, RWH is low or carbon neutral.

Both the Gellibrand catchment and the Merri River catchment (Russells creek) would benefit from RWH being implemented for this precinct. If RWH is not implemented in this development, it is estimated that at least a further 640ML a year will be required from the Gellibrand River and around the same volume can be estimated to be retained within flood detention basins (at East of Aberline).

Feedback on the proposed objectives, requirements and guidelines

The objectives O11 and O27, 28 supported by the following requirements: R25-28, R31, R60, R65, R68. Utilising the following Guidelines: G2, G18, G28, G47-G52 are all confirmed by the implementation of RWH. However, guidelines are not a requirement and Wannon Water continue to request that there is a planning mechanism to make RWH mandatory for all subdivisions and buildings in the precinct.

Requirement R60 needs to include roof water harvesting reticulation network as being a subdivision requirement.

Other Water and Sewer Infrastructure

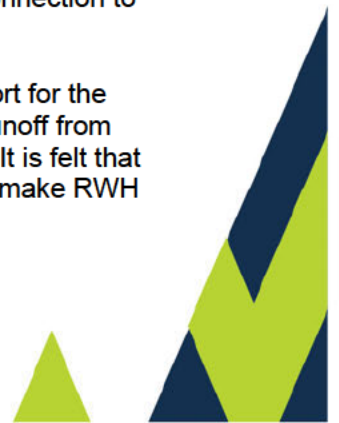
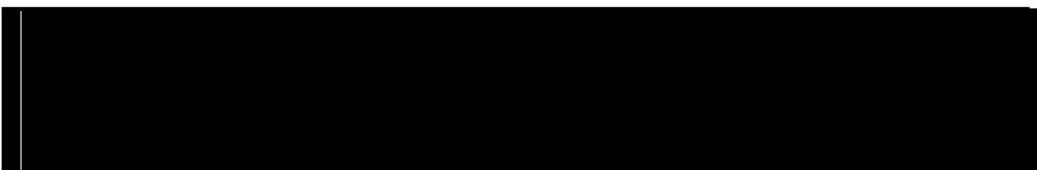
P40 4.4.1 within the background report has a planned buffer around Tozer reserve stating "active transport linkages are proposed around the reserve ".It needs to be recognised that water, sewerage and roof water infrastructure may need to cross the reserve and these should be incorporated with pedestrian access routes where possible.

The plans should include/refer to water storages (Dales Road reservoirs) and planned Sewerage Pump Stations (SPS) as well as RWH detention tanks required within the precinct. The VPA should refer to the State Government guidance note on Dam setbacks.

The location of the planned indoor recreation centre and public open space, as well as walking tracks and transport corridors within close proximity of the Dales Road water reservoirs must be appropriate for the sensitivity of the area and for water quality. We noted that the document "005zn maps": The map is showing the incorrect zone around our Dales Road storage, it should be PUZ.

Wannon Water are concerned that without strong mandatory requirements, subdivisions and buildings may occur in the future without Wannon Water being able to enforce connection to the RWH network.

As discussed above, there is strong State Government and Council policy support for the adoption of RWH as a means of reducing the detrimental impacts of increased runoff from urban growth areas and making the precinct an exemplar of water sustainability. It is felt that there is adequate evidence of the value proposition in the background reports to make RWH



a mandatory requirement of development in the precinct. Should you require any further information please contact myself or [REDACTED]

Yours sincerely

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