

**Addendum to:**

**Response to Barwon Water's 'water for our future' draft document**

Contact: Mary Lush (Secretary)

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19 January 2022



**Context:**

The Friends of Lorne (FoL) submitted its response on 9/1/2022.

Because we were not satisfied that we fully understood some aspects of water supply to Lorne we continued our work after the submission date. We now offer some points in addition to our original submission. We appreciate that due process may mean these comments cannot be considered in the context of the Barwon Water draft document, however we hope they have some value when considering future actions for Lorne's water supply.

For the convenience of readers we have added our original submission to the end of this document.

We thank Barwon Water for making so much information about water supply available online.

**Addendum:**

**Consultation for future water strategy**

Consultation with Lorne community Without claiming to know the mind of the Lorne community, FoL believes it is important that wider ranges of options be put to the community than those specifically picked out for Lorne in the draft document.

Demand In terms of demand, we are aware now that estimates of the per capita use of water in Lorne are puzzlingly high. We think this statistic is important in understanding use and in educating consumers, however we would like the basis of the estimates to be made clear. If correct, we need more detail about our patterns of water use.

**FoL believes that water restrictions and the price of water should be on the table as means of reducing demand.**

Supply FoL acknowledges Barwon Water's reservations about supplementing Lorne's supply from other rivers in the region. The reasoning could be expanded upon for the benefit of the community.

**In terms of supply, FoL would like recycled potable water, water tanks for new properties and retrofitted rainwater tanks to be on the table for consideration.**

## Natural environment of the St George River

	<p>We noted in our original submission that more attention had been paid to the environmental values of other rivers in our area than is paid to the St George River. We can now expand upon that point.</p>
Environmental value of the St George	<p>According to the information on the website of the Corangamite Catchment Management Authority, the St George River ‘is the only estuary in the Corangamite region which was listed as being in a <i>‘near-pristine’ condition in an audit of all estuaries in the region in 2003</i>’. We have not seen the report upon which this statement is based, but it is difficult to understand why a dammed river would be classified as pristine. We suggest that the statement is symptomatic of the lack of attention paid to the St George.</p> <p><b>Nonetheless, the statement can be read as evidence that the river has environmental value and that this must be managed carefully.</b></p>
Protection given to Erskine not given to St George	<p>The bulk water entitlement for Lorne was set in 1997 and has not, as far as we can determine, been revised since then. This entitlement contains a safeguard for the Erskine River, which is no longer used for supply, such that when flow drops below a pre-determined level, all of the flow must be ‘passing flow’.</p> <p><b>FoL suggests that a similar safeguard to that applied to the Erskine be instituted for the St George</b></p>
Cessation of flow in St George below dam	<p>FoL notes that cessation of spill-over when the reservoir drops below full is typically three months but can extend to eight (2015). We expect these durations are now longer because most of the data upon which they are based precede the 10% increase in the capacity of the reservoir in 2018.</p> <p>Option 2 for increasing supply, raising the Allen dam, would further prolong the no-spill period.</p> <p>Options involving ‘efficiencies’ will also prolong the no-spill period if a secondary consequence is lower water levels in the reservoir.</p> <p>In no-spill times the flow in the St George below the dam depends primarily on the Cora Lynn Creek. We have not found information about flow in the Creek.</p> <p><b>FoL concludes that we need a plan for management of the lower St George such that some flow between pools is maintained at all times to minimise environmental damage.</b></p>

**Original submission:**

**Response to Barwon Water’s ‘water for our future’ draft document**

Contact: Mary Lush (Secretary)  
[committee@friendsoflorne.org.au](mailto:committee@friendsoflorne.org.au)

9 January 2022



**Context:**

The purpose of the Friends of Lorne (FoL) is:

- To encourage and contribute to the planning and development of the environment within Lorne and its environs consistent with the need for preservation of the natural features, flora and fauna of the district
- To encourage and contribute to the planning, development and maintenance of community services and activities within Lorne and its environs consistent with the balanced needs of permanent residents, holidaying residents, campers and tourists.

FoL was founded in 1966 as the Lorne Planning and Preservation League, making it Lorne’s longest running community organisation. We act through newsletters, visitor information, citizen science and public meetings including Webinars

**Comments on the draft:**

**Consultation for future water strategy**

Community consultation and distribution list FoL’s current committee was unaware of the Phase 1 community engagement and Phase 2 community panel that were parts of the process used to generate the draft of the water strategy. We acknowledge that the fault may lie with us. We learned of Phase 3, the current feedback period, through networks. This is disappointing given that we corresponded with Barwon Water about environmental issues in the St George River in 2021.

FoL asks that it be added to Barwon Water’s distribution list for information about Lorne’s water supply.

Community panel vs wider consultation FoL is aware of favourable research findings about the use of randomly selected community panels. As used by Barwon Water in this instance, the panel was selected such that it would be representative of the census (2016?) populations in the regions Barwon Water serves. This method resulted in Lorne having two, anonymous members on the panel, a slight over representation by Barwon Water’s criteria.

FoL believes this community panel has limited value for Lorne. First, many of Lorne’s water users are not permanent residents. On the basis of number of billed water users, Lorne is probably under-represented on the panel. Secondly, although Lorne must compete for funding with other users, Lorne’s water supply is a standalone one. Some of the values and needs of Lorne users are irrelevant to

the other users and vice versa. Thirdly, and following from our second point, we don't believe that just two people should carry the burden of representing the range of opinion and values in the Lorne community.

FoL asks that future developments be open to the wider community

### Scenarios for the Lorne water supply

Supply	The basis for predictions about future supply of water is covered very well in the draft document and the concepts used in thinking about future needs are well illustrated in diagrams.
Demand	The basis for predictions of demand should be open to discussion in future developments.
Water supply to users, minimum and normal	FoL concurs with Barwon Water's objective that water for essential (but undefined) human needs should be available in even the worst of times. We agree that in 'normal' times water in addition to the minimum should be available, but have reservations about the 'agreed service level' that the water strategy aims to meet. Barwon Water's definition of the agreed service level is that there should be sufficient water to <i>'meet unrestricted demand at least 95% of the time'</i> .
Agreed service level may be too high	Demand for water in Lorne has a high, seasonal component reflecting both the weather and its population. Accepting that there is an environmental cost to the harvesting of water, and that users of the Victorian coast invariably rate the natural environment as its chief attraction, we suggest that the service level may be set too high. We should not for example, aim for a system in which restrictions only occur 2.5 times in the next 50 summers.
User values in coastal towns and hamlets	FoL suggests that the balance of values of water users in Lorne may differ from other Barwon Water customers. For example, many holiday home owners have values in common with owners in Kennett River, Wye River and Separation Creek who have rainwater tanks as their main source of supply. Dependence on rainwater tanks is seen as being consistent with their environmental objectives and is part of the neighbourhood character.  The options considered for Lorne's future water supply should be broader than the current list of four.

### Natural environment of the St George River

Environmental constraints and Barwon Water	Barwon Water acknowledges that the required minimum environmental flows in the Moorboolool and Barwon rivers are not being met and that consequently they are water stressed. Environmental 'constraints' limit the removal of water from the Anglesea borefield. In Apollo Bay there are limits on the removal of water from the Barham River during summer.
Absence of constraints for St George River	The environmental consequences of water use in Lorne, however, are not documented in the draft. Barwon Water is entitled to withdraw 510 ML from the St George River which feeds the Allen Reservoir, Lorne's only source of water. There do not appear to be any seasonal constraints to this withdrawal or any requirement to maintain a minimum flow in the river for environmental reasons.

Little evidence of Barwon water protecting Lorne environment

In May 2021 and extending to the end of the year, FoL corresponded with Barwon Water about aspects of the environmental health of the St George River. Barwon Water was apparently unaware of ‘unusual/extraordinary occurrence[s]’ documented by the Corangamite Catchment Management Authority at the St George estuary, which would have been lethal to some aquatic life. The event, which was in 2015/2016, was caused directly or indirectly by low flows. In addition, Barwon Water has to date rejected several suggestions about monitoring of platypus, a threatened species present in the Allen Reservoir.

Although the draft document acknowledges that options in Lorne may be constrained by environmental considerations, our direct experience does not support the claim that Barwon Water ‘*actively protect[s] and improve[s] water for the environment.*’