

In reply please quote: D2025/060832

20 October 2025

Victorian Planning Authority
re East of Aberline
GPO Box 2392
MELBOURNE VIC 3001

Email Eastofaberline@vpa.vic.gov.au

Dear VPA,

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

Having reviewed the exhibited documents for the East of Aberline PSP, Wannon Water is disappointed that the VPA has not seen fit to mandate the requirement for Roof Water Harvesting (RWH) within the precinct.

Our position remains consistent with submissions made to previous Planning Panels in Amendments C72warr and C77warr. Accordingly, we request that Amendment C217warr be revised to require developers to fund the design and construction of RWH infrastructure across the precinct.

Our response to the 'Agency validation' provides additional context to our request, is attached for reference.

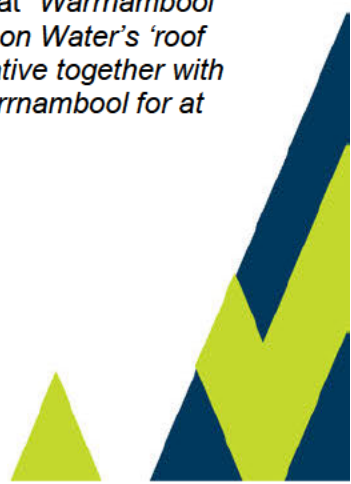
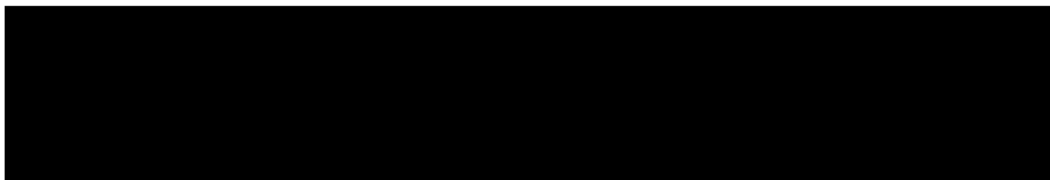
Background

Wannon Water sources drinking water from the Otway ranges and transports it 100 kilometres to Warrnambool, where it is treated and supplied to Warrnambool, Allansford and Koroit.

In 2007, Wannon Water prepared its *Water Supply Demand Strategy* which examined the water supply and demand situation over the next 50 years. This and subsequent strategies identified that as Warrnambool and surrounds grows, the demand for water will outstrip the supply (which is sensitive to climate change) requiring the development of new water resources and a range of demand reduction measures.

In 2010 Wannon Water obtained Federal and State support for a RWH pilot project. Its success allowed Wannon Water to drive the expansion of RWH throughout northeast parts of Warrnambool City.

Clause 02.03-8 (C93warr) of the Warrnambool Planning Scheme currently states that "*Warrnambool is at the forefront of integrated water management with the implementation of Wannon Water's 'roof water collection system' within the North-East Warrnambool Growth Area. This initiative together with the development of other groundwater resources, will meet the growth needs of Warrnambool for at least the next 50 years*"



Regional RWH systems operate via a dedicated roof water pipe network within subdivisions, separate from the stormwater system. This enables high-quality roof runoff to be captured and transferred to a central retention basin, where it is blended with other raw water sources before treatment and supply to customers as drinking water.

The issue

While the original pilot was supported through external funding, the continued expansion of RWH into Warrnambool's growth areas has relied on Wannon Water securing financial contributions through individual developer negotiations. This ad hoc approach is unsustainable, leaving Wannon Water to absorb significant unfunded costs.

To ensure the long-term success of RWH and the delivery of equitable and climate-resilient water outcomes for the community, there is a clear need for stronger planning mechanisms, supported by the VPA and relevant agencies, that mandate developer construction of RWH infrastructure.

Since 2018, Wannon Water has been discussing with the VPA the potential for planning controls within the PSP which would see developers fund the design and construction of the RWH network in the same way as water and sewerage reticulation works. This approach has been compared to the way 'dual water reticulation' (recycled water) systems have been mandated by other water corporations and successfully implemented through Clause 56.07-2 of the Victorian Planning Provisions.

The cost implications for developers are modest. RWH design and construction closely mirror gravity sewer systems, allowing for efficiencies in materials procurement and construction practices. In addition, developers already benefit from a significantly reduced New Customer Contribution (NCC) charge of \$1,124.22 per lot when RWH is provided, compared with the standard growth area NCC of \$5,905.07 per lot (as regulated by the ESC).

Wannon Water believes that mandating RWH within the PSP presents a clear opportunity to deliver best-practice outcomes in Integrated Water Management (IWM), protect urban waterways, and enhance long-term water security for the Warrnambool community. By doing so, the PSP can avoid the need to extract an additional 800 ML per year from the already stressed Gellibrand River system.

The existing RWH network, which has operated successfully for more than 15 years, demonstrates that this approach is both cost-effective and low-carbon compared with alternative new supply sources. RWH also provides broader system benefits, including reduced demand on Council stormwater infrastructure and lower ongoing maintenance costs for wetlands and detention basins, while enabling developers to maximise developable land.

Without VPA or Planning Panel support for a mandatory RWH requirement, Wannon Water will be forced to source water for approximately 5,000 new lots, including residential, educational and commercial uses, from increasingly constrained and stressed water systems.

Embedding RWH as a development requirement within the East of Aberline PSP is strongly aligned with a range of State and regional policies and strategies, including:

- *Water Security Plan* (Victoria)
- *Sustainable Water Strategy* (Central and South Gippsland and Western)
- *Water for Victoria*
- *Ministers Letter of Expectations*
- *Great South Coast IWM Strategic Directions Statement*
- *Urban stormwater management guidelines* (EPA)
- *Green Warrnambool* (Warrnambool City Council)

Wannon Water's RWH program continues to receive strong support from Warrnambool City Council, the Corangamite Catchment Management Authority, and the Glenelg Hopkins Catchment Management Authority.

Should the VPA support the inclusion of a mandatory RWH requirement, Wannon Water will work collaboratively to ensure timely implementation and avoid any delays to land release or housing supply.

Please do not hesitate to contact me if you wish to discuss this matter further.

Yours sincerely

