

Schedule of Submissions – Draft Local Planning Policy No 17

Full copies of submissions are available to Councillors on request.

| | Submitter | Summary of submission | Officer comments / recommendations. |
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| A. | Department of Planning Great Southern Region P.O. Box 1108 Albany WA 6331 | <p>1. The dot points in Section 7.2.1 appear to contradict one another.</p> <p>The last paragraph within this section implies that roof areas above 50m² need not collect, store and plumb water run-off.</p> | <p>Upheld, modifications proposed.</p> <p>Clarification of clause 7.2.1 is recommended ensuring that it is clear that the policy requires all new residential buildings, all extensions greater than 50m² and all extensions that include a toilet, water heater or a laundry are required to provide a rainwater tank.</p> |
| B. | Great Southern Development Commission P.O. Box 280 Albany WA 6331 | <p>1. The broad aim of water harvesting and grey water re use is strongly supported.</p> <p>2. The Policy may only have a limited impact on easing water supply capacity as a limiting factor for residential growth. Water capacity limitations are at peak times in summer, a time when rainwater tanks are also not full.</p> <p>3. The Shire may wish to consider whether the policy, given its mandatory nature, needs fine tuning to accommodate the cost implication it could have on residential construction.</p> | <p>Noted, no changes are recommended as a result of these comments.</p> <p>Even a small impact on reducing water usage may assist in negotiations with the Water Corporation when discussing future subdivision and development.</p> <p>There will be cost implications mandating rainwater tanks. However, the cost of tanks and their plumbing is reasonably minor and will provide cost savings into the future in reduced water bills.</p> |
| C. | Tom Stevens H+H Architects P.O. Box 5427 Albany WA 6332 | <p>1. 5000l is recommended as a good size for the tanks.</p> <p>2. Tanks should be plumbed to the washing machine and not laundry trough.</p> <p>3. Don't plumb it to the hot water service as people may drink the shower water.</p> <p>4. Don't include the kitchen waste water in any grey water reuse scheme as kitchen water is considered 'black water'.</p> <p>5. You should include the types of suitable irrigation systems for recycled grey water.</p> | <p>Noted and Upheld, modifications proposed</p> <p>A larger minimum tank size of 4500l has been recommended in response to submissions lodged and further research into standard tank sizes. This is investigated further in the Council report.</p> <p>The policy has been amended to remove reference to plumbing to the hot water service in response to Department of Health policy.</p> <p>Reference to kitchen water as grey water is to be removed, it is considered 'black water' and is plumbed to the sewerage system.</p> |

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| D. | Department of Water P.O. Box 525 Albany WA 6331 | <ol style="list-style-type: none"> 1. The Department supports the Policy and in particular the mandating of rain water tanks. 2. Modeling has shown that variation in rainfall caused by a drying climate has little influence on the yield obtained from water tanks. 3. In addition to the benefits identified in Section 1 – Background the draft Policy will also: <ul style="list-style-type: none"> • Increase security of water for individual lot owners through decentralized supply; • Augment additional water supply infrastructure deferring the need for additional water supply and distribution infrastructure; • Reduce the requirement for storm water infrastructure in new development; • Reduce energy and greenhouse emissions. 4. DAFWA should be consulted as to appropriate sizes for rainwater tanks. 5. Section 7.2 is worded in a confusing manner. 6. Section 8.1 relates to grey water recycling systems. Reuse from kitchens is not recommended. 7. Whilst the Shire is not considering mandating grey water reuse systems the Department recommends that the Shire should introduce additional incentives such as waiving of fees, etc 8. The Department encourages the Shire to consider drafting a Policy on Public Open Space. | <p>Noted and Upheld, modifications proposed</p> <p>Additional information to be added to the background part of the Policy in response to the issues raised by the Department of Water.</p> <p>DAFWA were consulted regarding tank size, and this resulted in the recommended increase to minimum tank size to 4500l.</p> <p>Section 7.2 is to be clarified and reworded.</p> <p>Reuse from kitchens for grey water systems is to be removed.</p> <p>In regard to additional incentives for grey water reuse systems, there are no Shire fees involved or approval process. This lies with the Department of Health (DOH) and is largely a State matter. There is little the Shire can do to provide incentives for grey water reuse systems besides raising their profile and encouraging their use (as such as through this Policy).</p> <p>Once the DOH approve more grey water reuse systems and their cost comes down and administrative burden is reduced there will be more scope to support these systems.</p> <p>A policy on Public Open Space (POS) is a separate exercise and may need to be considered on water conservation and other grounds.</p> |
| E. | Peter Duncan Manager Development Services Shire of Plantagenet | <ol style="list-style-type: none"> 1. Shire should be congratulated on this initiative. 2. Section 7.2, point 2, the Department of Health will not support the plumbing of a tank to the hot water service. 3. Pity the Policy cannot go further to require that scheme water is fed into a 20,000litre tank or similar that is filled with rainwater. Scheme water could then top up the tank when it falls below a certain level. | <p>Noted and Upheld, modifications proposed</p> <p>Section 7.2 is to be clarified and reworded and reference to plumbing to a hot water service removed.</p> <p>Mixing scheme water and rain water in a single systems as described would be a sustainable methods of water supply. At this stage the DOH would not support such as system.</p> |

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| F. | Ms Michelle Vojtisek Department of Health P.O. Box 8172 Perth WA 6849 | <ol style="list-style-type: none"> 1. The Department of Health (DOH) supports the use of rainwater tanks and greywater recycling systems for all non-potable uses. The Shire's initiative is in accordance with the State Water Strategy by encouraging alternative supplies of water. 2. There is no mention of backflow fittings, this should be mentioned as cross connections and back flow events pose the highest risk in reticulated scheme systems. 3. A reference to regular maintenance and upkeep of water tanks should be included in the policy. 4. Section 7.2.2 refers to hot water services. Hot water services, unless connected to a dedicated laundry tap, are deemed to be drinking water service. 5. It is also recommended that Council consider minimum management and maintenance requirements for grouped dwelling developments mentioned in Section 4. | <p>Noted and Upheld, modifications proposed</p> <p>Additional reference to backflow fittings is recommended.</p> <p>Reference to regular maintenance of rain water tanks is already addressed in section 10 of the Policy.</p> <p>Section 7.2 is to be clarified and reworded and reference to plumbing to a hot water service removed.</p> |
| G | Development Services Branch Water Corporation P.O. Box 100 Leederville WA 6902 | <ol style="list-style-type: none"> 1. Corporation supports the adoption of the draft policy and all efforts to conserve domestic water supplies. 2. A list of other methods of water conservation is appended to the submission for Council's consideration. | <p>Noted, no changes are recommended as a result of these comments.</p> <p>The policy explores all relevant and practical possibilities for water savings when proposing new residential development. The Water Corporation suggestions generally apply to subdivision.</p> |
| H | Water Efficiency Projects Water Corporation P.O. Box 100 Leederville WA 6902 | <ol style="list-style-type: none"> 1. Thanks the Shire for the request to extend the Rainwater Rewards program to the Shire of Jerramungup and commends the Shire on the initiative. 2. Rainwater Rewards program was developed as a measure to reduce water use in the Lower Great Southern Scheme. Although the Shire of Jerramungup is immediately to the east of the Scheme area it is not served by the Lower Great Southern Scheme, rather by local dams and bore fields. 3. The Corporation makes decisions around the individual scheme requirements and they are unable to extend the program to the Shire. 4. Registering as a Waterwise Council is encouraged. | <p>Noted, no changes are recommended as a result of these comments.</p> <p>Whilst the Water Corporation has been supportive of the measures proposed, no financial assistance has been forthcoming. Further approaches to the Water Corporation for financial assistance for the installation of rainwater tanks are recommended in the body of this report.</p> <p>Whilst some kudos is gained from becoming a Waterwise Council, there are no financial benefits or incentives that arise from such registration.</p> |