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Dear Commissioner

Queensland Urban Utilities

17 November 2011

We refer to our letter dated 15 November 2011 and now **enclose**:

1. Original signed Statement of Paul Belz, dated 15 November 2011.

If you have any queries, please do not hesitate to contact us.

Yours faithfully



Our reference
JKC EMGR 07 2029 6139.

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Statement of Paul Belz

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I, PAUL BELZ, state:

Role and Position

1. I am the General Manager for Planning for Queensland Urban Utilities (QUU). I am responsible for strategy and planning of water and wastewater systems, environmental compliance, reporting, treatment plant design and land use planning and development assessments for QUU. Within QUU's emergency framework, I am an emergency manager. I was the emergency management team leader during the flood event.
2. This statement is in response to the Requirement to Provide Statement to Commission of Inquiry (**Requirement**) received by Blake Dawson lawyers (solicitors for QUU) from the Queensland Floods Commission of Inquiry (**Commission**) dated 8 November 2011.
3. I have previously provided statements to the Commission, such statements being dated 21 October 2011 and 25 October 2011.

1. Whether, in his opinion, or alternately, in the opinion of QUU, any standards, policies or guidelines that regulate sewerage infrastructure (including, but not limited to, the Department of Environment and Resource Management planning Guidelines for Water Supply and Sewerage) ought be reviewed to ensure the infrastructure is appropriately flood resilient.

Department of Environment and Resource Management Planning Guidelines for Water Supply and Sewerage

4. I refer to QUU's second submission (undated) to the Commission in regard to stormwater management, in particular, paragraphs 14 to 17.
5. During wet weather events, stormwater flows within sewers may substantially increase, to a point where QUU's wastewater systems overflow. If stormwater flows cannot be reduced through increased community and industry education or statutory measures (in the context of illegal stormwater connections), the Department of Environment and Resource Management Planning Guidelines for Water Supply and Sewerage (**DERM guidelines**) ought be reviewed in order to ascertain whether the DERM guidelines could be modified to better address stormwater management issues in areas with known wet weather and stormwater overflow.

Development in flood plains

6. I refer to QUU's second submission (undated), in particular, paragraphs 19 to 21.
7. By way of example, the National Construction Code of Australia and the Queensland Plumbing and Wastewater Code ought be reviewed in order to ascertain whether they could be modified to better address private development and building issues in areas with known wet weather and stormwater overflow, including through options such as sealed systems.

Illegal connection of private stormwater systems to wastewater systems

8. I refer to QUU's second submission (undated), in particular, paragraphs 22 to 38.
9. Any review of standards, policies or guidelines such as the DERM guidelines and the National Construction Code of Australia should be complemented by a review of relevant legislation including the *Plumbing and Drainage Act 2002* and *Water Supply (Safety and Reliability) Act 2008*, to better address flood resilience and stormwater management issues arising from illegal stormwater connections.

- 2. With respect to any standards, policies or guidelines identified in item 1:**
a. the specific provisions that are suggested to be reviewed;
b. the reason why the provisions should be reviewed; and
c. any suggested amendments to these provisions.

Department of Environment and Resource Management Planning Guidelines for Water Supply and Sewerage

10. Generally, the DERM guidelines do not address flood resilience. However, specific provisions that could be reviewed are contained in Chapter 7 (options for service provision) paragraph 5.5.4 (infrastructure sizing – sewerage).
11. The provisions ought be reviewed if stormwater flows cannot be reduced through increased community and industry education or statutory measures (in the context of illegal stormwater connections).
12. By way of example, a suggested amendment would be a requirement that local government planners and developers in areas with known wet weather overflow or stormwater issues provide sewerage upgrades for new developments beyond what would ordinarily be required, for example through the use of sealed manholes and construction of infrastructure above flood levels.

Development in flood plains

13. I understand that the Australian Building Codes Board (**ABCB**) is currently developing a standard governing building in flood-prone areas, for inclusion in the National Construction Code of Australia. The ABCB should ensure that the new standard addresses the impacts of private development on the flood resilience of wastewater infrastructure.
14. The Queensland Plumbing and Wastewater Code, which does not address flood resilience, should be subject to a similar review.
15. Private development in flood plains and potential flood inundation areas pose a number of local impediments to the provision of wastewater services. Therefore, it is important that the type of development and its location is carefully considered and, where possible is minimised, in flood plains and potential flood inundation areas.
16. By way of example, in order to mitigate the risks of wastewater overflow, the proposed ABCB standard should require sewerage with sealed and pressure wastewater systems and the location of new critical infrastructure above peak maximum flood levels. However, such a requirement would be subject to funding constraints. Additionally, it should be recognised that most wastewater systems operate by gravity flow and therefore are generally situated at the lowest points in the catchment.

Illegal connection of private stormwater systems to the sewerage system

17. I refer to QUU's second submission (undated), in particular, paragraphs 22 to 38, and the legislative provisions discussed there, and in general terms to the *Plumbing and Drainage Act 2002*.
18. A significant source of stormwater infiltration into QUU's wastewater system is believed to be from illegal stormwater connections to private sewers that are in turn connected to QUU's wastewater systems. These connections increase the likelihood of wastewater systems becoming overloaded and/or overflowing during wet weather and/or flood events.
19. By way of example, noting that local governments have jurisdiction over private sewers, a suggested amendment to the *Plumbing and Drainage Act 2002* would be a new requirement for some method of statutory point of sale inspection whereby homeowners must submit to local governments for an inspection of their stormwater connections prior to selling their property. Currently, there are no statutory provisions requiring such

inspections in this Act or in other legislation such as the *Water Supply (Safety and Reliability) Act 2008*.

3. When the AECOM Australia Pty Ltd business resilience study of affected QUU infrastructure and the Montgomery Watson Harza risk management assessment of the Lockyer Valley Water Supply Schemes are expected to be completed and, if they are incomplete, the present status of these reviews.

20. The AECOM and Montgomery Watson Harza reviews are ongoing. The latest of several drafts of the reports have been provided to QUU. However, the reports are subject to the comment of a number of QUU employees. The reports are being reviewed for accuracy as to the factual matters in them. The reports are the subject of ongoing discussion and consultation before the reports can be finalised. It is anticipated that the reviews will be concluded prior to the end of the calendar year.

4. On the basis of any drafts or preliminary discussions resulting from the reviews mentioned in Item 3, whether it is presently anticipated there will be any findings or recommendations for the review or amendment of any standards, policies or guidelines that regulate sewerage infrastructure to ensure the infrastructure is appropriately flood resilient, and if so, what those findings and recommendations are likely to address.

21. The AECOM review has identified the following recommendation: that applicable local government interim flood standards be adopted to guide QUU planning.

22. To guide QUU planning, the interim standard adopted by local governments will be used in project feasibility to develop practical flood resilience for existing flood prone assets and proposed assets in QUU's Capital Investment Plan.

23. QUU will also update its contingency, emergency management and disaster recovery plans to have regard to the interim flood standard adopted by local governments.

Signed and solemnly, sincerely and truly affirmed and declared by Paul Belz, of Queensland Urban Utilities at Brisbane, Queensland, this 15th day of November 2011.

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Witness Signature

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Signature

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SAM SQUIRES

Print name