

Getting private water supplies right from the start

Why use or establishment of private water supplies may delay 224(c)

Many rural subdivisions in our district rely on private drinking water supplies, and we're seeing more 224(c) certificates delayed because the evidence provided doesn't meet the consent conditions. Most delays come from water supply design starting too late, treatment and monitoring requirements under the **Water Services Act 2021** not being fully considered, or an assumption that once a bore is drilled, the water supply is essentially complete, which often isn't the case.

At 224(c), Council must be satisfied that every lot will have safe drinking water and that the system will remain compliant over time, not just on the day it's tested. If the design, treatment, monitoring, and documentation aren't in place, 224(c) can't be issued even when all physical works are finished.

Drinking water safety is a long-term obligation

A key shift for developers is recognising that drinking water safety is a long term obligation. Source risk, treatment, monitoring, and ongoing management all matter. Some supplies must be registered, some contaminants can't be managed with standard UV and filters, and future owners must be able to comply with what's being consented. When these issues surface late, they often trigger redesigns, new conditions, extra testing, and specialist reporting at the most expensive point in the project.

The most effective step is to engage a Suitably Qualified and Experienced Professional (SQEP) early, ideally before lodging consent, to assess the entire drinking water system. That advice should cover source risk, legal status, treatment requirements, monitoring and maintenance expectations, and

whether the draft consent conditions are realistic and aligned with what's being built. It should also clarify what evidence will be needed at 224(c).

When water supply issues are picked up early, conditions are clearer, systems are designed correctly the first time, and 224(c) becomes far more predictable. When they're picked up late, titles are delayed, redesign and retesting costs escalate, and future owners may inherit unclear or unworkable obligations.

If your subdivision relies on a private water supply, treat drinking water compliance as a core part of feasibility. Get specialist advice early and design for ongoing compliance, not just passing a test. It's the simplest way to avoid costly and frustrating delays at 224(c).

What can you do to ensure consenting runs smoothly

The most effective step is to engage a Suitably Qualified and Experienced Professional (SQEP) early, ideally before lodging consent, to assess the entire drinking water system. The advice they give should cover source risk, legal status, treatment requirements, monitoring and maintenance expectations, and whether the draft consent conditions are realistic and aligned with what's being built. It should also clarify what evidence will be needed at 224(c).

A Suitably Qualified and Experienced Person (SQEP) for water supply design is a professional who has the qualifications, experience, and demonstrated competence to undertake and take responsibility for the design of drinking water infrastructure appropriate to the scale and complexity of the works.