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Mr Richard Theobald  
Manager Water Unit  
Environmental Health Directorate  
Department of Health  
PO Box 8172  
Perth Business Centre WA 6849

Attention: Alisha Ryans-Taylor

Dear Ms Taylor

**DRAFT ALTERNATE WATER SUPPLY GUIDELINES – STORMWATER AND RAINWATER /  
DRAFT GUIDELINES FOR THE USE OF RECYCLED WATER IN WESTERN AUSTRALIA**

The Urban Development Institute of Australia (UDIA WA) would like to thank you for the opportunity to provide comment on the above draft documents. UDIA has a keen interest in these documents as UDIA is the peak industry body representing the land development industry in Western Australia and our members play a significant role in third pipe and alternative water system supply design and project inception in Western Australia. We are a membership organisation with members drawn from the engineering, environmental, planning, urban design, finance and legal sectors. One of the principal objectives of UDIA is to promote innovation in the creation of sustainable communities in Western Australia and we endeavour to ensure that requirements placed on development are feasible without compromising desired outcomes.

UDIA is aware that individual members have provided feedback on the documents and we endorse their stated positions. We also support the use of the *Australian Guidelines for Water Recycling: Managing Health and Environmental Risks (Phase 1) 2006* to bring Western Australia in line with the national standards.

UDIA welcomes the guidelines as developers are frequently faced with obstacles which impede innovation when proposing the use of alternative water sources in developments with reported cases of installed third pipe systems for non-potable use being closed off because of a risk adverse response to innovation. This has negative implications for the cost of land and housing and affordability is severely impacted as a developer is forced to recover the costs of expensive, un-utilised infrastructure from purchasers.

General comments in relation to the two documents follow.

#### **DRAFT ALTERNATE WATER SUPPLY GUIDELINES – STORMWATER AND RAINWATER**

1. The requirements for a number of controls seem excessive for non-potable use and their application should be re-considered. For example,
  - roof water monitoring after each storm event
  - treatment levels for water used in water features
  - the use of warning signs
  - monthly tests on tank water for irrigation of a park
2. The requirement for alternative water used for bathing and third pipe to comply with Australian Drinking Water Guidelines 2004 is excessive and does not conform to the National Environment Protection and Heritage Council requirement. Reconsideration of this requirement is recommended.
3. UDIA is not clear what jurisdiction the Department of Health has to impose the stated requirements on proponents (p.40) for non-potable uses. Rainwater tanks are approved by local governments and water quality plans by the Department of Water.
4. The reference to and potential application of the draft Public Health Act 2008 is not supported as it is still in development and may be for some considerable time.
5. UDIA does not support a number of expensive undertakings cited in the document. These will add considerable costs to developments, for example continuous on-line monitoring requirements for disinfection for medium exposure end uses and the production of a water quality management plan for low risk end uses. The Department of Health should be cognisant of the impact of such requirements on housing affordability particularly as they are excessive to the level of risk involved.

#### **DRAFT GUIDELINES FOR THE USE OF RECYCLED WATER IN WESTERN AUSTRALIA**

1. The definition of recycled water and all definitions referred to in the document should be consistent with the National Guidelines.
2. The document needs greater clarity around the scale of a project requiring a recycled water quality management plan and understand the impact of such a requirement on housing affordability.

I trust you will give due consideration to the above comments. I would also like to suggest that the Department of Health include UDIA on its distribution list for public comment of any draft documents that will impact on the land development industry. We like to keep our members abreast of the latest policy positions of all government departments and industry feedback would add value to your own review processes.

UDIA also looks forward to hearing from you regarding the possibility of a second workshop / focus group to discuss the draft documents. Should you need assistance in contacting members who wish to attend, please do not hesitate to contact this office on 9321 1101.

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