

Introduction

Please find following key information about making a submission.

Who can make a submission?

Anyone is able to comment and make submissions on the Water for Victoria Discussion Paper.

How will submissions be used?

We want the final Water Plan to reflect the community's views. All submissions received will be reviewed and used to inform the final document.

Will submissions be publicly available?

Written submissions will be publicly available and will be able to be read by others, unless you have requested and been granted confidentiality status.

Why do I have to register to make a submission or comment online?

The information provided in the registration form will help us analyse the responses and help us know which issues are of concern to communities and stakeholders in which areas of Victoria.

Can I provide a submission in another format?

Given the high volume of submissions anticipated it is strongly preferred that the online form or the downloadable template be used. This will ensure the most effective evaluation of the issues raised in submissions.

How do I make a submission?

You will need to register to make a submission. Submissions and comments will close at 5.00pm AEDST Friday 29 April 2016. Once registered, there are two ways to make a submission:

- Complete the [online submission form](#)
- [Upload](#) your submission using this submission template. Note that the preferred format is MS Word.

As part of making a submission, you will need to agree to the privacy collection notice and statement of confidentiality. These are outlined in both the online submission and upload forms.

Do I have to respond to all of the questions in the submission form for my views to be heard?

Not at all. You are welcome to respond to as many, or as few, of the questions as you would like.

Can I comment on other areas not addressed in the Discussion Paper?

The Water for Victoria Discussion Paper and consultation process is asking Victorians to take a look at some particular aspects of water – particularly those outlined in the ‘proposed strategic directions’.

These have been put forward as areas where community members and stakeholders can make the most impact in the decision-making process within the final Water Plan document.

You are welcome to comment on other areas not addressed in the Discussion Paper which you feel should be a part of this document. However, we do recommend that you first check the Department’s consultation website: haveyoursay.delwp.vic.gov.au to see if your area of focus falls within a different policy document or consultation process.

Chapter 2: Climate change

Proposed objective: Victoria will continue to invest in climate science to understand the impacts of climate change now and into the future. The water sector will play an important role in both climate change mitigation and helping our communities to adapt to climate change. Our water sector will be prepared to minimise the disruption that extreme events like flood and bushfire may cause to the provision of this essential service.

2.1. The Discussion Paper proposes that:

'The government will continually build our understanding of the impacts of climate change by working with a range of partners such as communities, research organisations, businesses and industry. This will help ensure that the Victorian Water Sector is well prepared to plan for and adapt to future climate change'.

Do you agree with this idea? If so, who should the water sector be working with on the impacts of climate, and how?

The Australian Institute of Landscape Architects (AILA) is committed to building on the understanding of the impacts of climate change, and the role of green (or living) infrastructure* planning and management approaches (including water sensitive urban design and integrated water cycle management), to enhance the effectiveness of responses to climate change. As such, AILA would like to be involved with the water sector to mitigate the impacts of climate change.

AILA is the national advocacy body for landscape architects. AILA represents 2,500 active and engaged landscape architects, promoting their crucial role in shaping the world around us. Our membership covers a diverse range of professional services including strategic planning, urban design, building settings, public realm and open space design and natural resource management working across all levels of government and within the private sector.

We strongly believe that understanding climate change is essential to ensure that all sectors of the Victorian community, including the water sector, are well prepared to plan for and adapt to future climate change. Thus dialogue and partnerships must always involve the full range of stakeholders, including research organisations, business, professional bodies, industry, local government and the water sector.

An effective example of a partnership approach is the Greening The West project, which has brought together a range of stakeholders to inform and exchange ideas, and work collectively on a greening strategy in anticipation of climate change

*Green infrastructure is defined as *'The network of natural and built landscape assets, including green spaces and water systems within and between settlements. Individual components of this environmental network, such as gardens, parks, recreation areas, highway verges and waterways, are sometimes referred to as 'green infrastructure assets' (Australian Standard 5334-2013 : Climate change adaptation for settlements and infrastructure - A risk based approach).*

2.2. The Discussion Paper proposes that:

'The water sector, including water corporations and catchment management authorities, will maximise its contribution to climate change mitigation by achieving carbon neutrality. The government will work with the water sector to consider implications for the sector and determine an achievable time period for this to occur. In the interim, the water sector will:

- **Contribute to carbon reduction targets set by the government**
- **At least match the state's renewable energy target through the development of renewable energy sources or purchase of renewable energy generation certificates**
- **Exploit carbon sequestration opportunities identified catchment management authorities**
- **Maximise the energy efficiency of its operations and premises.'**

Are there any other opportunities or challenges that we should be aware of?

Vegetation including (urban forests) provides greenhouse reduction through carbon sequestration. However the performance and on-going health of vegetation is reliant on a source of water, particularly during periods of drought. It should therefore be a priority for water authorities to partner with public landowners to future proof the planting and ongoing resilience of trees throughout our built environments.

Another opportunity for potential carbon sequestration is through 'Blue Carbon' such as via constructed wetlands. Better understanding of the potential value of wetlands as carbon sinks could increase their ability to attract funding for their implementation.

2.3. The Discussion Paper proposes that:

'The government will track the impacts of climate change on our environment and communities by:

- **Developing a monitoring, evaluation and reporting framework for the water sector**
- **Collating information collected to guide ongoing action to address the impacts of climate change**
- **Using the framework to guide evidence-based decision making and adaptive management across the water, catchment and agriculture sectors.'**

How strongly would you support this direction? Do you have any further advice for the Department on this proposed direction?

Please explain your response:

AILA strongly supports the Government's aspiration to restore Victoria as a leader in climate action. We also advocate for a holistic and multi-benefit 'Water Sensitive Cities' approach to water management to avoid the future need for more energy intensive augmentation of our water supply such as via desalination.

AILA supports the general direction proposed, and encourages effective planning and decision making about water storage, distribution and use that ensure environmental flows are maintained at levels that sustain natural ecological processes.

Any other comments about Chapter 2: Climate change?

Chapter 3: Waterway and catchment health

Proposed objective: To protect all waterways from the adverse impacts of human use and improve the condition of priority waterways to support environmental, social, cultural and economic needs and values of communities now and into the future.

3.1. The Discussion Paper proposes that:

'Through implementation of regional waterway strategies, which identify priority waterways in consultation with local communities, the government proposes to:

- **Improve the health of 36 priority waterways, by focusing investment on large-scale projects to achieve targeted outcomes over the next 30 years**
- **Continue investing in on-ground work and environmental water management of other local priority waterways identified in regional waterway strategies for community benefits**
- **Establish long term evaluation sites and ensure that waterway managers monitor and report back to communities on the progress of securing environmental outcomes.'**

How strongly would you support this direction?

AILA supports investment in large-scale projects, on-ground work and environmental water management of other local priority waterways.

3.2. The Discussion Paper proposes that:

'Over the next four years the government will build on the Victorian Waterway Management Strategy by:

- **Implementing the Regional Riparian Action Plan to accelerate priority onground riparian work**
- **Improving the health of the Gippsland Lakes by continuing to support the Gippsland Lakes Coordinating Committee and investing in on-ground works and community engagement**
- **Introducing legislative provisions to protect the Yarra River from inappropriate development and promote the river's amenity and significance.'**

What feedback would you provide about this proposed direction?

AILA supports any endeavour that protects and promotes riparian landscapes, the Gippsland Lakes and the Yarra River. AILA suggests that comprehensive master plans be developed for significant rivers, the Gippsland Lakes and the Yarra River, which identify short-, medium-, and long-term objectives for each and strategies to achieve them. When developing these master plans, all values associated with each site or suite of sites, in the case of the Yarra, should be considered, including environmental, economic, aesthetic and experiential, and issues around equity and ethics. The master plans should include the waterbodies and surrounding landscape, as appropriate.

Legislative and regulatory support should be introduced to protect and enhance the amenity of these waterways and their landscapes. This could include planning controls for set-backs, building height limits, protection of existing vegetation etc.

3.3. The Discussion Paper proposes that:

'The government will continuously improve environmental water management practice by:

- **Continuing to work in close partnership with communities, its regional partners, the Commonwealth and other state governments to achieve environmental outcomes under the Basin Plan and other intergovernmental agreements**
- **Delivering on the existing commitment to provide an additional eight gigalitres of environmental water to the Thomson River**
- **Reconfirming Central Region Sustainable Water Strategy environmental water recovery targets and identifying options to meet existing shortfalls with local communities and stakeholders in the Moorabool, Barwon, Werribee and Maribyrnong Rivers**
- **Continuing to invest in environmental works and measures to make the most efficient use of the available environmental entitlements and maximise environmental outcomes**
- **Ensuring that the Victorian Environmental Water Holder, working with waterway managers, continues to identify and report on opportunities for shared benefits from environmental watering, which will support recreational benefits to local communities and benefits to Traditional Owners. This will occur where it is cost effective and aligns with environmental objectives**
- **Ensuring environmental watering program partners monitor and report back to communities on their progress towards expected environmental outcomes.'**

How strongly would you support these steps? Have we missed anything?

AILA draws your attention to the multiple benefits from environmental watering. As well as recreational benefits, other benefits to be considered include aesthetic, spiritual, sense of place, cultural heritage, education/knowledge and social relations. These are multiple benefits of the ecosystem services of waterways, which should all be maximized in environmental water management.

3.4. The Discussion Paper proposes that:

'The government will protect all Victorian waterways from the adverse impacts of human use by:

- **Investigating opportunities to enhance waterway protection mechanisms through planning instruments. In the first instance, for the Yarra River, this will be explored through the work of the Yarra River Protection Ministerial Advisory Committee**
- **Improving understanding of how and where land use and management in Victoria has the greatest impact on waterway health**
- **Developing and implementing a new State Environment Protection Policy (Waters) to:**

- **Confirm the beneficial uses of Victorian ground waters and surface waters**
- **Confirm the water segments to which beneficial uses apply**
- **Set water quality indicators and objectives to protect beneficial uses**
- **Establish a contemporary risk-based framework for the management of unlicensed pollution sources – both point and diffuse sources in rural and urban areas**
- **Provide for the development of plans to manage improved water quality outcomes**
- **Enable water quality offsets to be used within catchments to maintain regulatory compliance within waterways, taking into account work previously conducted by the Victorian water industry.'**

What advice or feedback do you have for the government about this proposed direction?

As noted in our response to 3.2, AILA supports the provision of legislative and regulatory controls to protect and enhance the Yarra River Corridor.

3.5. The Discussion Paper proposes that:

'The government will strengthen community engagement and participation in waterway and catchment health through:

- **Involving the community to a greater extent in planning, priority and outcome setting, on-ground work and monitoring**
- **Continued support of Landcare, Waterwatch, EstuaryWatch and other citizen science initiatives**
- **Building partnerships with recreational anglers to plan, deliver and monitor projects to improve fish habitat.'**

How strongly would you support this direction? Have we missed anything?

AILA supports the strengthening of community engagement and participation in waterway management.

3.6. The Discussion Paper proposes that:

'The government will improve waterway health knowledge, monitoring and innovation by:

- **Establishing a waterway research hub to:**
 - **Review Victoria's waterway monitoring program design**
 - **Synthesise and share available knowledge and evidence**
 - **Coordinate research to test assumptions between outputs and outcomes**
 - **Investigate new technologies to assist large scale, long term information**

gathering and how to perform work activities more efficiently and effectively

- **Developing and applying Environmental-Economic Accounting for waterway and catchment health to assist in decision making**
- **Investigating carbon accounting methods for waterways.**

The waterway research hub will be based at the Arthur Rylah Institute and will work collaboratively across government and research organisations.'

What do you think about this proposal? Are there other opportunities we should consider?

AILA supports investment in research and innovation as part of a long term investment in waterway and catchment health as well as knowledge leadership.

Any other comments about Chapter 3: Waterway and catchment health?

Chapter 4: Water for agriculture

Proposed objective: To protect all waterways from the adverse impacts of human use and improve the condition of priority waterways to support environmental, social, cultural and economic needs and values of communities now and into the future.

4.1. The Discussion Paper proposes that:

'Victoria will support water users to adapt to changing water availability by:

- **Monitoring, assessing and reporting on the capacity of the system to deliver**
- **Ensuring tariffs and charges reflect the costs to deliver water**
- **Supporting an open water market, with transparent market information, and free from artificial barriers to trade, to provide users with the greatest possible flexibility to respond to changes in external factors.'**

How strongly would you support this direction, and why?

4.2. The Discussion Paper proposes that:

'The government will:

- **Continue to prioritise projects that meet its 1,075 gigalitre obligation under the Basin Plan. It will maintain a focus on system efficiencies**
- **Seek to maximise the sustainable diversion limit offsets up to 650 GL, with other Basin jurisdictions. Together these two directions will ensure no further non-strategic water purchase is needed from the Commonwealth**
- **Undertake its own socio-economic impact analysis into the impact of water recovery, to ensure that any further recovery from Victoria is based on robust evidence that it can be done with neutral or better social and economic impacts. This work will inform Victoria's discussions with the Commonwealth.'**

What are your reflections on these proposed actions?

4.3. The Discussion Paper proposes that:

'The government will develop a Victorian Rural Drainage Strategy for public release within two years. It will be prepared through an open and consultative process.'

Do you have any advice on the development of this strategy or the engagement process to support it?

4.4. The Discussion Paper proposes that:

‘Water corporations will provide water resource information for consideration in regional planning by local governments and agribusiness investment facilitation by the Department of Economic Development, Jobs, Transport and Resources. This will include information on both traditional and alternative fit-for-purpose water supplies.’

How strongly would you support this direction, and why?

4.5. The Discussion Paper proposes that:

‘The government will support the long term viability of Victoria’s irrigation sector by:

- **Focusing investment in rural water infrastructure that improves irrigation system efficiency and levels of service, consistent with the investment principles included in the Plan**
- **Providing specialist independent advice and incentives for whole-of-property-planning to irrigators to enable informed decisions about their water use, and how to participate in broader system modernisation projects.’**

Do you have any advice on these actions, or others the government might consider?

4.6. The Discussion Paper proposes that:

‘The government will increase the resilience of rural communities by:

- **Investing in rural water infrastructure that improves reliability of supply of domestic and stock use for rural communities, consistent with the principles on page 63**
- **Improving information on the constraints to and availability of Emergency Water Supply Points. The government will clarify the roles and responsibilities of local government and water corporations in the management of Emergency Water Supply Points. The government will also clarify pricing policy for emergency water supplies.’**

Do you have any advice on these actions, or others the government might consider?

4.7. The Discussion Paper proposes that:

'The government will consider future funding for rural water infrastructure projects using the following principles:

Net public benefit

- **The health of the environment must be maintained or improved**
- **Net public benefits to the regional economy and community values must be demonstrated.**

Long term viability

- **Consistent with Regional Strategic Plans, Regional Growth Plans and land use planning**
- **Net benefits achieved under a range of future water availability scenarios**
- **Consistent with any relevant land use suitability assessments, including soil quality, and agricultural policy**
- **User demand and support for the proposed service is demonstrated, including assessment of its long term service cost affordability.**

Value for money

- **Positive and comparable cost-benefit analysis of social, economic and environmental outcomes, including water savings, economic growth, and environmental sustainability**
- **Cost share with proponents is proportionate to the public and private benefits.'**

What are your reflections on the proposed principles?

4.8. The Discussion Paper proposes that:

'The water sector will work proactively with the Department of Economic Development, Jobs, Transport and Resources' Invest Assist and agribusiness facilitation service, and with the Regional Partnerships to:

- **Clarify and communicate roles and accountabilities in facilitating agricultural development opportunities in new or existing areas**
- **Ensure water users and potential investors have access to the water-related information that they need to make timely and informed decisions about potential new environmentally sustainable agricultural developments.**

The water sector will work proactively across the Department of Environment, Land, Water and Planning to streamline water-related regulation and approval processes while maintaining protections for third parties and the environment.'

What feedback or advice do you have on this proposed direction?

4.9. The Discussion Paper proposes that:

'The water sector will support agricultural development by providing information and advice on long term water supply, availability and reliability to planning authorities.

Regional Partnerships provide a mechanism to consider if proposed land use zone changes are inconsistent with rural water infrastructure investment and food and fibre objectives of the Victorian Government, where this is a regional issue.'

How strongly would you support these steps? Have we missed anything?

4.10. The Discussion Paper proposes that:

'The government will review water-use licences to ensure they are contemporary, relevant to the conditions and responsive to regional differences, and consistent with the Basin Salinity Management 2030 (see Discussion Paper for further details) and the State Environment Protection Policy (Waters) which is currently under review (see Chapter 3).'

Are there any particular factors you feel should be part of this review process?

4.11. The Discussion Paper proposes that:

'The government will provide ongoing support for Victoria's water quality and salinity management activities and monitoring to ensure ongoing compliance with its obligations under the State Environment Protection Policy (Waters), the Murray-Darling Basin Plan and the Basin Salinity Management Strategy 2030.'

How strongly would you support this direction, and why?

4.12. The Discussion Paper proposes that:

'The government will develop a strategic direction for the Victorian Irrigation Drainage Program for the next five years, in consultation with landholders and other stakeholders.'

What feedback or advice would you provide to the government about this direction?

Any other comments about Chapter 4: Water for agriculture?

Chapter 5: Resilient and Liveable Cities and Towns

Proposed objective: Water will support the transformation of Victorian cities and towns to be the most resilient and liveable in the world. We will plan and manage all elements of the urban water cycle in an integrated and innovative way to improve environmental, social and economic outcomes for our communities.

5.1. The Discussion Paper proposes that:

'Government will support resilient and liveable cities by adopting a whole-of-government approach. In particular, the water, urban planning, and local government portfolios will align key strategies, including the water plan, Plan Melbourne Refresh and the Metropolitan Open Space Strategy to support the water-related outcome areas described in this chapter.'

What feedback or advice would you provide to the government about this direction?

AILA supports a whole-of-government approach to water as an enabler to support the liveability of public spaces (improved greening, biodiversity, recreation opportunities, urban cooling etc).

Partnerships that seek to improve liveability like the 'Greening The West' project need to be championed, while interdisciplinary design teams at local government must be supported to ensure our public spaces transition from traditional 'grey infrastructure' to multifunctional and multi-benefit 'green infrastructure'.

The Victorian government is encouraged to ensure that all cities and towns in the State have an extensive tree canopy cover, contributed by a large number of trees, and abundant green spaces to ensure the all cities and towns in the State are liveable. With increasing densification of urban areas, smaller lot sizes and the loss of canopy trees in the private realm, it is imperative all levels of government take a lead on promoting programs and projects that maintain liveability of our cities and towns – including healthy waterways, efficient water use and enhancing urban forests to address urban microclimates.

5.2. The Discussion Paper proposes:

'Government will make the best use of all water sources by:

- **Promoting the use of all available sources to support liveability outcomes where the water sources are fit-for-purpose**
- **Requiring water corporations to effectively assess the use of all potential water sources in the development of their Urban Water Strategies (these strategies are required under the current Statement of Obligations for water corporations)**
- **Promoting an evidence-based approach to diversifying our water portfolio that enables informed community consideration of the role of all potential sources of water supply.'**

How strongly would you support this direction, and why?

AILA endorses a direction that not only promotes but facilitates the better use of all water sources, including fit-for-purpose use. In particular, Victoria's Water Framework should adopt a City-as-Catchment philosophy so that, over time, as much rainfall as possible flows through our streets, parks and public spaces to ensure that green infrastructure regularly receives water and becomes

a key living system of cities and towns.

5.3. The Discussion Paper proposes that:

'Government will support enhanced stormwater management to realise multiple benefits, with a particular focus on protecting urban waterways by:

- **Reviewing current obligations and management practices to ensure that all types of development more effectively manage adverse stormwater impacts and that there are effective economic incentives to mitigate the impacts of runoff**
- **Supporting best practice through updating integrated water management standards in planning schemes, as part of ensuring we have the best mix of tools to address stormwater management.'**

What feedback or advice would you provide to the government about this direction?

It should also be acknowledged that our urbanised areas contribute significantly towards the degradation of the health of our waterways, and this pressure will continue to increase with population growth and further urban densification. AILA therefore supports more effective development planning controls to mitigate the environmental impact of stormwater run-off into our waterways and to meet best practice objectives for integrated water management.

AILA advocates the introduction of catchment-based water management strategies that optimize fit-for-purpose use of water from different sources. In particular, stormwater should be harvested treated and reused in residential, commercial and industrial areas, to maximise its use in the fabric of the city. In addition, this water could be used in the urban landscape to sustain green infrastructure.

5.4. The Discussion Paper proposes that:

'Government will support more effectively realise opportunities from recycled water and wastewater management by:

- **Improving and clarifying regulatory arrangements for recycled water schemes, particularly clarifying roles and responsibilities and other key issues identified in previous reviews of the regulatory framework**
- **Encouraging water corporations and waste management agencies to explore waste to resource opportunities**
- **Promoting the use of innovative solutions to improve management of on-site domestic wastewater and sewerage infrastructure, including through the proposed IWM planning framework.'**

How strongly would you support this direction, and why?

AILA strongly supports any direction that facilitates an integrated, environmentally sensitive approach to water management, including waste to resource opportunities. In particular, AILA advocates the importance of any measure that reduces our reliance on reticulated potable water and the delivery of low to zero water-mile outcomes.

5.5. The Discussion Paper proposes that:

'Local and regional IWM planning will engage the community to deliver on the following core outcome areas for urban water management:

- **Safe, secure supplies**
- **Effective management of wastewater**
- **Flood resilience**
- **Healthy and valued waterways**
- **Healthy urban landscapes.'**

What feedback or advice would you provide to the government about this direction?

AILA advocates an integrated, environmentally sensitive approach to the management of all our urban and regional waterways and supports the goals and objectives of the National Water Commission in driving progress towards sustainable management and use of our water resources, at both local and regional scales. Given the key role of landscape planning processes in the design and management of waterways, water supply and distribution networks across myriad landscape contexts, AILA could provide important advice on water sensitive urban design strategies, green infrastructure planning and landscape management to support this direction. For example, AILA could advise on appropriate canopy cover for healthy urban landscapes across Melbourne and other cities and towns. It could inform Urban Forest Strategies at a local level, to achieve desirable canopy covers, which could be enabled by sustainable urban stormwater management. Greening The West is an example for a regional approach to creating 'Healthy urban landscape' that should be applied to other regions of Melbourne.

5.6. The Discussion Paper proposes that:

'Government proposes the following new core elements as part of a new framework for urban water planning for Victorian cities and towns:

- **Sub-regional planning – Government will identify priority areas for IWM planning and will continue to support existing IWM processes**
- **Local IWM planning – Local IWM planning will be developed where required to identify integrated water cycle servicing solutions to meet place-based outcomes and guide delivery plans of the various participants**
- **Responsibilities for IWM planning – Government will work with water corporations, local government and other key parties to determine roles and responsibilities for IWM planning**
- **Formalised agreements, guidelines and templates – Government will work with water corporations, local government and other key parties to provide guidelines and templates for the development and implementation of IWM plans. This process will also consider the need for support for local government in the development and implementation of IWM plans. Arrangements for implementation of IWM planning will be formalised through agreements between water corporations, local government and other delivery partners**

- **Legislative and regulatory support for IWM plans – Government will also consider options for embedding IWM planning into relevant legislation.'**

How strongly would you support these core elements of a new framework, and why?

AILA strongly supports these core elements of a new framework. IWM must be underpinned by water sensitive urban design, involving a broad range of water professionals, council staff and the community. Street upgrades across the city at a local government level need to embrace integrated design by engineers and landscape architects to have water sensitive urban design and green infrastructure reshape the way streets are built. Suburban roads must operate as transport systems for people, cars etc, as well as providing green infrastructure to mitigate increasing temperatures in urban areas, provide ecosystem services* and embed nature within our cities. State governments need to ensure funding is available to local governments for converting grey infrastructure to green infrastructure, like the Upper Stony Creek project in Sunshine North. Green boulevards across all of Melbourne could be the first layer of establishing green veins throughout the city for all citizens to enjoy in their daily travels. Opportunities for IWM and associated water sensitive urban design have not been maximized to date. Planning agreements, guidelines and templates rely on legislation and regulatory support to be implemented optimally.

* Ecosystem services are defined as the environmental services provided by healthy landscape systems from which humans benefit, such as plant pollination, air filtration, pollution treatment, storm water management and carbon sequestration. They also include cultural benefits, such as recreation, sense of place and social connection.

5.7. The Discussion Paper proposes that:

'Government will enable widespread adoption of IWM through the following:

- **In consultation with the Department of Treasury and Finance and the Essential Services Commission, developing economic evaluation and cost allocation guidelines to support whole-of-life investment decisions to be incorporated into IWM planning**
- **Requiring water corporations to consider alternative servicing strategies when making investment decisions**
- **Working with industry to refine and embed the 'avoidable system cost' project and other mechanisms to support whole-of-life assessments**
- **Working with the sector to support capacity building, particularly in regional towns and cities, including considering the potential benefits of IWM facilitators**
- **Providing support for local councils to assist in facilitating IWM planning processes, particularly in resource constrained locations across the state**
- **Supporting research undertaken by academic institutions, such as the Cooperative Research Centre for Water Sensitive Cities**
- **Investigating innovative funding models to support liveability outcomes.'**

What comments do you have about this direction? Have we missed anything?

5.8. The Discussion Paper proposes that:

'Government will better integrate urban water management and land use planning and development by:

- **Integrating water outcomes in key government strategies, such as the Plan Melbourne Refresh, Metropolitan Open Space Strategy, Regional Growth Plans, the Biodiversity Strategy and the Yarra River Protection Bill, and major projects (such as the Level Crossing project)**
- **Aligning water outcomes with urban land use planning instruments and standards, such as state and local planning policy frameworks and Environmentally Sensitive Design performance standards for buildings**
- **Working with water corporations to clarify expectations on how their land can be better used to optimise liveability outcomes**
- **Working with water corporations, planning agencies and local government to develop water sensitive urban planning and design guidelines that incorporate IWM, which will need to be tailored to reflect local circumstances. The guidelines will initially focus on Melbourne, and will then be adapted for use across Victoria.**

How well do you think these steps will work to better integrate urban water management and land use planning and development? What advice would you give to the government?

AILA supports this direction and these proposals as they go some way toward better integrating urban water management and land use planning and development. One important driver to achieve this integration would be to consider living green infrastructure equally as an asset class, and to elevate the value of trees in determining urban landscapes in the planning scheme. All agencies who manage infrastructure within the public realm should also embrace the value of trees so that the living infrastructure thrives within the city rather than being subjugated and mutilated in adherence to guidelines and clearance requirements.

5.9. The Discussion Paper proposes that:

'Government will:

- **Develop a high profile, collaborative behaviour change campaign for residential and non-residential (i.e. a benchmarking target approach capable of reflecting local contexts and priorities), working with appropriate research and industry institutions**
- **Develop a program to encourage and facilitate the creation of green spaces at the home and community level, noting that focused effort is required at the community level in contributing to green urban spaces to support liveable cities and towns**
- **Partner with water corporations and local government to build an informed and engaged community, including ensuring water-related data and information is available and accessible to water customers and the community.'**

What feedback or advice would you provide to the Government on this proposed direction?

Any other comments about Chapter 5: Resilient and Liveable cities and towns?

Chapter 6: Recognising and managing for Aboriginal values

Proposed objective: Victorian water planning and management frameworks will consider the cultural value that water has for Aboriginal people through participation. Our existing water planning and management processes will have regard to the rights and interests of Victoria's Traditional Owners through collaboration.

6.1. The Discussion Paper proposes that:

'The Government will support an expanded program of projects to identify Aboriginal water values, uses and objectives across Victoria and to facilitate their inclusion in the water planning and management frameworks.'

How strongly would you support this direction, and why?'

AILA strongly supports engaging with indigenous communities and adopting a 'Connection to Country' approach to water planning and management projects and processes to ensure holistic and sustainable long-term plans supported by all sectors of the community.

6.2. The Discussion Paper proposes that:

'The Government will consider Aboriginal values and ecological knowledge into water planning and management frameworks. A range of mechanisms for achieving priority Aboriginal water objectives will be developed through partnership and collaboration between water resource managers and Traditional Owners. This will include exploring opportunities for achieving shared benefits.'

What feedback or advice would you provide to the Government on this proposed direction?

AILA advocates for government investment in capacity building within indigenous communities to allow for genuine contribution and ongoing support of Traditional Owners.

6.3. The Discussion Paper proposes that:

'The government will build increased participation of Aboriginal Victorians in water management by:

- **Building the capacity of the water sector to collaborate with Traditional Owners**
- **Seeking advice from Aboriginal water reference groups**
- **Supporting the appointment of Aboriginal people to key positions in the water sector**
- **Investigating further opportunities for scholarships and internship programs.**

The government will work with Traditional Owners to identify barriers to them accessing water to meet cultural flows objectives and to inform their decision about whether to enter the water market.'

What comments do you have about this direction? Have we missed anything?

AILA advocates for government investment in capacity building within indigenous communities to

allow for genuine contribution and ongoing support of Traditional Owners.

Any other comments about Chapter 6: Recognising and managing for Aboriginal values?

Chapter 7: Recognising recreational values

Proposed objective: Victoria will recognise the shared benefits enjoyed by recreational users on and around water storages and waterways, while maintaining the rights and obligations of entitlement holders. Recreational communities will be included in water planning and management decisions to improve their resilience to the impacts of drought and climate change.

7.1. The Discussion Paper proposes that:

'The government will enhance the water planning and management framework to ensure that water sector agencies:

- **Consider recreational benefits along with the multiple uses of water and waterways in annual and long term planning**
- **Undertake effective engagement to support consideration of community recreational objectives in planning and management decisions**
- **Establish collaborative approaches between the water sector, community members and other agencies to achieve recreational and regional outcomes.'**

What feedback or advice would you provide to the government on this proposed direction?

AILA advocates the consideration of encumbered land (such as storm water retardation areas, wetlands) as valuable and usable open-space recreational areas that are appreciated by the community.

Management of these types of open space areas requires an integrated and collaborative approach across agencies to ensure that effective planning and design decisions are implemented with due consideration to a number of factors - rather than just maintenance objectives and capabilities determining the outcomes.

7.2. The Discussion Paper proposes that:

'The Government will build capacity of recreational water users by:

- **Requiring water agencies to provide better, more recreational user friendly, information about their water and waterway management activities, and the resulting opportunities or limitations on recreational enjoyment of our waterways**
- **Requiring water agencies to be more transparent about water and waterway management decision making and outcomes**
- **Providing more coordinated avenues for accessing information about the water framework and statewide recreational values across multiple relevant information sources and agencies.'**

How strongly would you support this direction, and why?

7.3. The Discussion Paper proposes that:

'The government will ensure the transparent allocation of costs of providing recreational benefits by:

- **Building our understanding of the costs of providing improved recreational outcomes**
- **Reviewing existing mechanisms to meet the costs of providing recreational services relating to waterways**
- **Where additional costs are incurred to provide increased recreational benefits, determining a transparent method of cost recovery on a beneficiary pays basis.'**

What comments do you have about this direction? Have we missed anything?

Any other comments about Chapter 7: Recognising recreation values?

Chapter 8: Water entitlement and planning frameworks

Proposed objective: Victoria will have improved and responsive water entitlement and planning frameworks that enable us to better adapt to climate change.

8.1. The Discussion Paper proposes that:

'To ensure that our entitlement framework remains robust in the face of emerging pressures on resource availability and sharing, the Government will:

- **Support the actions to account for significant water uses and take active steps to understand and manage the impact of water use on other users and on the environment (e.g. domestic and stock use, stormwater)**
- **Maintain landowners' rights to domestic and stock water use in a way that does not undermine water resource management. To ensure we also protect the security of the system, and equitable access to water, it is proposed that a review of reasonable use is undertaken in consultation with the community**
- **Investigate the costs and benefits of unbundling for unregulated and groundwater systems beginning with a pilot study in northern Victoria for selected systems with high demand**
- **Consider opportunities for individuals to capture water during high flow periods in some systems within the sustainable limits of the resource. This would not increase the total volume of entitlements, although the reliability of entitlements may consequently increase**
- **Build transparency by investigating the merits of amalgamating various resource and system management instruments and policies into a single water resource instrument that would describe water sharing arrangements for a specific area or water system. This would include surface and groundwater system management rules and water resource management roles and responsibilities.'**

How strongly would you support this direction, and why?

8.2. The Discussion Paper proposes that:

'The government will enhance the existing water resource planning framework by:

- **Ensuring that Victoria's water security planning arrangements do not duplicate any requirements under Commonwealth legislation**
- **Ensuring that future planning considers Aboriginal values, recreational and liveability values for water**
- **Requiring the Department of Environment, Land, Water and Planning to annually review progress on the implementation of state planning commitments and compare observed water resource trends with the planning scenarios to inform resource management and grid investment decisions (see Chapter 9)**

- **Requiring a mid-term review of sustainable water strategies every five years informed by more detailed monitoring and reporting of progress against strategy actions**
- **Requiring the department to annually provide simple and easily accessible information on the drought preparedness of Victoria’s water sector to the community**
- **Ensuring that the community will be consulted on as part of planning for urban water security**
- **Ensuring that the temporary or permanent qualification of rights would only occur as a last resort.'**

What feedback or advice would you provide to the Government on this proposed direction?

8.3. The Discussion Paper proposes that:

'The Government will strengthen planning for environmental water through requiring sustainable water strategies to consider any new opportunities for environmental water recovery targets, taking into account the findings of Long-term Water Resource Assessments. Sustainable water strategies will rely on evidence based principles, priorities and community input.'

What comments do you have about this direction?

8.4. The Discussion Paper proposes that:

'The government will:

- **Require ongoing annual resource reporting and regular outlooks by rural water corporations, to support analysis of statewide water trends and enable individuals to make better informed decisions and analysis of statewide water trends**
- **Clarify the requirements for community engagement by water corporations**
- **Require rural water corporations to consider shared benefits when planning their water storage and operations management.'**

What comments do you have about this direction?

8.5. The Discussion Paper proposes that:

'Future sustainable water strategies will consider opportunities to enhance Aboriginal values of water.'

How supportive of this direction are you, and why?

8.6. The Discussion Paper proposes that:

'Future sustainable water strategies will consider opportunities to enhance recreational values of water.'

What comments do you have about this direction?

8.7. The Discussion Paper proposes that:

'In addition to the proposed directions for IWM planning outlined in Chapter 5:

- **The guidelines to be developed for the urban water strategies will be informed by the sub-regional and local IWM planning outlined in Chapter 5. The guidelines will be developed in the first half of 2016**
- **The urban water strategies will incorporate water corporation drought preparedness planning**
- **Urban water corporations will consider the potential for shared benefits during water resource and operational planning**
- **For Melbourne, government will work with Melbourne Water and the metropolitan water corporations to ensure that timing of these strategies and plans are aligned, streamlined and efficiently delivered.'**

What feedback or advice would you provide to the Government on this proposed direction?

8.8. The Discussion Paper proposes that:

'The Government supports the directions set out in the Victorian Floodplain Management Strategy to assist in planning for and mitigating flood risks, strengthening communities to

invest in projects to mitigate the risks of floods, and empowering communities to respond to and recover from floods. The Victoria Floodplain Management Strategy is currently being finalised, with a proposed release in early 2016.'

How supportive of this direction are you, and why?

Any other comments about Chapter 8: Water entitlement and planning frameworks?

Chapter 9: Realising the potential of the water grid

Proposed objective: Victoria's water grid and markets will help Victoria realise the greatest benefit from our valuable water resources. Victoria's water grid and markets will enable water to be accessed from a wider range of sources. Through the water market, users will be able to move water to where it is most valued and delay or avoid costly water supply augmentations. This market-based approach enables sharing water security benefits in ways that are fair, responsive and transparent. Our communities will be more resilient to changes in supply and demand, such as climate change and population growth.

9.1. The Discussion Paper proposes that:

'The Government will continue to refine the trading rules in irrigation areas to facilitate trade and enable farmers to manage their business needs.

The Government will work with the Murray-Darling Basin Authority to provide appropriate and timely information for northern Victorian water users about the risk of Choke congestion, and how trading rules are used to manage physical constraints in the southern Basin.'

What feedback or advice would you provide to the Government on this proposed direction?

9.2. The Discussion Paper proposes that:

'The Government will catalyse development of the water market in southern Victoria by establishing a five-year southern market trial from 2016–21. The trial will support the development of fit for purpose water markets in southern Victoria to share water security benefits more broadly, manage variability in water availability over time and across regions, and make better use of the grid.

The trial will not only consider market rules but also the role of the desalination plant, entitlement structures, allocation policies and storage and delivery changes.

A strategic partnership, led by the Department of Environment, Land, Water and Planning in partnership with water corporations, and other relevant parties will be established to reduce barriers to water trading.

A key component of this trial will be to build understanding of the grid through improved system information and modelling.

The Government will also continue to explore opportunities to further develop markets in the west, including the capacity to improve access to the grid.'

How supportive of this direction are you, and why?

9.3. The Discussion Paper proposes that:

'The Government will investigate the potential for broader water trade:

- **Within unregulated and groundwater systems**
- **Between these systems, where they are connected**
- **Between these and the regulated system, where this is connected.**

This direction is in the context of the strategic direction for unbundling in Chapter 8.'

What comments do you have about this strategic direction?

9.4. The Discussion Paper proposes that:

'The Government will commit to continuous improvement of the water market information and systems including:

- **Increasing transparency of the water market and water resources by making data on market behaviour, how water is held, and the distribution of water resources more accessible.**
- **Ongoing improvement of the Victorian Water Register to deliver streamlined, automated, online water entitlement and market transactions.**

This will assist in meeting water corporations' and water market participants' expected levels of service.'

What comments do you have about this strategic direction?

9.5. The Discussion Paper proposes that:

'The Government will establish a new centralised function based in the Department of Environment, Land, Water and Planning to provide oversight and a system-wide perspective of Victoria's water resources and inform strategic statewide investment decisions.'

How supportive of this direction are you, and why?

9.6. The Discussion Paper proposes that:

'The Government will establish a new centralised function based in the Department of Environment, Land, Water and Planning to provide oversight and a system-wide perspective of Victoria's water resources and inform strategic statewide investment decisions.'

What comments do you have about this strategic direction?

Any other comments about Chapter 9: Realising the potential of the water grid?

Chapter 10: Jobs, economy and innovation

Proposed objective: Victoria's water sector will deliver efficient and innovative water services to support jobs, growth and economic development across Victoria. Through strong governance, efficient service delivery, secure funding and innovation the water sector will support productive industries and investment, public health and wellbeing, and improve community and environmental outcomes across Victoria.

10.1. The Discussion Paper proposes that:

'Government will improve the performance of water corporations by:

- **Setting clear and unified expectations of performance and reflecting them through appropriate instruments, such as corporate plan guidelines**
- **Working with water corporations and the Essential Services Commission to develop clear, fit-for-purpose indicators that measure performance in terms of service delivery and value for customers and the community**
- **Undertaking a benchmarking exercise for Victoria's water corporations to encourage performance improvement and innovation.'**

How supportive of this direction are you, and why?

10.2. The Discussion Paper proposes that:

'Government will improve the governance of catchment management authorities by:

- **Implementing key directions in Our Catchment, Our Communities**
- **Communicating priority matters to catchment management authorities' boards**
- **Developing new Statements of Obligations for catchment management authorities under the Water Act 1989 and the Catchment and Land Protection Act 1994.'**

What comments do you have about this strategic direction?

10.3. The Discussion Paper proposes that:

'Government will ensure the governance arrangements for the Victorian Environmental Water Holder are efficient and effective in meeting its statutory environmental management objectives.'

What comments do you have about this proposed strategic direction?

10.4. The Discussion Paper proposes that:

'The government will:

- **Continue to review and refine charging arrangements for environmental water holders, and the way these are expressed in the environmental entitlements to ensure they are consistent with government policy**
- **Require environmental water holders and water corporations to negotiate service levels and charging arrangements in good faith, with negotiations undertaken within the context and timing of Essential Services Commission price review processes, any applicable intergovernmental commitments to which Victoria is a signatory, and relevant budgetary processes and constraints**
- **In developing charging arrangements between environmental water holders and water corporations, require parties to negotiate towards achieving agreement based on the following principles:**
 - **Prices for services to environmental water holders should be cost reflective**
 - **Prices should reflect the level of services received**
 - **Prices should be efficient in terms of providing signals for the efficient and sustainable use of water infrastructure**
 - **Prices should not deter environmental watering.'**

What feedback or advice would you provide to the Government on this proposed direction?

10.5. The Discussion Paper proposes that:

The water sector will continue to improve community engagement, involving the community and industry in how it plans and delivers its services.'

How supportive of this direction are you, and why?

10.6. The Discussion Paper proposes that:

'Government will promote diversity within our institutions by:

- **Requiring Victoria's water corporations and catchment management authorities to focus on diversity in executive leadership positions across the sector**
- **Partnering with the water sector and peak industry bodies to establish a Women in Water Leadership Program to train senior women in the sector**
- **Investing in Aboriginal participation through increased access to capability building opportunities, including sponsoring Aboriginal people in relevant study and training courses and funding water sector agencies to provide traineeships.'**

What comments do you have about this proposed direction?

10.7. The Discussion Paper proposes that:

'Government will clarify the role of the water sector in emergency response and recovery by providing an enabling environment under the all-hazards all-agencies emergency management framework that is consistent with its skills, resources and capabilities, and with relevant protections in place.'

What feedback or advice would you provide to the Government on this proposed direction?

10.8. The Discussion Paper proposes that:

'Government will strengthen its assurance framework with a suite of tools, systems, processes and training to ensure the sector can maintain business continuity, and is well equipped to mitigate the risks and challenges posed by extreme events and other emergencies.'

How supportive of this direction are you, and why?

10.9. The Discussion Paper proposes that:

'Government will consider options to facilitate third party access to water and wastewater infrastructure on transparent and commercial terms that protects community interests.'

What comments do you have about this proposed direction?

10.10. The Discussion Paper proposes that:

'Government will consider options to update and modernise the compliance and enforcement regime to ensure it remains effective and aligns with Victorian government policies.'

What feedback or advice would you provide to the Government on this proposed direction?

10.11. The Discussion Paper proposes that:

'Government will improve legislative and regulatory frameworks by identifying opportunities to reduce unnecessary red tape and streamline processes, including contributing to delivery of the government's commitment to reduce the burden of regulation by 25 per cent.'

What feedback or advice would you provide to the Government on this proposed direction?

10.12. The Discussion Paper proposes that:

'Government will:

- **Maintain the Environmental Contribution as a key tool to deliver the water plan's strategic priorities**
- **Implement the key recommendations from recent evaluations of the management of the Environmental Contribution to ensure its investment continues to align effectively with its legislative objectives, and enhance governance arrangements to ensure improved transparency, accountability and decision making.'**

What comments do you have about this proposed direction?

10.13. The Discussion Paper proposes that:

'Government will incentivise innovation in the water sector through:

- **Supporting collaborative programs where they deliver value, including the IWN program**
- **Establishing a Minister's Innovation Award to promote and recognise innovation in the water sector**
- **Ongoing participation in the CRC for Water Sensitive Cities**
- **Working with water corporations to make information more accessible to communities to assist them in being active participants in water management**
- **Working with local government to assess opportunities to more effectively share knowledge and expertise about innovative local scale solutions**
- **Ensuring expectations and measures for water corporations relating to innovation performance are effective.'**

How supportive of this direction are you, and why?

AILA supports an approach that incentivizes stormwater management as part of the open-space network, to support living infrastructure and make urban parks cool spaces that assist urban cooling and mitigation of heatwaves.

Any other comments about Chapter 10: Realising the potential of the water grid?

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