

8th February 2017

Property Council of Australia
ABN 13 008 474 422

Mezzanine Level, Australia Place
15 - 17 William Street
Perth WA 6000

T. +61 8 9426 1200
E. info@propertycouncil.com.au

propertycouncil.com.au
@propertycouncil

Ms Gail McGowan
Director General
Department of Planning
Locked Bag 2506
Perth WA 6001

Dear Gail,

Submission on Draft Government Sewerage Policy

The Property Council of Australia would like to comment on the need for the current review of the government's sewerage policy to take a more strategic view and address new solutions to providing essential service infrastructure.

The focus of this submission is to recommend that the finalisation of the policy should:

1. Give greater recognition to the role of private wastewater service providers; and,
2. Not require connection to reticulated sewer as a standard condition for ALL subdivision approvals of industrial sites as a starting point ie. low effluent generating type industries can be allowed in "dry" type industrial estates as well as on site disposal of effluent using state of the art technologies.

Across Australia all levels of government and industry are struggling to address the need for alternative infrastructure arrangements. Governments should therefore be alert to every opportunity to introduce policy reforms that enable infrastructure upgrades or new services.

The review of this policy is a timely opportunity for the WA planning authority to give greater recognition to the role of private wastewater service providers rather than the current review which has focussed on the criteria and densities to allow unsewered development.

The Water Corporation is currently the largest water service provider and, thus, there is a widespread assumption that the Water Corporation, local government, and industry participants only provide water services such as the Busselton and Bunbury Water Boards. This is no longer the case. Licensed service providers are likely to have an increasingly important role in the delivery of wastewater services (including water recycling).

Private wastewater schemes provide an alternative funding source for service infrastructure and a means of conserving water through recycling schemes. Private wastewater service providers, are now a real option particularly for constrained sites such as hills locations but also in other situations. This should be more clearly recognised and highlighted in the policy.

A key purpose of the policy (in the Introduction and the policy provisions) should have been to explain the emerging role of private service providers, how the systems work, suitable locations for decentralised systems, and rezoning/application requirements.

In addition, the policy does not address dry industrial estate where generated flows are expected to be low and therefore these types of subdivision could be approved without reticulated sewer. Instead the current draft policy requires as a starting point that all industrial estates should be connected to reticulated sewer. Typically, “dry type” industrial areas that are transport related are mainly set aside for lay down or storage, have minimal amenities and generate little effluent which can easily be handled using state of the art technologies.

In summary, the deregulation of the water service industry deserves more attention; and, not all industrial sites are the same.

If you have any further questions, or would like further input in the finalisation of this policy please do not hesitate to contact our Deputy Executive Director Alix Rhodes on arhodes@propertycouncil.com.au or 08 9426 1204.

Sincerely

A handwritten signature in black ink, appearing to read 'L. Iacomella', written in a cursive style.

Lino Iacomella
Executive Director – WA

cc. Eric Lumsden, PSM, Chair – Western Australian Planning Commission