

File Ref: 10/60640  
Your Ref:  
Enquiries: Nicola Hoey

25 November 2010

Urban Water Inquiry  
Productivity Commission  
LB 2 Collins Street East  
MELBOURNE VIC 3165

Dear Sir/ Madam

**SUBMISSION: PRODUCTIVITY COMMISSION ISSUES PAPER – AUSTRALIA'S URBAN WATER SECTOR**

The City of Wanneroo would like to thank you for the opportunity to comment on the above Issues Paper and congratulates the Commission for recognising this issue at a National Level.

**Background**

The City of Wanneroo (the City) is situated 22 kilometres north of Perth and with an area covering 685 square kilometres it is one of the oldest and fastest growing regions in Western Australia. Over the next two decades, the population of the CoW is expected to increase from approximately 150,000 to 300,000 people. In order to accommodate this significant increase, areas such as the East Wanneroo sub regional structure plan area; the Alkimos Eglinton District Structure Plan area and the Yanchep-Two Rocks area; are proposed to be developed for residential, commercial and industrial uses. These changes in land use, combined with the impacts of a drying climate, population growth within the Perth region generally and the continuing requirements for water for horticulture industries, are putting pressure on the water resources within the City.

**Submission**

The City would like to provide support to the Department of Water WA (DoW) submission and provide further information from a local perspective.

*Stormwater*

It is important that stormwater be considered a separate water source to wastewater and should be defined as water generated from rainfall events and not included in the overall wastewater definition. This is especially important in Perth, where groundwater is the primary urban water source, and rainwater has the potential to recharge the superficial aquifer, either prior to runoff commencing or throughout the runoff's journey in the catchment, with much less treatment than would be required for more traditional wastewater sources, such as sewage.

Urban stormwater is an important source of recharge to shallow groundwater, which supports consumptive use and groundwater dependent ecosystems and should be incorporated in any proposed national urban water reform through integrated water management practices.

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This will be critical for the new urban growth areas currently being planned in the City of Wanneroo, as they are dependent on the groundwater supply for drinking water and minimal quantities of groundwater will be supplied for any other uses (such as irrigation of active open spaces). A significant chain of groundwater dependent wetlands is also present in the City and maintenance of the groundwater level will be essential to the survival of these highly valued systems in a changing climate.

Maximising stormwater recharge and ensuring integrated water management practices (including stormwater recharge and reuse) are delivered into new urban areas should be the priority for areas such as the City of Wanneroo in the Perth Metropolitan Area.

#### *Cost implications to local government*

Much of the drainage and stormwater infrastructure delivered in new areas is likely to be managed by the local government authority. This will result in significant cost to growth local governments, however, the City recognises that the cost of polluting water resources or not using them effectively will result in significant cost to the wider community in the long-term.

It is also recognised that traditional development standards still require the provision of drainage and stormwater infrastructure and that the cost of providing more sustainable infrastructure is not significantly different.

However, any infrastructure delivered by a wastewater service provider (such as third pipe, non-drinking water source systems) is likely to result in a cost to local governments for the treatment and delivery of water, for example for irrigation of active open space. This is worthy of note as it is a cost that does not currently occur and may result in some local governments paying for water, where others will not. This may result in inconsistencies within the community and services delivered and as such should be considered in any urban water reform proposal.

#### *Approval process for alternative water sources*


A National Standard covering alternative water source solutions such as third pipe systems should be considered as part of urban water reform. Public health standards, for example, differ across the country, which can increase approval times and make new, more sustainable technologies difficult to implement.

#### *Reduction in water use*

To ensure water use in urban areas is kept at a sustainable level, it will become important to reduce individual water use over time as the population grows and the climate changes. It is recommended that a national programme be developed as any part of reform to allow for consistent reduction of water use across Australia.

Please contact the City's Coordinator Environmental Planning on (08) 9405 5523 should you wish to further discuss any of the above.

Yours sincerely

 Daniel Simms

**CHIEF EXECUTIVE OFFICER**