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Dear Charles

WATERWISE LAND DEVELOPMENTS CRITERIA

The urban development industry is a key contributor to sustainable development practices in Western Australia. We acknowledge that water sensitive urban design and minimising water use within developments is an integral part of achieving sustainable communities.

As an outcome of the recent briefing to industry, I advise that there was in principle support from our membership for the Water Corporation's initiative to implement a voluntary Waterwise Land Developments program. Both industry and UDIA believe the program will be a positive step toward acknowledging projects and their developers for implementing water saving technologies and initiating innovative ways to save water within developments.

Following on from the meeting UDIA has a number of suggestions as to how the Waterwise Land Developments program can be improved to make the initiative more attractive to industry. These suggestions are aimed at ensuring the best possible outcomes for this program for the industry, all levels of government and the community as a whole.

LOCAL AUTHORITIES

The main concern for UDIA members in respect to seeking a Waterwise Land Developments program is the need to obtain support from local authorities. When implementing measures to address the waterwise criteria, developers will have to seek approval from the relevant local authorities. This may prove difficult as some of the criteria refers to areas that the local authority will be responsible for approving and/ or maintaining. These areas include: road verges, median strips, entry statements and public open space.

It would be most effective if the Water Corporation liaise with local authorities in the early stage of developing the Waterwise Land Development Criteria. This would ensure that the final criteria would be acceptable to both the development industry and local authorities.

TARGETS

UDIA recognises the need to contain the amount of phosphorus and nitrogen that infiltrates the ground water on development sites. However, including specific targets such as “Water infiltrating to groundwater shall be a minimum 60% lower in total phosphorus” is not appropriate to some developments. For example, if a development does not initially have a high percentage of phosphate, there is no need to be reducing the level by 60%.

UDIA suggests that the targets are structured to be less specific. For example it could be stated that if phosphate is at or above a certain level, then these targets apply. This would ensure that Water Corporation officers assessing developments against the Waterwise criteria will not mark down certain developments because they do not have a model to decrease phosphate by 60% when this is not necessary.

The same concerns have been raised in regard to the targets for water leaving the site as surface water. UDIA understand the need to monitor the levels of phosphorus, nitrogen and other chemicals or pollutants leaving a site, however it may not be appropriate to include such specific targets in the criteria.

WATER QUANTITY

In the section on Water Quantity the proposed criteria refers to groundwater levels not falling or rising enough to impact on constructed assets or wetlands. It would be appropriate in this context to define what type of wetland is being referred to in relation to the criteria. For example does this section refer to protected wetlands or all wetlands on the site?

ROAD VERGE AND MEDIAN STRIP TREATMENTS

As mentioned previously, it is essential for Water Corporation to get the support of local authorities for the implementation of the Waterwise Land Developments Criteria. This is particularly relevant in relation to the section on Road Verge and Median Strip Treatment.

The criteria states that all road verges and median strips included in the development shall include a combination of porous paving and water efficient low profile garden beds comprising 1 drop plants and water efficient street trees. Developers agree that median strips and road verges would be more water efficient if these measures were taken. However, considering that the relevant local authority takes responsibility for maintaining verges and median strips, it is important to implement criteria that will be approved by the local authority. Products which are in need of extra care and maintenance are unlikely to be approved by local authorities.

A possibility that has been suggested by developers to overcome local authority issues is that a percentage of road verges rather than all road verges within a development conform to the criteria. This could be with the view to increasing that stated percentage over time. Another option is to offer a waterwise verge treatment package to consumers as an option when purchasing a lot rather than it being mandatory.

Further to this, the section on entry statements and public open space raises similar industry concerns. Local authorities need to agree during the development of this set of criteria that they will approve the use of materials such as those outlined in attachment 1 of the criteria.

CONCLUSION

UDIA supports the implementation of a voluntary Waterwise Land Development program on the basis that the Water Corporation liaises with local authorities to ensure their support. The successful implementation of the program is dependant on local authority approval.

Further to local authority support, it is important that Water Corporation and the development industry work together to ensure that implementation of the Waterwise criteria is cost efficient for consumers. This will also involve some education for consumers about the benefits of buying into a Waterwise Development.

Thank you for the opportunity to work with the Water Corporation on the Waterwise Land Developments Criteria. UDIA look forward to working with the corporation to achieve the best waterwise outcome for the community, property industry and all levels of government.

Yours sincerely

Marion Fulker
EXECUTIVE DIRECTOR