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Mr Daniel Ellis-Jones
Sustainable Buildings Officer
Department of Housing and Works
108 Adelaide Terrace
EAST PERTH WA 6004

By email: Daniel.ellis-jones@dhw.wa.gov.au

Dear Daniel

Re: 5 Star Plus Stage 2

The Urban Development Institute of Australia (UDIA) (WA) is pleased to offer the following comments on the issues paper that examines the introduction of **5 Star Plus Stage 2**. UDIA (WA) is the peak body representing the property industry in Western Australia with members engaged in a range of disciplines including land development, planning, architecture, urban design, infrastructure and engineering.

Overview

The property industry is actively engaged in the delivery of sustainable development to new communities and the industry fully supports the intentions of 5 Star Plus Stage 2. While 5 Star Plus Stage 2 relates to building codes and regulations, many of our members deliver house and land packages or are engaged in the provision of essential infrastructure to developments, including infrastructure for third pipe for alternative or greywater systems.

Whilst the commitment of the industry to these sustainability initiatives is strong, a key issue for the industry is clarity both within Departments and across whole-of-government regarding policy priorities. An example of this is third pipe which is being strongly promoted by some government agencies, however in some geographical areas appropriate water allocations are unlikely to be given and there is a lack of clarity about appropriate infrastructure specifications.

Some key Departments regard third pipe as being in pilot phase, others are seeking to make it mandatory. Unfortunately there are Developers who have invested in third pipe technology only to find that its use is prevented by a Government authority. Priority should be given to ensuring that there are no conflicting policies that is, water allocation vs third pipe, to ensure that the investment by developers results in sustainability improvements not redundant infrastructure.

The following sections respond to Performance Requirement / Deemed to Satisfy issues detailed in the 5 Star Plus Stage 2 Issues Paper.

PR/DTS4 – Alternative Water Supply Use Capacity

UDIA considers more work needs to be done on the costings of pre-laid plumbing at \$300 - \$400 as this does not allow for the builder's margin, which will inflate the real cost. We would also like a better understanding of the costs for a two storey home which will be higher.

UDIA is sensitive to the impact of these costs, as declining affordability is a major issue for Western Australia. While the pre-laid plumbing costs of themselves are relatively low, the cumulative impact of additional costs such as these becomes prohibitive for households at the lower end of the market and will serve to prevent them moving into the market. UDIA is concerned that the householder will be required to pay for the infrastructure without any assurance from Water Corporation that it will be utilised.

PR/DTS5 – Grey Water Use Capacity

Industry needs assurance that the required plumbing will actually be connected before the costs of pre-laid pipe work are imposed on new home builders.

Minimum lot size for pre-laying of greywater

UDIA suggests the minimum lot size be 420 sqm or less. That is, the requirement should apply to all lots R30 or greater with a lot sized 420sqm or less as this would be easier to govern and for planning in sub-divisions.

PR/DTS6 – Alternative Internal Water Supply

DHW is mandating the requirement for an alternative internal water source on houses that have more than 2 WC's or showers. What is the evidence that these homes use more water? In two storey homes, at least two WC's are currently required (one on each level) which is necessary to allow for ageing in place and for people with varying abilities. UDIA questions the water savings from this assumption as it is likely that a dwelling with more than 2 WC's may in fact have low occupancy, given the trend to smaller households in WA.

PR/DTS7 – Alternative External Water Supply

This requirement may be difficult to comply with, particularly where it relates to specific geographic areas and future connection to a bore. Certain areas in Perth and Peel are already fully subscribed for bores which renders future connection impossible to achieve. The use of bore water may be in conflict with Department of Water objectives for groundwater in WA. In addition, connection to a grey water recycling system can be expensive, despite the rebate, which suggests a need for an affordable system to be set as the minimum standard.

Potential for using large amounts of scheme water

Figure 5 does not support the assumption that large lots are likely to use more water as the data indicate a 1001 – 1200 sqm lot uses less scheme water than 401 – 800 sqm lots. UDIA also questions the strategy for DHW to determine high water use via lot size to encourage developers to provide third pipe supplies, as developers are already installing third pipe capacity with no uptake from Water Corporation. The lack of commitment with third pipe lies with Water Corporation, not the development industry.

Conclusion

UDIA supports the principle of water efficiency measures in dwellings to reduce the demand on potable water for certain household uses. Key issues for the development industry are:

- The cost impost on new home builders, particularly first home buyers, and the implications for housing affordability
- A current lack of commitment on the part of Water Corporation to support third pipe installation in new estates
- The needless cost impost on land purchasers where third pipe infrastructure is put in place under the guidance of Water Corporation but not subsequently connected to the system
- Guarantees from government that the requirement for pre-plumbing will not be redundant as government should understand the impact of incremental charges such as pre-plumbing on affordability
- More substantive data collection done on the assumptions underlying the performance requirements, particularly the relationship between lot size and water usage and the number of WC's and bathrooms and water usage
- This policy should not conflict with Department of Water policy, by encouraging the use of bore water as an alternative external source in areas where DoW will not issue bore licences
- The requirements for greywater should be made clearer and supported by policy that makes implementation assured

We trust you will find these comments useful.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Debra Goostrey', with a stylized flourish at the end.

Debra Goostrey
Chief Executive Officer