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Wednesday, 4 February 2021

Essential Service Commission  
Level 8, 570 Bourke St  
Melbourne VIC 3000

Dear Sir/Madam

**RE: MELBOURNE WATER PRICE SUBMISSION 2021**

Thank you for the opportunity to respond to the *Melbourne Water Price Submission 2021*. Council has feedback on the sections on the Price Submission outlined below.

**1. Land Development Projects**

The construction timing of end-of-line stormwater quality treatment assets in urban growth areas and its ability to meet the EPA's Best Practice Environment Management (BPEM) targets for urban stormwater management requires investigation. The approach appears to be to delay the delivery of infrastructure until the build out phase is almost complete. Some development areas are under construction for over 20 years, during which time the waterway values are irretrievably damaged. For example, Hume City Council has one greenfield estate with over 250ha of developed land, with about 90% of housing construction completed and occupied and no end-of-line stormwater quality treatment assets to meet the BPEM targets.

Currently Hume City Council is seeking advice from the EPA on the definition of 'temporary construction period' for staged subdivisions and how Clause 56 measures come into force. The BPEM targets should be met at all stages of subdivision and development and that separating the terms into construction period and post construction places our waterway values at risk. While the methods to manage environmental impacts in construction, land development, build out and ultimate phases may be different, the same fundamental waterway values need to be protected. Melbourne water should be provided with the necessary funding to deliver projects in line with this principle.

**2. Stormwater Harvesting Infrastructure**

Hume City Council has partnered with Melbourne Water to meet waterway objectives in the *Healthy Waterways Strategy* in the Sunbury Growth Area and Northern Growth Corridor. The expenditure for the Sunbury and Upper Merri Creek Stormwater Harvesting Infrastructure is in line with Council's policy on integrated water management. The investments outlined in the pricing submission reflect the community feedback received for these projects.

**3. Reimagining Your Creek**

Council is currently assessing options to naturalise and improve community access to Merlynston Creek and would be interested in applying to this program. Based on projects like the Stony Creek naturalisation, the \$20m budget allocation would only cover two such projects. An increase in funding for this program would allow a greater number of projects to be supported.

#### **4. Litter**

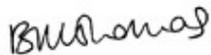
As outlined in the submission, litter is of high concern to the community. The recent initiative by Council and Melbourne Water to use Working for Victoria employees to remove litter from along waterways has resulted in significant improvement in waterway amenity. After the research is done in one creek (S2.3.3, Table 23) will that inform more investment in this area? If so, will this be within this pricing period or will it need to wait to be included in the next pricing period? It is noted that the investment focus will be on prevention rather than litter removal (S3.1.2) to reduce costs. Both preventative approaches and the removal of litter in meeting community expectations for litter management are equally important. An increase in litter funding is needed to better align with the high community concern and increasing amounts of litter with increasing population growth.

#### **5. Protecting Natural Wetlands**

It is noted there is an increase in protection for natural wetlands from 20 to 63 and from 600 to 1,900ha across Melbourne Water's service area. This increase reflects the work undertaken with Melbourne Water to identify needs and performance objectives in the *Healthy Waterways Strategy* for natural wetlands in Hume, including Kalkallo Creek wetlands.

If you would like clarification or further information on the information contained in this letter, please contact Angela Ganley, Senior Sustainability Officer, on [angelag@hume.vic.gov.au](mailto:angelag@hume.vic.gov.au)

Yours sincerely



**BERNADETTE THOMAS**  
**MANAGER SUSTAINABLE ENVIRONMENT**