



# Department of Infrastructure

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Victorian River Health Strategy  
Catchment and Water Division  
Department of Natural Resources and Environment  
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Dear Sir/Madam

## **DRAFT VICTORIAN RIVER HEALTH STRATEGY – COMMENTS**

Thank you for the opportunity to provide comment on the Draft Victorian River Health Strategy, released by the Minister for Environment and Conservation in February 2002. Please find attached the Department of Infrastructure (DOI) response to the draft Strategy. (Attachment A).

The Department looks forward to contributing further to the development of the draft Strategy. For further information, please do not hesitate to contact to contact Adam Williams, Policy Officer from the Policy Development Unit on telephone (03) 9655 3392.

Yours sincerely

**Paul Jerome**  
Executive Director,  
Planning, Heritage, and Building Division

att:

**Draft Victorian River Health Strategy  
Comments from the Department of Infrastructure (DOI)**

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*The department generally supports the further development of the Strategy and makes the following comments:*

- The proposed strategy focuses on maintaining environmental (ecological quality) flows and balancing this with economic and social needs. While this is a commendable approach, there is scope for this work to be part of a much broader policy framework for water management across the State. The Government is currently developing a state-wide water recycling strategy and a water resources plan for metropolitan Melbourne, however there is no *overall* water management strategy for the State. Such a water management strategy for Victoria could provide a stronger policy direction and context for the strategies proposed.
- River quality is an important issue for the regional strategic work currently being undertaken by DOI, such as the Great Ocean Road Region Strategy. The proposed framework for indicators and targets (outlined on page 42) is very important as it provides both state-wide and regional indicators that can be used as part of a broader suite of indicators for regional work. It would be useful to articulate how this will fit into a broader framework for proposed State of the Environment reporting.
- The Strategy states that the proposed management framework will be based on a system of 'regional planning processes' developed within a State policy context (page 49). This management framework should be integrated with other planning processes, with both current and future regional strategic planning work being undertaken by DOI to be included as part of the regional planning process, as such processes have the potential to significantly impact on water quality issues.

Examples include:

- i) the project investigating implications of Irrigation/Mineral Sands Developments in the West and North-West of Victoria; and
- ii) the Great Ocean Road Region Strategy.

Both examples will influence future land use planning directions and outcomes for agriculture and urban development - two of the major influences on water quality.

- It is not clear whether the proposal (where large-scale land use changes are planned) to develop or amend the approval processes to take into account the likely impact upon existing water resource users and the environment (page 81), includes *all* Government development approval processes or just water development approval processes. Any changes to statutory approval processes under the *Environment Effects Act* or *Planning and Environment Act* should involve DOI in its capacity as lead agency for the land use planning system and development of regional strategies.
- Section 7.3.4 of the draft Strategy (pages 90-91) indicates that NRE will work in partnership with the EPA, industries, CMA's and other relevant groups to improve land management practices. Given its role in both land-use planning, ports, transport and local government issues, DOI should be one of the primary stakeholders involved in this process.

- To ensure that local and regional community expectations about Strategy implementation can be met, it is suggested that further consultation is required with local government, particularly when municipalities play a key statutory planning role in deciding on new land use and development.
- The recommendation that 'CMA's will facilitate the adoption of community agreed water quality priorities and regional targets outlined in the regional RHSs into local government Municipal Strategic Statements' on page 91 is misleading and should be re-worded to read:

*'CMA's will be encouraged to work in partnership with municipalities to facilitate the adoption of community agreed water quality priorities and regional targets outlined in the regional RHS's into local planning schemes'.*

- In determining an effective and transparent regional water resources monitoring and reporting partnership framework across Victoria (Page 136), the following issues will need to be considered:
  - The types and levels of information (local, state, regional) to be reported on;
  - Information format and accessibility issues;
  - Identifying community expectations;
  - Appropriate resourcing of data custodians;
  - The costs and benefits of assembling the required information;
  - Information reporting processes and frequency of reporting;
  - Information to be collated (existing information or new information);
  - Process of providing feedback from reported information into decision-making processes;
  - Information custodian issues related to reliability, accuracy and transparency;
  - Delivery mechanisms; and
  - The process by which information is prepared and publicly released.
- It is recognised that Aboriginal communities and the Aboriginal cultural heritage of Victorian River systems are an important components of all Victorian Rivers. Aboriginal cultural heritage issues associated with river health should also be acknowledged in the Strategy, with reference to appropriate actions. It is suggested that Aboriginal Affairs Victoria (AAV) in the first instance, be consulted about advice on this matter.

Date: 26/04/02